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February 26, 1992
Project No. 3-30112-31

City of Newark
37101 Newark Boulevard
Newark, CA 94560-3790

Attention: Ms. Jackie Bretschneider

Subject: Addendum to Clarifier Sump Closure Plan
Liquid Waste Analytical Results
ICI Thoro Systems Products, 38403 Cherry Street, Newark, California

Dear Ms. Bretschneider:

RESNA Industries is issuing this addendum letter to supplement the Clarifier Sump Closure Plan issued by RESNA on February 13, 1992. On February 11, 1992, samples were collected from the liquid waste that was present in the sump. The samples were analyzed for volatile organic compounds using Environmental Protection Agency (EPA) Method 624. The analysis was conducted to determine if samples collected during the sump closure project would need to be analyzed for volatile organic compounds.

The results of the analysis revealed the presence of 1,1-dichloroethane, 1,1,1-trichloroethane, toluene, ethyl benzene, and xylenes. The concentrations of these compounds that were detected are shown on the attached analytical report from Chromalab, Inc. of San Ramon, California.

As a result of detecting these volatile organic compounds, samples collected during the sump closure project will be analyzed for those compounds as listed in the Clarifier Sump Closure Plan as well as the following:

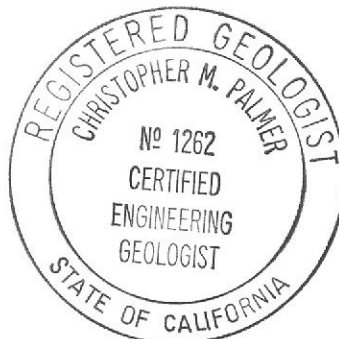
Halogenated volatile organics using EPA 601/8010
Aromatic volatile organics using EPA 602/8020

Copies of the laboratory reports and chain-of-custody document are attached. If you have any questions please call us at (510) 440-3300.

Sincerely,
RESNA Industries Inc.

Britt Von Thaden
Britt Von Thaden
Project Geologist

BVT/CMP/da
Attachments



Christopher M. Palmer
Christopher M. Palmer, C.E.G. 1262
Senior Program Geologist

- cc: Mr. Ravi Arulanantham, Alameda County Health Care Services Agency
Mr. Steven Inn, Alameda County Water District
Mr. Jim Piazza, ICI Thoro System Products, Newark, California
Mr. Gary Lopez, ICI Thoro Systems Products, Miami, Florida
Ms. Carol Dickerson, ICI Americas, Richmond, California

CHROMALAB, INC.

5 DAYS TURNAROUND

Analytical Laboratory (E694)

February 19, 1992

ChromaLab File # 0292093

RESNA

Date Sampled: Feb. 11, 1992

Attn: Laura Kuck

Date Submitted: Feb. 11, 1992

Date of Analysis: Feb. 19, 1992

Project Name: ICI

Project Number: 3-30112-31

Sample I.D.: SUMP WATER


Method of Analysis: EPA 624

Detection Limit: 2.0 µg/l

COMPOUND NAME	µg/l	Spike Recovery	
CHLOROMETHANE	N.D.	---	---
VINYL CHLORIDE	N.D.	---	---
BROMOMETHANE	N.D.	---	---
CHLOROETHANE	N.D.	---	---
TRICHLOROFLUOROMETHANE	N.D.	---	---
1,1-DICHLOROETHENE	N.D.	96%	97%
METHYLENE CHLORIDE	N.D.	---	---
1,2-DICHLOROETHENE (TRANS)	N.D.	---	---
1,2-DICHLOROETHENE (CIS)	N.D.	---	---
1,1-DICHLOROETHANE	70	---	---
CHLOROFORM	N.D.	---	---
1,1,1-TRICHLOROETHANE	27	---	---
CARBON TETRACHLORIDE	N.D.	---	---
1,2-DICHLOROETHANE	N.D.	---	---
BENZENE	N.D.	---	---
TRICHLOROETHENE	N.D.	95%	88%
1,2-DICHLOROPROPANE	N.D.	---	---
BROMODICHLOROMETHANE	N.D.	---	---
2-CHLOROETHYL VINYLETHER	N.D.	---	---
TRANS-1,3-DICHLOROPROPENE	N.D.	---	---
TOLUENE	3.6	---	---
CIS-1,3-DICHLOROPROPENE	N.D.	---	---
1,1,2-TRICHLOROETHANE	N.D.	---	---
TETRACHLOROETHENE	N.D.	94%	92%
DIBROMOCHLOROMETHANE	N.D.	---	---
CHLOROBENZENE	N.D.	---	---
ETHYL BENZENE	2.0	---	---
BROMOFORM	N.D.	---	---
1,1,2,2-TETRACHLOROETHANE	N.D.	91%	87%
1,3-DICHLOROBENZENE	N.D.	---	---
1,4-DICHLOROBENZENE	N.D.	---	---
1,2-DICHLOROBENZENE	N.D.	---	---
TOTAL XYLENES	42	---	---
ACETONE	N.D.	---	---
METHYL ETHYL KETONE	N.D.	---	---
METHYL ISOBUTYL KETONE	N.D.	---	---

ChromaLab, Inc.


Yiu Tam
Analytical Chemist


Eric Tam
Lab Director

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
80 SWAN WAY, ROOM 200
OAKLAND, CA 94621
PHONE NO. 415/271-4320

92 FEB 21 PM 12:09

Project Specialist (print)

- Jackie Bretschneider
had already approved this form
when I got involved with this case.
- will work together with Newark/AWD.
Ravi
3/13/92

WASTEWATER SUMP

~~UNDERGROUND TANK CLOSURE PLAN~~

*** Complete according to attached instructions ***

SEE ATTACHED SUMP CLOSURE PLAN

1. Business Name ICI Thoro Systems Products
Business Owner ICI Americas
 2. Site Address 38403 Cherry Street
City Newark, CA Zip 94560 Phone (510) 796-9911
 3. Mailing Address SAME as above
City _____ Zip _____ Phone _____
 4. Land Owner THORO SYSTEMS PRODUCTS
Address 7800 N.W. 38TH ST. City, State MIAMI, FL Zip 33166
 5. Generator name under which tank will be manifested See Section 4.2
for sump material disposal
- EPA I.D. No. under which tank will be manifested _____

6. Contractor RESNA Industries Inc.
Address 42501 Albrae Street
City Fremont, CA 94538 Phone (510) 440-3348
License Type _____ ID# _____

7. Consultant RESNA Industries Inc.
Address 42501 Albrae Street
City Fremont, CA Phone _____

8. Contact Person for Investigation
Name Mr. Britt Von Thaden Title Project Geologist
Phone (510) 440-3348

9. Number of ^{Sump} tanks being closed under this plan 1
Length of piping being removed under this plan 85 feet
Total number of ^{Sump} tanks at facility 1

10. State Registered Hazardous Waste Transporters/Facilities (see instructions).

**** Underground tanks are hazardous waste and must be handled **
as hazardous waste**

a) ~~Product/Residual Sludge/Rinsate~~ Transporter

Name Haz/Control, Inc. EPA I.D. No. CAD000628149
Hauler License No. _____ License Exp. Date _____
Address 731 Renz Lane
City Gilroy State CA Zip 95020

b) ~~Product/Residual Sludge/Rinsate~~ Disposal Site

Name _____ EPA I.D. No. _____
Address _____
City _____ State _____ Zip _____

^{SLUDGE}
c) ~~Tank and Piping~~ Transporter

Name _____ EPA I.D. No. _____

Hauler License No. _____ License Exp. Date _____

Address _____

City _____ State _____ Zip _____

^{SLUDGE}
d) ~~Tank and Piping~~ Disposal Site

Name _____ EPA I.D. No. _____

Address _____

City _____ State _____ Zip _____

11. Experienced Sample Collector

Name Scott Adams

Company RESNA Industries Inc.

Address 42501 Albrae Street

City Premont State CA Zip 94538 Phone (510) 440-3300

12. Laboratory

Name RESNA Industries Inc.

Address 42501 Albrae Street

City Premont State CA Zip 94538

State Certification No's 1211, 773, 269, 678

13. Have tanks or pipes leaked in the past? Yes [] No

If yes, describe. _____

14. Describe methods to be used for rendering tank inert

see Section 4.1 in attached Sump Closure Plan

Before tanks are pumped out and inerted, all associated piping must be flushed out into the tanks. All accessible associated piping must then be removed. Inaccessible piping must be plugged.

The Bay Area Air Quality Management District (771-6000), along with local Fire and Building Departments, must also be contacted for tank removal permits. Fire departments typically require the use of explosion proof combustible gas meters to verify tank inertness. It is the contractor's responsibility to bring a working combustible gas meter on site to verify tank inertness.

15. ^{Sump} Tank History and Sampling Information

Tank ^{SUMP}		Material to be sampled (tank contents, soil, ground-water, etc.)	Location and Depth of Samples
Capacity	Use History (see instructions)		
3,000 gal.	waste water clarifier;	concrete sump material, Soil and groundwater	see section 4.3 in Sump Closure plan

One soil sample must be collected for every 20 feet of piping that is removed. A ground water sample must be collected should any ground water be present in the excavation.

Excavated/Stockpiled Soil	
Stockpiled Soil Volume (Estimated)	Sampling Plan

Stockpiled soil must be placed on bermed plastic and must be completely covered by plastic sheeting.

16. Chemical methods and associated detection limits to be used for analyzing samples

The Tri-Regional Board recommended minimum verification analyses and practical quantitation reporting limits should be followed. See attached Table 2.

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Method Number	Method Detection Limit
Oil and grease	5030	5520 DIF 5520 CFF	50 ppb in soil 5,000 ppb in water
Mineral Spirits		Modified 8015	5 ppm in soil 50 ppb in water
Semi Volatile Compounds		EPA 8210	

17. Submit Site Health and Safety Plan (See Instructions)

18. Submit Worker's Compensation Certificate copy

Name of Insurer _____

19. Submit Plot Plan (See Instructions)

20. Enclose Deposit (See Instructions)

21. Report any leaks or contamination to this office within 5 days of discovery. The report shall be made on an Underground Storage Tank Unauthorized Leak/Contamination Site Report form. (see Instructions)

22. Submit a closure report to this office within 60 days of the tank removal. This report must contain all the information listed in item 22 of the instructions.

I declare that to the best of my knowledge and belief the statements and information provided above are correct and true.

I understand that information in addition to that provided above may be needed in order to obtain an approval from the Department of Environmental Health and that no work is to begin on this project until this plan is approved.

I understand that any changes in design, materials or equipment will void this plan if prior approval is not obtained.

I understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Safety and Health Administration) requirements concerning personnel health and safety. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility is not shared nor assumed by the County of Alameda.

Once I have received my stamped, accepted closure plan, I will contact the project Hazardous Materials Specialist at least three working days in advance of site work to schedule the required inspections.

Signature of Contractor

Name (please type) _____

Signature _____

Date _____

Signature of Site Owner or Operator

Name (please type) _____

Signature _____

Date _____

INSTRUCTIONS

General Instructions

- * Three (3) copies of this plan plus attachments and deposit must be submitted to this Department.
- * Any cutting into tanks requires local fire department approval.
- * One complete copy of your approved plan must be at the construction site at all times; a copy of your approved plan must also be sent to the landowner.

Item Specific Instructions

2. SITE ADDRESS
Address at which closure is taking place.
5. EPA I.D. NO. under which the tanks will be manifested
EPA I.D. numbers may be obtained from the State Department of Health Services, 916/324-1781.
6. CONTRACTOR
Prime contractor for the project.
10. STATE REGISTERED HAZARDOUS WASTE TRANSPORTERS/FACILITIES
 - a) All residual liquids and sludges are to be removed from tanks before tanks are inerted.
 - c) Tanks must be hauled as hazardous waste.
 - d) This is the place where tanks will be taken for cleaning.
15. TANK HISTORY AND SAMPLING INFORMATION
Use History - This information is essential and must be accurate. Include tank installation date, products stored in the tank, and the date when the tank was last used.

Material to be sampled - e.g. water, oil, sludge, soil, etc.

Location and depth of samples - e.g. beneath the tank a maximum of two feet below the native soil/backfill interface, side wall at the high water mark, etc.

17. SITE HEALTH AND SAFETY PLAN

A site specific Health and Safety plan must be submitted. We advocate the site health and safety plan include the following items, at a minimum:

- a) The name and responsibilities of the site health and safety officer;
- b) Identification of health and safety hazards of each work task. Include potential fire, explosion, physical, and chemical hazards;
- c) An outline of briefings to be held before work each day to appraise employees of site health and safety hazards;
- d) Frequency and types of air and personnel monitoring to be used - along with the environmental sampling techniques and instrumentation. Include instrumentation maintenance and calibration methods and frequencies;
- e) Specific personal protective equipment and procedures to be used by workers to protect themselves from the identified hazards. Also state the contaminant concentrations in air - or other conditions - which will trigger changes in work or work habits to ensure workers are not exposed to high levels of hazardous chemicals or to other unsafe conditions;
- f) Confined space entry procedures (if applicable);
- g) Decontamination procedures;
- h) Measures to be taken to secure the site, excavation and stockpiled soil during and after work hours (e.g. barricades, caution tape, fencing, trench plates, security guards, etc.);
- i) Spill containment and emergency/contingency plan. Be sure to include emergency phone numbers, the location of the phone nearest the site, and directions to the hospital nearest the site;
- j) Documentation that all site workers have received the appropriate OSHA approved trainings and participate in appropriate medical surveillance per 29 CFR 1910.120; and
- k) Page for employees to sign indicating they have read and will comply with the site health and safety plan.

The safety plan must be distributed to all employees and contractors working in hazardous waste operations on site. A complete copy of the site health and safety plan along with any standard operating procedures shall be on site and accessible at all times.

NOTE: These requirements are excerpts from 29 CFR Part 1910.120, Hazardous Waste Operations and Emergency Response; Final Rule, March 6, 1989. Safety plans of certain underground tank sites may need to meet the complete requirements of this Rule.

19. PLOT PLAN

The plan should consist of a scaled view of the facility at which the tank(s) are located and should include the following information:

- a) Scale;
- b) North Arrow;
- c) Property Lines;
- d) Location of all Structures;
- e) Location of all relevant existing equipment including tanks and piping to be removed and dispensers;
- f) Streets;
- g) Underground conduits, sewers, water lines, utilities;
- h) Existing wells (drinking, monitoring, etc.);
- i) Depth to ground water; and
- j) All existing tanks and piping in addition to the ones being pulled.

20. DEPOSIT

A deposit, payable to Alameda County for the amount indicated on the Alameda County Underground Storage Tank Fee Schedule, must accompany the plans.

21. Blank Unauthorized Leak/Contamination Site Report forms may be obtained in limited quantities from our office and from the San Francisco Bay Regional Water Quality Control Board (415/464-1255). Larger quantities may be obtained directly from the State Water Resources Control Board at (916) 739-2421.

22. TANK CLOSURE REPORT

The tank closure report should contain the following information:

- a) General description of the closure activities;
- b) Description of tank, fittings and piping conditions. Indicate tank size and former contents; note any corrosion, pitting, holes, etc.;

- c) Description of the excavation itself. Include the tank and excavation depth, a log of the stratigraphic units encountered within the excavation, a description of root holes or other potential contaminant pathways, the depth to any observed ground water, descriptions and locations of stained or odor-bearing soil, and descriptions of any observed free product or sheen;
- d) Description of sampling methods;
- e) Description of any remedial measures conducted at the time of tank removal;
- f) To-scale figures showing the excavation size and depth, nearby buildings, sample locations and depths, and tank and piping locations. Include a copy of the plot plan prepared for the Tank Closure Plan under item 19;
- g) Chain of custody records;
- h) Copies of signed laboratory reports;
- i) Copies of "TSDF to Generator" Manifests for all hazardous wastes hauled offsite (sludge, rinsate, tanks and piping, contaminated soil, etc.); and
- j) Tabulation of the volume and final destination of all non-manifested contaminated soil hauled offsite.