UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105

January 28, 1992

Scott Seery, Hazardous Materials Specialist
Alameda Co. Dept. of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621

Dear Mr. Seery:

Enclosed please find a copy of the Site Inspection report for the Sobex site in Fremont, California (CAD982399784).

The purpose of our investigation is to evaluate the Sobex site using EPA's Hazard Ranking System (HRS) criteria. The HRS assesses the relative threat associated with the actual or potential releases of hazardous substances from the site. The HRS is the primary method of determining a site's eligibility for placement on EPA's National Priorities List (NPL). The NPL identifies sites at which EPA may conduct Superfund remedial response actions.

In our Site Inspection report we are recommending that further sampling take place at the Sobex site, and since your agency is currently overseeing some of the sampling being performed by Sobex, we are including a proposed sample plan (Appendix F) that you may want to have the company include as part of their sample program. This will save our federal funds for other investigative work and will allow your agency to proceed without our interference. We are sending this report and the proposed sample plan to all agencies who are currently involved at the site for we understand that further sampling at each area on site is being overseen by different agencies.

I thank you in advance for your assistance in this project. If you have any questions, please feel free to give me a call at (415) 744-2345. Correspondence and final sample results can be sent to me at the above address, mail stop "H-8-1."

Sincerely,

Paul La Courreye
Senior Site Assessment Manager

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Copies of this report were sent to:

Linda Vrabel, City of Fremont
Linda Spencer, RWQCB - Oakland
Scott Seery, Alameda Co. Dept. of Environmental Health
Gil Jensen, Alameda Co. District Attorney's Office
Jill Duerig, Alameda Co. Water District
Dale Sobek, Sobex, Inc.
Don Plain, Cal EPA - HQ

205 00049

Bechtel

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San Francisco, CA 94105-1895
Mailing address: P.O. Box 193965
San Francisco, CA 94119-3965

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Site Inspection

Site: Sobex, Inc.
6000 Stevenson Boulevard
Fremont, California 94538
Alameda County

Site EPA ID Number: CAD 982399784

Work Assignment Number: 60-14-9J00, ARCSWEST Program

Submitted to: Paul La Courreye
Work Assignment Manager
Region IX

Date: January 9, 1992

Prepared by: James Davidson

Review and Concurrence: Susan Naughton

Bechtel Environmental, Inc.

1.0 INTRODUCTION

The U.S. Environmental Protection Agency (EPA), Region IX, under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the Superfund Amendments and Reauthorization Act of 1986 (SARA), has tasked Bechtel Environmental, Inc. (Bechtel), to conduct a Site Inspection (SI) at the Sobex, Inc.* site (Sobex site) in Fremont, Alameda County, California.

The Sobex site was identified as a potential hazardous waste site and entered into the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) on March 1, 1988 (CAD 982399784). The Sobex site was brought to the attention of EPA as a result of illegal dumping activities by the Sobex property owner in another county (1, 2) (see Section 2.4.1). A Preliminary Assessment (PA) on the Sobex site was conducted for the EPA in March of 1988 by the California Department of Health Services (3, 4). The purpose of the PA was to review existing information on the site and its environs to assess the threat(s), if any, posed to public health, welfare, or the environment and to determine if further action under CERCLA/SARA is warranted.

After reviewing the PA, the EPA decided that further investigation of the Sobex site would be necessary to more completely evaluate the site using EPA's Hazard Ranking System (HRS) criteria. The HRS assesses the relative threat associated with actual or potential releases of hazardous substances at the site. The HRS has been adopted by the EPA to help set priorities for further evaluation and eventual remedial action at hazardous waste sites. The HRS is the primary method of determining a site's eligibility for placement on the National Priorities List (NPL). The NPL identifies sites at which EPA may conduct remedial response actions. This SI report summarizes the results of EPA's recent SI investigation.

1.1 Apparent Problem

The EPA recommended that an SI be conducted to assess the potential for ground-water and soil contamination that resulted from past industrial operations on the property (3, 4). The apparent problems with the Sobex site are:

- Sampling and laboratory analysis of the contents of the illegally disposed drums from the Sobex site indicated that the drums contained hazardous wastes including priority pollutant metals, flammable materials, volatile organics (e.g., trichloroethene, methylene dichloride, tetrachloroethene), and carcinogenic compounds (e.g., 4,4'-methylenebis-2-chlorobenzenamine, 4,4'-mehtylenebis [2-chloroaniline] (MOCA)) (5).
- The foundry sands pile is uncontained and may contain heavy metals (6, 7).

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* Sobex vs Sobek: Sobex is the name of the last foam manufacturer operating at the site. The property is owned by Mr. Dale Sobek.

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- The construction debris pile is uncontained and may contain hydrocarbons, priority pollutant metals, and polychlorinated biphenyls (PCBs) (3, 6, 8).
- The soil pile is uncontained and contaminated with hydrocarbons (3, 6, 8). The presence and level of priority pollutant metals and PCBs are unknown.
- Presence and level of contamination in soils and ground water due to historical industrial operations is unknown.

2.0 SITE DESCRIPTION

2.1 Location

The Sobex site is located at 6000 Stevenson Boulevard in Fremont, California, in Alameda County. Coordinates of the property are approximately 37° 30' 59.5" latitude and 121° 59' 6" longitude (Township 5 South, Range 1 West, Sections 8 and 9 of the Mt. Diablo Baseline and Meridian; Niles, California, 7.5-minute quadrangle) (9). Figure 2-1 shows the location of the Sobex site.

2.2 Site Description

The Sobex site consists of approximately 42 acres. As shown on Figure 2-2, the property is bounded on the west by Stevenson Boulevard, on the north by Albrae Avenue, on the east by a railroad track and an unnamed intermittent stream, and on the south by Stevenson Business Park. Land use near the site is retail/commercial, light industrial, and multi-residential complexes (6).

The property has been owned by Mr. Dale Sobek since 1978 and is currently a retail/commercial complex consisting of seven buildings, as shown on Figure 2-2 (6, 7). Occupants of the buildings are listed in Table 2-1 (6, 10). Approximately 75 percent of the site is developed with buildings or parking facilities. The remaining 25 percent of the site is undeveloped and not paved. The undeveloped portion contains piles of foundry sand, contaminated soil, construction debris and automobiles stored for auction (3, 6, 11, 12).

2.3 Operational History

The Sobex property has been developed since 1963. The site is presently a retail/commercial complex operated by the 6000 S Corporation and owned by Mr. Sobek. A summary of property occupants and historical uses is provided in Appendix G. This section presents only the site operations that, in the past, used or generated hazardous substances.

From 1978 through 1979, Buildings 1 and 2, shown on Figure 2-3, were leased to Polymir Industries. This company manufactured polyurethane foam insulation board and various other foam products. Polymir Industries was owned by Mr. Sobek (7, 13).

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Source: U.S. Geological Survey, 7.5 Minute Niles Quadrangle, Alameda County, California

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Figure 2-1 Site Location

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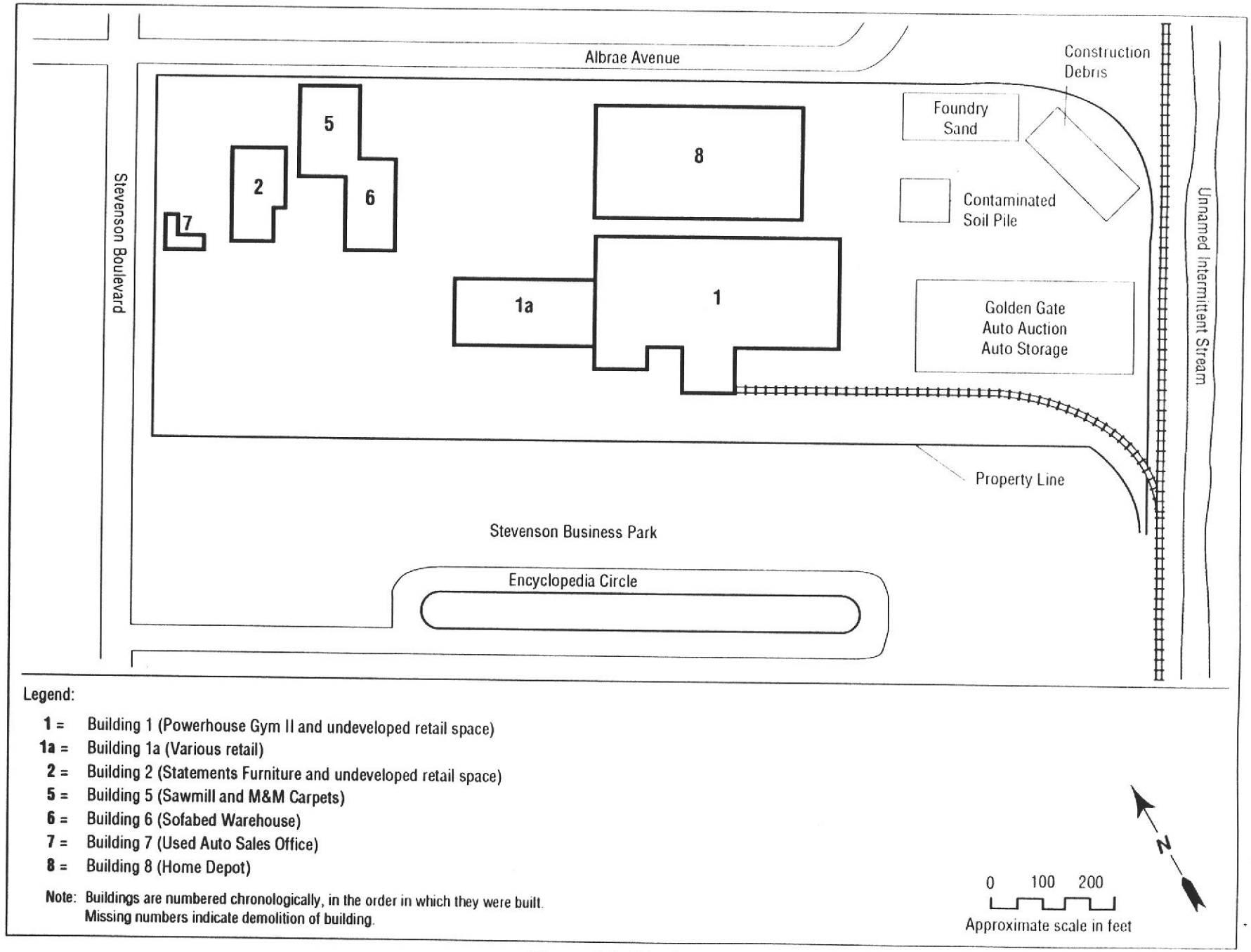

Legend:

- **1** = Building 1 (Powerhouse Gym II and undeveloped retail space)
- **1a** = Building 1a (Various retail)
- **2** = Building 2 (Statements Furniture and undeveloped retail space)
- **5** = Building 5 (Sawmill and M&M Carpets)
- **6** = Building 6 (Sofabed Warehouse)
- **7** = Building 7 (Used Auto Sales Office)
- **8** = Building 8 (Home Depot)

Note: Buildings are numbered chronologically, in the order in which they were built. Missing numbers indicate demolition of building.

Figure 2-2 Site Map

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Table 2-1

Current Site Occupants (6, 10)

Building 1	Presently being renovated for Powerhouse II Gym and other retail outlets
Building 1a	Nissan Tile La-Z-Boy Showroom Home Furniture Club Furniture Factory Outlet
Building 2	Statements Furniture Empty rental space
Building 5	Sawmill M&M Carpets Empty rental space
Building 6	Sofabed Warehouse
Building 7	Stevenson's Auto Center U-Haul Rental
Building 8	Home Depot
Area South of Building 1	Golden Gate Auto Auction Storage Area

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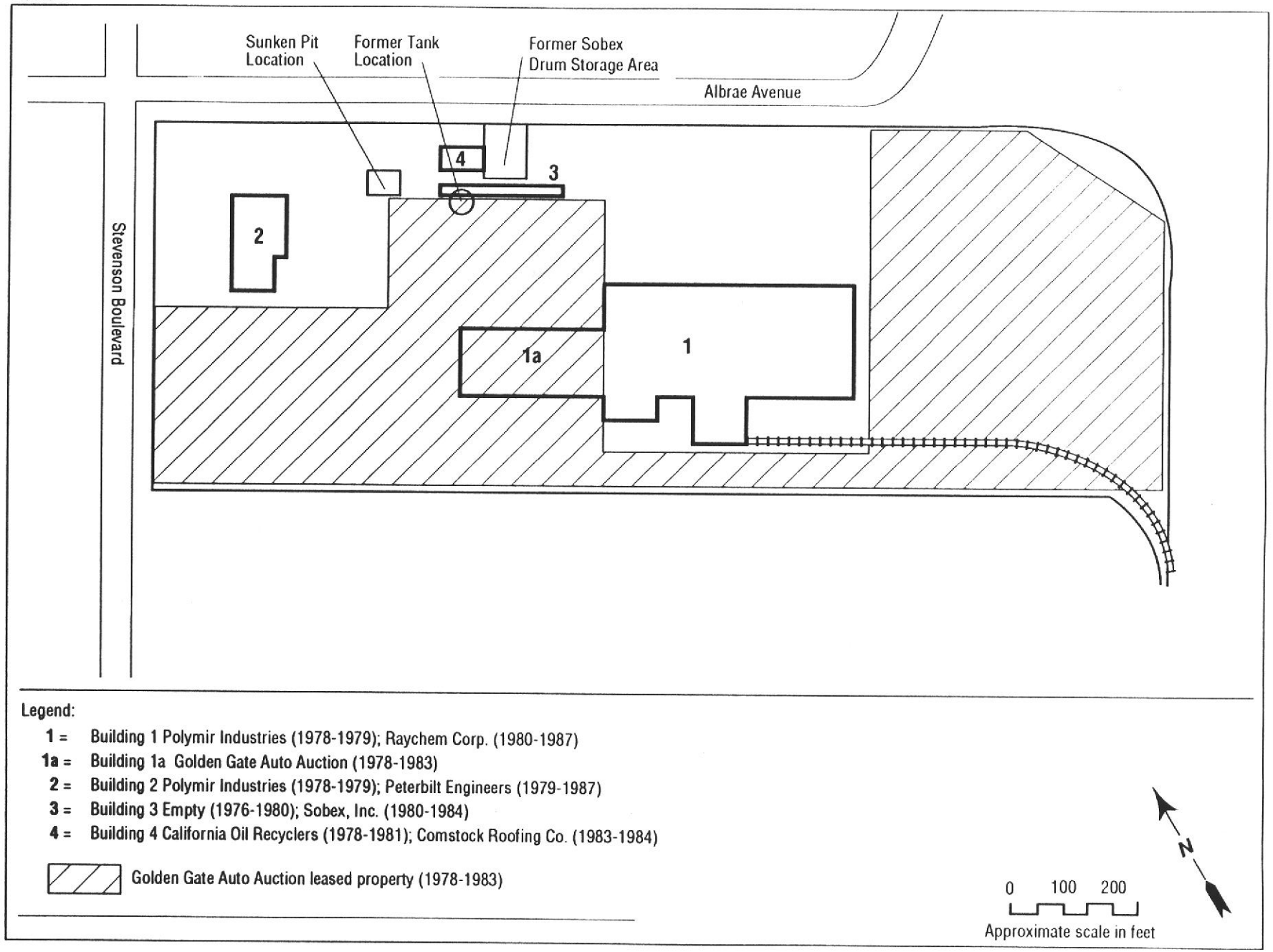

Figure 2-3 Historical Operations 1976-1984

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From 1978 through 1983, the Golden Gate Auto Auction leased Building 1a and the area which is shaded on Figure 2-3 for an auto auction yard where 2,000 to 4,000 cars were parked prior to sale. During this time, the company installed an underground gasoline storage tank. During removal of this tank in 1985, soil tests were conducted and no indication of a leak was detected (13). This gasoline storage tank is excluded from consideration due to exclusion of petroleum under CERCLA, Sections 101 (14) and 104 (a).

California Oil Recyclers leased Building 4 (Figure 2-3) from 1978 through 1981. This company reclaimed oil from gasoline stations and stored it in above-ground, 12,000-gallon storage tanks. Some reclaimed oil was mixed with diesel. These reclaimed products were then sold in bulk for various fuel oil usages. California Oil Recyclers was evicted in 1981 due to poor operational practices (7). The reclaimed oil and diesel from the California Oil Recyclers' operation are excluded from consideration due to exclusion to petroleum under CERCLA, Sections 101 (14) and 104(a). However, polychlorinated biphenyls (PCBs), priority pollutant metals, and other volatile and semivolatile organic compounds which may be present in the reclaimed oil are considered to be hazardous substances by CERCLA.

Sobex, Inc., a chemical consulting firm owned by Mr. Sobek, leased Building 3 (Figure 2-3) from 1979 to 1984 when the business was dissolved and ceased operations at the property (3). Operations of this firm were similar to Polymir (15).

Foundry sand was brought to the site in 1985/1986 to be used as fill to level areas for future development (7).

2.4 Regulatory Involvement

2.4.1 California Department of Health Services. In 1983, the California Department of Health Services investigated a complaint from a concerned citizen in Paskenta, Tehama County, California, that drums of possible hazardous waste were being transported and disposed of at a ranch owned by Dale W. Sobek near Paskenta (1). The Department of Health Services conducted sampling and laboratory analysis of the contents of the drums. The analysis indicated that the drums contained hazardous wastes including priority pollutant metals, flammable materials, volatile organics (e.g., methylene dichloride, tetrachloroethene), and carcinogenic compounds (e.g., 4,4'-methylenebis-2-chlorobenzenamine, 4,4'-methylenebis [2-chloroaniline]) (5).

The Department of Health Services then conducted a series of enforcement inspections at the Sobex site in Fremont. The single soil sample collected during these inspections indicated that priority pollutant metals and hydrocarbon compounds (alkanes) were present in the surface soils (2, 3). The Department of Health Services determined that the drums from the ranch in Tehama County were illegally transported from the Sobex site in Fremont (1, 2).

On October 19, 1983 criminal charges were filed in Alameda County Municipal Court in Fremont against Dale W. Sobek and his son, Drew M. Sobek. The Tehama County District Attorney's Office also filed a suit against Dale W. Sobek seeking civil penalties. The criminal charges against the Sobeks were subsequently dropped. The suit seeking civil penalties for the Sobeks' activities in Tehama County is being pursued by the Attorney General of the State of California (3).

During the 1983 inspections, the Department of Health Services also observed a 10,000-gallon above-ground isocyanate storage tank and illegally stored empty drums and drums containing

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potentially hazardous wastes (Figure 2-3) (2, 3). During 1984 and 1985, these drums were removed from the property, as ordered by the Department of Health Services, and disposed of by Chem Waste Management (3, 16).

In 1988, the Department of Health Services conducted a PA on the Sobex site in Fremont on behalf of the EPA. Based on this PA, the EPA decided that further investigation of the Sobex site would be necessary to more completely evaluate the site (3, 4).

The Department of Health Services is not presently involved with this site (3).

2.4.2 Alameda County Water District. Under the direction of the Alameda County Water District, the contaminated soil related to the former California Oil Recyclers' operation has been excavated and is undergoing bioremediation (Figure 2-2). A bioremediation monitoring plan is being developed by Mr. Sobek for submittal to the Alameda County Water District (16).

The Alameda County Water District is also working with the Regional Water Quality Control Board to establish the need for a ground-water monitoring plan to assess potential for contamination of the shallow aquifer. If required, the District will request that Mr. Sobek submit the plan (16).

2.4.3 City of Fremont, Hazardous Materials Division. Site activities relating to the construction debris pile (Figure 2-2), building cleanup, past hazardous material storage practices and any resulting contamination, and closure of the California Oil Recyclers' facility are being reviewed by the City of Fremont, Hazardous Materials Division, with assistance from Alameda County Water District and Alameda County District Attorney's Office. The Hazardous Materials Division is assessing compliance issues and potential contamination of soil and ground water (16).

2.4.4 Alameda County Department of Health. In 1985 and 1986, Mr. Sobek obtained from 2,000 to 4,000 cubic yards of foundry sands from American Brass and Iron Foundry of Oakland, California, to be used as clean fill. The foundry sands are presently stored in the undeveloped portion of the site (Figure 2-2) (7). Foundry sand is a listed waste under California Code of Regulations, Title 22, Article 11. Mr. Sobek is requesting that American Brass and Iron Foundry take back the sands for proper disposal or prove that the material is suitable for fill (17). Prior to such action, the Department of Health is reviewing a sampling plan submitted by Mr. Sobek to characterize the foundry sand (18). Presently, Dale Sobek is in litigation with American Brass and Iron Foundry, charging that the company falsely represented its sand material as acceptable for clean fill (17).

2.4.5 Alameda County District Attorney's Office. The District Attorney's Office is assisting the above agencies with enforcement actions related to foundry sand disposition and ground-water monitoring (19).

2.4.6 Regional Water Quality Control Board, San Francisco Bay Region. California Oil Recyclers abandoned the property on or about January 3, 1982 without completing the required regulatory closure and clean-up activities (7). The Regional Water Quality Control Board conducted a Compliance Monitoring Inspection of the property on January 26, 1982 (8). Reclaimed oil storage tanks, drums, an oil sump, and oil-contaminated soil were on site. Samples of standing rainwater collected from the surface soils were analyzed and found to contain 32 parts per billion (ppb) of PCBs (8). At the request of the Regional Water Quality Control Board, the

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storage tanks and drums were removed. Oil-contaminated soils were either paved over or excavated and stored in the southern part of the site. No documentation is on file to confirm these activities.

At present, the Regional Water Quality Control Board is monitoring activities of the other agencies and is available as requested by state and local agencies to review or enforce (21).

3.0 INVESTIGATIVE EFFORTS

3.1 Previous Sampling

Previous sampling has been conducted by state agencies and environmental consultants. Known locations of sample points are shown on Figure 3-1. A summary of the agency and consultant sampling events and the results (maximum concentrations detected) are presented in Table 3-1. Sampling has not been conducted to characterize the site to HRS data quality criteria.

3.1.1 Production Wells. Three production wells were installed in the early 1960s, as shown on Figure 3-1. These wells were from 270 feet to 586 feet deep. Well construction information is presented in the Report of Closure of Deep Production Wells prepared by Levine-Fricke in 1990 (20). It is reported by Mr. Sobek that Well A3 was used as a pumping well (downhole pump installed) for air conditioning and irrigation water. Well A3 was known to have floating hydrocarbon product. Well A4 was used for water recharge. In July of 1962, Well A1 was paved over. The previous use of Well A1 is unknown.

3.1.2 Ground-Water Sampling. Table 3-1 provides a summary of samples taken and the analytical results (maximum concentrations detected).

In February 1989, Polymatrix Associates was contracted by Ensco Environmental Services to obtain ground-water samples from the two accessible production wells. The purpose of this sampling event was to obtain information on the extent of contamination for an Environmental Impact Report on further commercial development of the property. Analysis requested included priority pollutant metals, volatile organic compounds, priority pesticides, PCBs, oil and grease, and total petroleum hydrocarbons as diesel and gasoline. The method of obtaining these samples and other relevant sampling and analysis quality control information are not available. Results of the Polymatrix analysis showed total petroleum hydrocarbons as diesel and gasoline along with PCBs in the pumping well (Well A3). No other chemicals were detected (11).

In March 1989, Ensco Environmental Services, Inc. obtained an additional ground-water sample for the Environmental Impact Report and analyzed it for total petroleum hydrocarbons as diesel and gasoline, volatile organic compounds, and PCBs. Ensco installed a monitoring well, MW-1 (Figure 3-1), near the former California Oil Recyclers' building and Sobex's drum storage area. This was a shallow monitoring well, completed to a depth of 25 feet. No information on duplicates, trip blanks, or laboratory quality control samples is available. The analysis detected one volatile organic compound (1,1-trichloroethane in a grab sample from an open boring). The level detected was 9.3 ppb and was below the Department of Health Services' drinking water standards (11).

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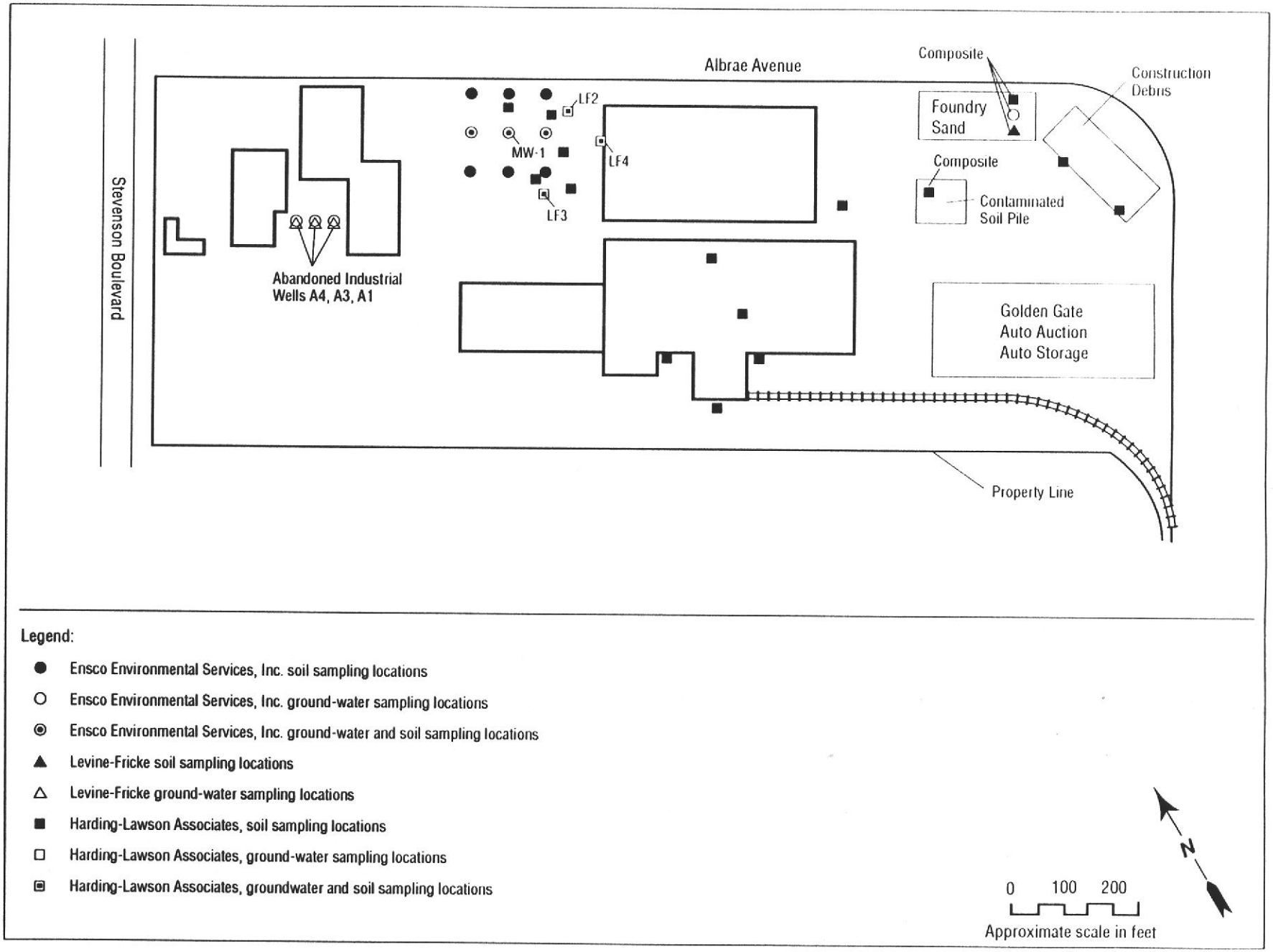

Figure 3-1 Previous Sampling Locations

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Table 3-1

Summary of Past Sampling and Analytical Investigations

Sample Source	Sample Obtained By	Sample Date	Operational Source	Analysis Parameter	Maximum Concentration Detected	Bench Mark	QA/QC Information
Rainwater (8)	RWQCB	1/26/82	California Oil Recyclers	**PCBs**	Aroclor 1254 32 ppm	14 ppm (1)	None available
Sludge Pile (8)	RWQCB	1/26/82	California Oil Recyclers	**PCBs**	Not Detected	Not available	None available
Drums (1)	CA-DHS	8/13/83	Sobek Ranch (drums from Polymir & Sobex, Inc.)	**Metals** Lead Zinc **Volatile Organics** N-(2-aminoethyl)-1 2-Diamine 1-Butanol Trichloroethane; 2-ethoxyethanol Toluene Ethyl benzene Xylene 1-methyl ethyl benzene Ethyl methylbenzene Alkanes	41,000 ppm 82,600 ppm (Identified but not quantifiable at that time; no further results found in file)	Not available	None available

Note: Metals (Known Laboratory Method):

- AA – Atomic Absorption
- ICP – Inductively Coupled Plasma Atomic Emission Spectroscopy
- STLC – Soluble Threshold Level Concentration
- TTLC – Total Threshold Level Concentration
- 1 – Surface Water (Freshwater), Ambient Water Quality Criteria/Ambient Aquatic Life Advisory
- 2 – Soil, Reference Dose Screen Concentration
- 3 – Ground Water, Reference Dose Screen Concentration
- 4 – Soil, Cancer Risk Screen Concentration.

Notes 1-4 are from USEPA memorandum on Chemical Data Tables for NPL Update II Proposal issued May 10, 1991 from Larry Reed, Acting Director, Hazardous Site Evaluation Division, Washington, D.C.

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Table 3-1 (cont'd)

Sample Source	Sample Obtained By	Sample Date	Operational Source	Analysis Parameter	Maximum Concentration Detected	Bench Mark	QA/QC Information
Drums (Liquid) (2)	CA-DHS	9/14, 15, 28 and 10/13/83	Sobex, Inc.	**Organics**			
				Benzene	Identified	Not applicable	None available
				Trieithyl phosphate	Identified		
				2,6 Bis(1,1-dimethyl ethyl)-4-methyl phenol	Identified		
				Dichlorinated compounds	Identified		
				Alcohols	Identified		
				Benzoic acid	Identified		
				Alkanes	Identified		
				(Additional organic compounds were also identified)			
				Metals (ICP)			
				Arsenic	20.1 ppm		
				Barium	12.8 ppm		
				Cadmium	1.38 ppm		
				Cobalt	295 ppm		
				Chromium	8.61 ppm		
				Copper	40.7 ppm		
				Nickel	3.06 ppm		
				Lead	125 ppm		
				Selenium	13.2 ppm		
				Zinc	197 ppm		
				Iron	443 ppm		

Note: Metals (Known Laboratory Method):

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- ICP – Inductively Coupled Plasma Atomic Emission Spectroscopy
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Table 3-1 (cont'd)

Sample Source	Sample Obtained By	Sample Date	Operational Source	Analysis Parameter	Maximum Concentration Detected	Bench Mark	QA/QC Information
Soil (2)	CA-DHS	9/14, 15, 28 and 10/13/83	Sobex, Inc.	**Organics**			None available
				Series of hydrocarbons	Identified		
				Oxygenated compounds	Identified		
				Metals (ICP)			
				Arsenic	9.74 ppm	580 ppm (2)	
				Barium	140 ppm	41,000 ppm (2)	
				Cadmium	1.62 ppm	290 ppm (2)	
				Cobalt	21.5 ppm	None available	
				Chromium	70.5 ppm	2,900 ppm (2)	
				Copper	24.1 ppm	22,000 ppm (2)	
				Nickel	43.6 ppm	12,000 ppm (2)	
				Lead	1090 ppm	None available	
				Selenium	12.2 ppm	1,700 ppm (2)	
				Zinc	1,270 ppm	120,000 ppm (2)	
				Iron	14,200 ppm	None available	
Soil (13)	Exceltech	4/8/85 (not analyzed til 4/30/85	Golden Gate Auto Auction	Benzene	90 ppb	Not applicable	Chain of custody
				Toulene	110 ppb		
				M-xylene	60 ppb		

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Table 3-1 (cont'd)

Sample Source	Sample Obtained By	Sample Date	Operational Source	Analysis Parameter	Maximum Concentration Detected	Bench Mark	QA/QC Information
Foundry Sand (7)	American Brass & Iron	6/15/85	American Brass & Iron	**Metals (TTLC)**			
				Antimony	0.6 ppm	Not applicable	None available
				Arsenic	1.0 ppm		
				Barium	3000 ppm		
				Beryllium	<0.1 ppm		
				Cadmium	2.9 ppm		
				Chromium IV	<0.1 ppm		
				Chromium	150 ppm		
				Cobalt	17 ppm		
				Copper	24 ppm		
				Lead	52 ppm		
				Mercury	0.14 ppm		
				Molybdenum	<0.1 ppm		
				Nickel	16 ppm		
				Selenium	<0.1 ppm		
				Silver	4.9 ppm		
				Thallium	<0.4 ppm		
				Vanadium	<0.5 ppm		
				Zinc	27 ppm		

Note: Metals (Known Laboratory Method):

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Notes 1-4 are from USEPA memorandum on Chemical Data Tables for NPL Update II Proposal issued May 10, 1991 from Larry Reed, Acting Director, Hazardous Site Evaluation Division, Washington, D.C.

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Table 3-1 (cont'd)

Sample Source	Sample Obtained By	Sample Date	Operational Source	Analysis Parameter	Maximum Concentration Detected	Bench Mark	QA/QC Information
Foundry Sands (composite sample) (24)	Levine-Fricke	5/21/90	American Brass & Iron	**Metals (TTLC)**			Chain of custody, laboratory quality control
				Arsenic	11 ppm	580 ppm (2)	
				Barium	370 ppm	41,000 ppm (2)	
				Beryllium	1.9 ppm	2,900 ppm (2)	
				Cadmium	12 ppm	290 ppm (2)	
				Chromium	82 ppm	2,900 ppm (2)	
				Cobalt	3.3 ppm	None available	
				Copper	120 ppm	22,000 ppm (2)	
				Lead	2,500 ppm	None available	
				Molybdenum	7 ppm	None available	
				Nickel	18 ppm	12,000 ppm (2)	
				Selenium	0.6 ppm	1,700 ppm (2)	
				Silver	2.4 ppm	1,700 ppm (2)	
				Vanadium	24 ppm	None available	
				Zinc	1400 ppm	120,000 ppm (2)	

Note: Metals (Known Laboratory Method):

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Notes 1-4 are from USEPA memorandum on Chemical Data Tables for NPL Update II Proposal issued May 10, 1991 from Larry Reed, Acting Director, Hazardous Site Evaluation Division, Washington, D.C.

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Table 3-1 (cont'd)

Sample Source	Sample Obtained By	Sample Date	Operational Source	Analysis Parameter	Maximum Concentration Detected	Bench Mark	QA/QC Information
Ground Water (deep production wells) (20)	Levine-Fricke	12/27/89	NA	Trichlorofluoromethane	6 ppb	None available	Chain of custody, some laboratory quality control, duplicate and blanks taken but not analyzed
				TPH as Diesel	1.6 ppm	None available	
				TPH as gasoline	97 ppb	None available	
				Xylenes	4 ppb	None available	
				PCBs	3.9 ppb	None available	
				Metals (AA)			
				Chromium	50 ppb	180 ppb (3)	
				Iron	180 ppb	None available	
				Nickel	40 ppb	700 ppb (3)	
				Zinc	20 ppb	700 ppb (3)	

Note: Metals (Known Laboratory Method):

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Table 3-1 (cont'd)

Sample Source	Sample Obtained By	Sample Date	Operational Source	Analysis Parameter	Maximum Concentration Detected	Bench Mark	QA/QC Information
Soil (borings) (11)	Ensco	3/89	California Oil Recyclers Sobex, Inc.	Oil & Grease TPH-diesel TPH-gasoline Toluene Ethyl benzene Xylenes Chloroform Methylene chloride 1-1 dichloroethane 1,1,1-trichloroethane **Metals** Antimony Arsenic Chromium Copper Lead Mercury Nickel Zinc	810 ppm 7900 ppm 79 ppm 0.3 ppm 1.9 ppm 16 ppm 27 ppb 50 ppb 51 ppb 34 ppb 30 ppm 16 ppm 52 ppm 21 ppm 30 ppm 0.09 ppm 67 ppm 43 ppm	None available None available None available 120,000 ppm (2) 58,000 ppm (2) None available 5,800 ppm (2) 35,000 ppm (2) 58,000 ppm (2) 52,000 ppm (2) 230 ppm (2) 580 ppm (2) 2,900 ppm (2) 22,000 ppm (2) None available 170 ppm (2) 12,000 ppm (2) 120,000 ppm (2)	Chain of custody
Ground Water (shallow monitoring wells) (11)	Ensco	3/89	California Oil Recyclers Sobex, Inc.	1,1,1-trichloroethane	9.3 ppb	3,200 ppb (3)	Chain of custody

Note: Metals (Known Laboratory Method):

- AA – Atomic Absorption
- ICP – Inductively Coupled Plasma Atomic Emission Spectroscopy
- STLC – Soluble Threshold Level Concentration
- TTLC – Total Threshold Level Concentration
- 1 – Surface Water (Freshwater), Ambient Water Quality Criteria/Ambient Aquatic Life Advisory
- 2 – Soil, Reference Dose Screen Concentration
- 3 – Ground Water, Reference Dose Screen Concentration
- 4 – Soil, Cancer Risk Screen Concentration.

Notes 1-4 are from USEPA memorandum on Chemical Data Tables for NPL Update II Proposal issued May 10, 1991 from Larry Reed, Acting Director, Hazardous Site Evaluation Division, Washington, D.C.

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Table 3-1 (cont'd)

Sample Source	Sample Obtained By	Sample Date	Operational Source	Analysis Parameter	Maximum Concentration Detected	Bench Mark	QA/QC Information
Ground Water (deep production wells) (11)	Polymatrix Associates	2/89	NA	Oil & Grease TPH-diesel TPH-gasoline PCBs **Metals** Lead Nickel Zinc Chromium	740 ppm 330 ppm 1.8 ppm 19 ppb 0.083 ppm 0.09 ppm 110 ppm 0.06 ppm	None available None available None available None available None available 700 ppb (3) 7,000 ppb (3) 180 ppb (3)	Chain of custody
Foundry Sands (11)	Ensco	3/89	American Brass & Iron	**Metals (STLC)** Arsenic Barium Chromium Lead Vanadium Zinc	 0.057 ppm 5 ppm 0.67 ppm 10 ppm 0.18 ppm 4.1 ppm	 580 ppm (2) 41,000 ppm (2) 2,900 ppm (2) None available None available 120,000 ppm (2)	Chain of custody

Note: Metals (Known Laboratory Method):

- AA – Atomic Absorption
- ICP – Inductively Coupled Plasma Atomic Emission Spectroscopy
- STLC – Soluble Threshold Level Concentration
- TTLC – Total Threshold Level Concentration
- 1 – Surface Water (Freshwater), Ambient Water Quality Criteria/Ambient Aquatic Life Advisory
- 2 – Soil, Reference Dose Screen Concentration
- 3 – Ground Water, Reference Dose Screen Concentration
- 4 – Soil, Cancer Risk Screen Concentration.

Notes 1-4 are from USEPA memorandum on Chemical Data Tables for NPL Update II Proposal issued May 10, 1991 from Larry Reed, Acting Director, Hazardous Site Evaluation Division, Washington, D.C.

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Table 3-1 (cont'd)

Sample Source	Sample Obtained By	Sample Date	Operational Source	Analysis Parameter	Maximum Concentration Detected	Bench Mark	QA/QC Information
Soil (borings) (12)	Harding-Lawson	9/19/91 to 9/20/91	California Oil Recyclers Sobex, Inc.	TPH-diesel TPH-gasoline TPH-kerosene Oil & Grease PCBs Xylenes Toluene Ethyl benzene Acetone 2-butanone Trichloroethylene 4-methyl-2-pentanone 1,1,1-trichloro-ethane 1,2-Dichlorethane	180 ppm 7,600 ppm 15,000 ppm 270 ppm 2.8 ppm 810 ppm 260 ppm 170 ppm 200 ppb 41 ppb 9.3 ppb 26 ppb 13 ppb 7 ppb	None available None available None available None available 0.076 ppm (4) None available 120,000 ppm (2) 58,000 ppm (2) 58,000 ppm (2) None available 53 ppm (4) None available 52,000 ppm (2) None available	Chain of custody, some laboratory quality control
Ground Water (shallow monitoring wells) (12)	Harding-Lawson	9/25/90	California Oil Recyclers Sobex, Inc.	TPH-gasoline TPH-kerosene TPH-diesel PCBs Toluene Total xylenes Trichlorofluoro-methane	9.6 ppm 4.9 ppm 85 ppb 1 ppb 25 ppb 2.8 ppm 14 ppb	None available None available None available None available 7,000 ppb (3) None available 1,100 ppb (3)	Chain of custody, some laboratory quality control, 1 duplicate sample

Note: Metals (Known Laboratory Method):

AA	–	Atomic Absorption
ICP	–	Inductively Coupled Plasma Atomic Emission Spectroscopy
STLC	–	Soluble Threshold Level Concentration
TTLC	–	Total Threshold Level Concentration
1	–	Surface Water (Freshwater), Ambient Water Quality Criteria/Ambient Aquatic Life Advisory
2	–	Soil, Reference Dose Screen Concentration
3	–	Ground Water, Reference Dose Screen Concentration
4	–	Soil, Cancer Risk Screen Concentration.

Notes 1-4 are from USEPA memorandum on Chemical Data Tables for NPL Update II Proposal issued May 10, 1991 from Larry Reed, Acting Director, Hazardous Site Evaluation Division, Washington, D.C.

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In December 1989, Levine-Fricke was contracted by Mr. Sobek to obtain grab samples from the three production wells (20). The purpose of this sampling event was for closure of these wells at the request of the Alameda County Water District and to test for priority pollutant metals, volatile organic compounds, priority pesticides, PCBs, oil and grease, and total petroleum hydrocarbons as diesel and gasoline. The production well that was paved over, Well A1, was uncovered for this sampling event. The only well noted to be purged prior to sampling was Well A3. Purging was conducted because of the floating hydrocarbon product present in the well. Purging was done by employees of Mr. Sobek and no information on thickness of hydrocarbon product or quantity purged is on record. It was noted that the volume that was purged was stored in a 55-gallon drum for further testing and disposal. Samples were packed in the appropriate containers. Samples submitted for PCB analysis were transported by Levine-Fricke personnel to the laboratory while samples submitted for metals analysis were transported by Mr. Sobek. No information on duplicates, trip blanks, or laboratory quality control samples is available (20). Analytical results from Wells A1, A3, and A4 showed metals and total petroleum hydrocarbons as diesel and gasoline. PCBs were detected in Well A3 samples. In addition, the floating product purged from Well A3 was analyzed and PCBs were detected at 360 ppm (20). The three wells were abandoned in February 1990 following Alameda County Water District guidelines (20, 21).

In September 1990, Harding Lawson Associates was contracted by Mr. Sobek to assist in a site characterization investigation of the Sobex site by request of the Alameda County Water District and the San Francisco Regional Water Quality Control Board (12). Harding Lawson installed three additional monitoring wells. These wells were installed to an average depth of 25 feet and are referred to as LF-2, LF-3, and LF-4 (there is no LF-1 on site). Samples were taken from the four monitoring wells (MW-1, LF-2, LF-3, and LF-4) (12). All wells were purged, and appropriate containers, proper chain of custody, and proper analytical methods used. No information on trip blanks or laboratory quality control samples is available (12). Well LF-2 sample analysis detected total petroleum hydrocarbons as gasoline and kerosene, toluene, and total xylenes. Well LF-3 sample analysis detected trichlorofluoromethane. Well LF-4 sample analysis detected total petroleum hydrocarbons as diesel. Well MW-1 sample analysis and its duplicate showed no detectable levels of constituents that were analyzed. No information on metals' analysis or laboratory quality control samples was presented in the report (12). This report was not issued as a final document.

3.1.3 Soil Sampling. Table 3-1 provides a summary of samples taken and the analytical results (maximum concentrations detected).

In March 1989, in addition to ground-water sampling discussed in Section 3.1.2, Ensco Environmental Services, Inc. drilled nine borings, sampling at approximately 5-foot intervals, to a depth of 16 to 20 feet. Selected boring samples were analyzed for total petroleum hydrocarbons as diesel and gasoline, oil and grease, PCBs, priority pollutant metals, and volatile and semivolatile organic compounds. In addition, Ensco obtained a composited grab sample from the foundry sands pile and submitted it for priority pollutant metals analysis (no further data is provided on how or where the samples were obtained) (11). Appropriate containers and proper chain of custody protocol were used. No information on duplicates, trip blanks, or laboratory quality control samples is available. Results of the analyses of the boring samples showed that oil, grease, total petroleum hydrocarbons as diesel and gasoline, toluene, ethyl benzene, and xylenes were present. No PCBs were detected in the soil samples. Analysis of metals for both soil and foundry sand samples detected concentrations below action levels of the Department of Health Services.

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In May 1990, Levine-Fricke was contracted by Mr. Sobek to sample the foundry sands pile to assess the concentration of soluble metals present and to evaluate those concentrations relative to disposal regulations (22). Sample locations were randomly selected. Twelve samples (with duplicates) were obtained, composited into three, and submitted for priority pollutant metals analysis. Appropriate sample containers, chain of custody, and laboratory quality control procedures were used. Information on analysis of duplicates or trip blank samples is not available. Concentrations of metals were detected in the samples submitted; however, levels were below the Soluble Threshold Limit Concentration and the Total Threshold Limit Concentration for all but one sample, which was over the limit for lead (22).

In September 1990, in addition to ground-water sampling discussed in 3.1.2, Harding Lawson Associates drilled ten borings to a depth of 16 to 20 feet, submitting two samples per boring for analysis. Additional samples were submitted from the contaminated soil (three grab samples), the construction debris pile (two below the pile), the drum storage area (six shallow borings) and from under Building 1 (two borings). Appropriate containers and proper chain of custody procedures were used. No information on duplicates or laboratory quality control samples is available. Results of this analysis showed that oil, grease, total petroleum hydrocarbons as diesel and gasoline, toluene, ethyl benzene, xylenes, and some volatile organic compounds were present. No PCBs where detected. Analysis for metals detected concentrations below Department of Health Services action levels (12). This report was not issued as a final document.

3.1.4 Previous Sampling Summary. The results of previous sampling events show that total petroleum hydrocarbons as diesel and gasoline, priority pollutant metals, selected volatile organics, and PCBs have been detected in the soil and ground water. Sampling has not been conducted to determine background levels. No detailed information was available on sample plans, field procedures, or laboratory procedures. Additional sampling is deemed necessary to evaluate soil and ground water contamination for HRS purposes.

3.2 EPA Sampling

Based on the review of available existing information, there appear to be three sources of contamination remaining at the Sobex site:

- Foundry sand pile
- Contaminated soil pile
- Construction debris pile

Previous sampling and analyses conducted at the Sobex site have not been sufficient to characterize the site nor to determine the hazardous constituents in the sources of contamination. Sampling and analysis recommendations for HRS purposes were proposed by Bechtel to EPA in October 1991 and are presented in Appendix H.

As discussed in Section 2.4, six state and local agencies have been involved in investigation and remedial activities at the Sobex site; five of these continue active involvement. These agencies have requested various sampling, monitoring, and remediation plans from Mr. Sobek, and they await submittal.

To minimize involvement by an additional agency (EPA) at this time, the agencies could be requested to include Appendix F recommendations within their requirements for Mr. Sobek.

4.0 HAZARD RANKING SYSTEM FACTORS

4.1 Sources of Contamination

Three past industrial operations at the site used or generated hazardous substances. These operations are California Oil Recyclers and two foam manufacturers, Polymir Industries and Sobex, Inc.

As discussed in Sections 2.4 and 3.1, much of the contaminated material from past operations has been removed, covered, or is excluded under CERCLA. Materials removed from the site include approximately 250 50-gallon drums containing hazardous substances, an above-ground 12,000-gallon recycled fuel oil tank, and an above-ground 10,000-gallon foam manufacturing chemicals tank. The exact location of the oil sump associated with California Oil Recyclers is unknown and has probably been covered with pavement or a building. Much of the contaminated soil has been covered with pavement and buildings. The majority of the remaining contaminated soil has been bulldozed into an uncontained pile on site.

Sources of contamination remaining on site and, therefore, considered in the HRS analysis are:

- Foundry sands brought to the site to be used as fill; presently stored on site in an uncontained pile; approximately 3,800 cubic yeards of material
- Construction debris from demolition of the California Oil Recyclers' facility and some of the foam manufacturing buildings; now stored on site in an uncontained pile; approximately 3,800 cubic yards of material
- Contaminated soil from California Oil Recyclers' and foam manufacturing operations; now stored on site in an uncontained pile; approximately 1,800 cubic yards

Characterization of these sources by chemical constituent, level of contamination, and quantity has not been conducted to HRS criteria. Waste type can be estimated, however, based on information on chemicals used/generated by these past industrial operations, and by the results of previous sampling presented in Table 3-1. Potential hazardous substances by sources are as follows:

Foundry Sands. These sands were purchased from American Brass & Iron Foundry of Oakland, CA and were tested and found to be non-hazardous by that company. Subsequent sampling of the foundry sands detected arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, mercury, molybdenum, nickel, silver, selenium, thallium, vanadium, and zinc (11, 12, 22).

Construction Debris and Contaminated Soil Pile. Hazardous substances associated with the operations of California Oil Recyclers, Polymir, and Sobex could be contained in construction debris and the soil pile. Based on information on the chemicals used and sampling results, the following hazardous substances could be contained in construction debris and the contaminated soil pile:

Contaminants from oil recycling that may be present are: total petroleum hydrocarbons as gasoline; total petroleum hydrocarbons as diesel; total petroleum hydrocarbons as kerosene; oil and grease; polychlorinated biphenyls; priority pollutant metals; volatile organic compounds, and semivolatile organic compounds.

Contaminants from foam manufacturing that may be present are: arsenic, barium, cadmium, chromium, cobalt, methylene chloride (dichloromethane), dichlorodifluoromethane (Freon 12), lead, methanol, methyl diphenyl diisocyanate (diphenylmethane diisocyanate), 4,4'-methylene-bis [2-chloroaniline], nickel, selenium, titanium oxide, toluene, diisocyanate, trichlorofluoromethane (Freon 11), trichlorotrifluoromethane (Freon 113), vinyl chloride, and zinc (3, 15).

4.2 Ground-Water Pathway

4.2.1 Hydrogeologic Setting. Ground water in the Fremont area occurs primarily in unconsolidated alluvium of Quaternary age. The alluvium has a series of sand and gravel aquifers, and clay aquitards that are up to 100 feet thick. From the uppermost downward, these aquifers are the Newark, the Centerville, the Fremont, the 400-foot, and the 500-foot aquifers. In the eastern part of the area near Niles, the gravel constitutes nearly the total thickness of the alluvium. Toward the west near the site, both the thickness and grain size of the aquifers decrease, while the intervening clay beds thicken. Depth to the top of the Newark aquifer in the vicinity of the site is approximately 15 to 40 feet (3, 11, 12, 16). Near the site the upper 40 feet of the unsaturated zone is typically silty clays/silty sands (7, 12, 16). Soils of this type have permeabilities of approximately 10^{-5} centimeters per second (3).

In the Fremont area, the upper aquifers are thought to be interconnected with the lower aquifers, which is a concern of the Alameda County Water District and the Regional Water Quality Control Board due to potential for contaminant migration (16, 23). The water quality of the shallower aquifers in the Fremont area has been degraded by salt-water intrusion and they are not used for drinking water. The deeper aquifers have been relatively unaffected by salt-water intrusion and are, therefore, important sources of municipal and domestic water supplies (16, 23).

As discussed in Section 3.1.1, there were three production wells located on site. One of these three wells extended to a depth of approximately 600 feet. This well could have served as a potential conduit for contaminant migration into the deeper aquifers (3, 16). All three wells were abandoned following the protocol of the Alameda County Water District (16, 20, 21). However, sampling and analysis conducted for abandonment did not include all the waste types discussed in Section 4.1 (16).

4.2.2 Ground-Water Targets. Ground water in the Fremont area is used by the Alameda County Water District as a water supply source. The district uses a blended ground-water system: 45 percent from Hetch Hetchy Reservoir and the South Bay Aqueduct, and 55 percent from 19 municipal wells operated by the Alameda County Water District (16). There are approximately 126,500 customers (residents, workers, and students) in the Fremont area using ground water as a source of water supply (16, 24).

There are approximately 200 active and inactive wells within a 4-mile radius of the site (3). Of the 19 municipal wells operated by the Alameda County Water District, 17 are within 4 miles (16). The nearest active municipal well is approximately 2.9 miles from the site (16).

4.2.3 Ground-Water Pathway Conclusion. Due to the presence of uncontained contaminated soils, the shallow depth to ground water, and the demonstrated interconnection of the shallow aquifer to the deeper aquifer, it appears that contamination may migrate from the site to the aquifer used to supply drinking water within the Water District.

4.3 Surface Water Pathway

4.3.1 Hydrologic Setting. The nearest surface water downslope of the site is an unnamed intermittent stream located about 70 feet to the south of the site boundary (6). This stream discharges into Mowry Slough and finally into San Francisco Bay National Wildlife Refuge which lies about 8,000 feet southwest of the site (3, 9). Wetlands that are developed as salt evaporation ponds make up the majority of this refuge.

The average slope of both the site and intervening terrain between the site and the nearest surface water is approximately 0.4 percent (3, 9).

The two year 24-hour rainfall (100-year interval) is approximately 5 inches (25). The average seasonal rainfall from November through April is 13.5 inches. The average seasonal lake evaporation during the same period is 13.2 inches (3). This yields a net seasonal precipitation of 0.3 inch.

4.3.2 Surface Water Targets. Surface waters of the coastal wetlands and the adjacent San Francisco Bay are used as commercial resources, such as for fisheries and salt evaporation, for recreation, and as a wildlife refuge. Surface water within 15 miles downgradient of the site is not used for drinking water (16).

4.3.3 Surface Water Pathway Conclusion. Based on the short distance to the nearest surface water and the presence of uncontained contaminated soils at the site, it appears that contaminants could migrate from the site to Mowry Slough and San Francisco Bay.

4.4 Soil Exposure and Air Pathway

4.4.1 Physical Conditions. The Sobex site consists of approximately 42 acres of land, approximately 75 percent of which is paved. The remaining 25 percent has an oil gravel cover which is not maintained. The portion of site in which the construction debris, contaminated soil pile, and foundry sands are located is not completely fenced (6).

4.4.2 Soil and Air Targets. Businesses on the Sobex site have approximately 100 employees (6). The residential population is approximately 145,000 individuals within the 4-mile radius of the site (24). A total of 230,000 people (residents, workers, and students) are estimated to be within 4 miles of the site (16, 25). There are no residences, schools, or day care centers within 200 feet of the site.

4.4.3 Soil and Air Pathway Conclusion. Access to the three sources of contamination is possible. However, exposure appears to be insignificant because no residential population is within 200 feet of the site.

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5.0 EMERGENCY RESPONSE CONSIDERATIONS

The National Contingency Plan [40 CFR 300.415 (b) (2)] authorizes the Environmental Protection Agency to consider emergency response actions at those sites that pose an imminent threat to human health or the environment. For the following reasons a referral to Region IX's Emergency Response Section does not appear to be necessary:

- Discharge to ground or surface waters was not observed.
- State and local agencies are addressing apparent problems.

6.0 SUMMARY

The Sobex site is located in Fremont, Alameda County, California. It is a retail/commercial complex consisting of seven buildings. Approximately 75 percent of the 42-acre site is developed with buildings or parking facilities. The remaining 25 percent of the site is undeveloped and not paved. The undeveloped portion of the property has piles of foundry sand, contaminated soil, and construction debris, along with automobiles stored for auction (6). Land use near the site is retail/commercial, light industrial and multi-residential complexes. A railroad spur parallels the southern boundary of the property. An unnamed intermittent stream is approximately 70 feet to the south of the site and parallels to the railroad spur (6). This stream drains into Mowry Slough and then to the San Francisco Bay National Wildlife Refuge which lies about 8,000 feet southwest of the property (9).

Prior to its use as a retail/commercial complex, the site contained three industries that used/generated hazardous substances. Three sources of contamination remain on site: foundry sands, contaminated soil pile, and construction debris (6). Characterization of these sources by chemical constituent, level of contamination, and quantity has not been conducted to HRS quality criteria. Hazardous substances can be estimated from information on chemicals used/generated by the past industries, and by results of previous sampling (1, 2, 5, 8, 11, 12, 14, 20, 22). Potential hazardous substances include: hydrocarbons, priority pollutant metals, selected volatile organic compounds, and polychlorinated biphenyls.

Ground water in the Fremont area is used by the Alameda County Water District as part of a blended water supply. There are approximately 126,500 customers that use ground water as a source of water (16, 24). The nearest municipal ground-water well is 2.9 miles from the site (16).

Surface water is not used as drinking water (16).

The area in which the sources of contamination are located is not completely fenced; access is possible (6).

The pertinent Hazard Ranking System factors for the site are:

- Lack of containment of sources to prevent contamination of the shallow ground-water aquifer

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- Potential interconnection of the shallow aquifer with the deeper drinking water aquifer
- Possible discharge of surface water runoff into the intermittent stream, and from there to fisheries and a national wildlife refuge
- Lack of sampling data that meets Hazard Ranking System data quality criteria

7.0 EPA RECOMMENDATION

	Initial	Date
No Further Remedial Action Planned Under CERCLA		
Higher-Priority For Further Site Assessment	pal	1.28.92
Lower-Priority For Further Site Assessment		
Defer To Other Authority (e.g., RCRA, TSCA, NRC)		

Notes:

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APPENDIX A

REFERENCE LIST

1. Small, D., California Department of Health Services, Memorandum to B. Parsons, October 14, 1983.

2. California Department of Health Services, Hazardous Waste Surveillance and Compliance Report regarding Sobex, Inc. in Alameda County, October 18, 1983.

3. Willian, M. A., California Department of Health Services, Preliminary Assessment for Sobex, Inc. prepared for EPA, March 25, 1988.

4. Abercrombie, D., ICF Technology, Inc., Letter to Paul La Courreye, U.S. Environmental Protection Agency, Review of the Preliminary Assessment of Sobek (EPA ID #CAD 982399786), August 19, 1988.

5. Stahler, J., California Department of Health, Letter to D. Sobek, August 23, 1983.

6. Davidson, J., Bechtel Environmental Inc., Site Reconnaissance Interview and Observations Report, August 30, 1991.

7. Earth Metrics Inc., Site Contaminant Characterization History Site of 6000 S Corporation, prepared for City of Fremont Bureau of Fire Prevention and Hazardous Materials, January 12, 1988.

8. Morse, S. I., San Francisco Bay Regional Quality Control Board, Letter to K. Prahl, March 2, 1982.

9. Davidson, J., Bechtel Environmental, Inc., Latitude/Longitude Worksheet, November 5, 1991.

10. Wun, R., Assistant Planner, City of Fremont, Letter to G. A. Jensen, Senior Deputy District Attorney, Consumer and Environmental Protection Division, April 19, 1991.

11. Siegel, D., Project Geologist, L. D. Pavlak, Senior Program Geologist, T. G. Loeb, Environmental Specialist, Ensco Environmental Services, Inc., Preliminary Environmental Assessment of the Sobek Property prepared for Wallace, Roberts and Todd, January 1990.

12. Fasiano, G. L., Senior Geologist, M. J. Leacox, Senior Geologist, Harding Lawson Associates, Report HLA Job No. 20071,003.13, Site Characterization Investigation 6000 Stevenson Boulevard, Fremont, CA prepared for 6000 S Corporation, November 6, 1990.

13. Blunt, D., Exceltech, Letter to Golden Gate Auto Auction, May 2, 1985.

14. Chem Waste Management, Waste Disposal Manifest, February 2, 1985.

15. Sobek, Dale, Deposition for Superior Court, County of Tehama, State of California, December 9, 1986.

16. Duerig, Jill, Alameda County Water District, Discussions recorded on Contact Report by J. Davidson, Bechtel Environmental, Inc., August 21 and September 19, 1991.

REFERENCE LIST (Cont'd)

17. Alameda County Department of Health, Letter to Mr. L. Lulofs Esq., Morton, Lulofs and Allen, March 1, 1991.

18. Lulofs, L.E., Morton, Lulofs & Allen, Letter to S. Serry, Hazardous Materials Specialist, Alameda County Department of Health, Re: Foundry Sand Sampling Proposal, August 30, 1991.

19. Jensen, G., and B. Johnson, Alameda County District Attorney's Office, Discussions recorded on Contact Report by S. Naughton, Bechtel Environmental, Inc., September 17, 1991.

20. Roat, R., Senior Staff Engineer, Levine-Fricke Consulting Engineers and Hydrogeologists, Letter to D. W. Sobek, Principal, Report (LF 1983.01) of Closure of Deep Production Wells 5S1W8A1, 5S1W8A3, and 5S1W8A4, prepared for 6000 S Corporation, July 13, 1990.

21. Ingle, Jim, Alameda County Water District, Letter to City of Fremont, April 18, 1990.

22. Levine-Fricke Consulting Engineers and Hydrogeologists, Draft Sampling of Foundry Sands for 6000 S Corporation, prepared for 6000 S Corporation, June 27, 1990.

23. San Francisco Bay Regional Quality Control Board, Tentative Order No. 91 to Bordon Packaging and Industrial Products, September 1991.

24. United States Census Data, Fremont and Vicinity, 1990.

25. Platt, A. M., Group Leader, Hazardous Waste Systems, MITRE Corporation, Draft revised HRS net precipitation values, May 26, 1988.

APPENDIX B

CONTACT LOG

Facility Name: Sobex, Inc.
Facility ID: CAD 982399784

Name	Affiliation	Phone #	Date	Information
Dana Blake	EPA, Region IX	415-744-1483	7/30/91	Dana reviewed RCRA database file for a Sobex listing and forwarded EPA records showing Sobex as a one-time waste generator.
Richard Hiett	Regional Quality Control Board, Region 2	510-464-4359	8/2/91	Set date with R. Hiett to review Sobex files on 8/6.
Richard Hiett	Regional Quality Control Board, Region 2	510-464-4359	8/15/91	See Contact Report
Dale W. Sobek	Sobex, Inc. (Owner) 6000 Stevenson Blvd. Fremont, CA	510-657-7633	8/14/91	First discussion about EPA PA/SI work. Basic questions/set up visitation date, week 8/26.
Judy Martin	File Clerk for City of Fremont, Public Works Dept., Haz. Mat. Div.	510-791-4271	8/15/91	See Contact Report
Doris Cruz	California Dept. of Health Services - File Clerk	510-540-3748 [FAX 510-540-3738]	8/15/91	See Contact Report
Dale W. Sobek	Sobex, Inc. (Owner) 6000 Stevenson Blvd. Fremont, CA	510-657-7633	8/20/91	Set 8/30 as site visitation date. Mr. Sobek was concerned about the volume of information requested because he wouldn't be able to provide it all. He also said much of it was available in published reports. I told him that I would review available reports and inform him of information still required.

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Name	Affiliation	Phone #	Date	Information
Judy Martin	City of Fremont, Public Works Dept., Haz. Mat. Div. - File Clerk	510-791-4271	8/20/91	Met Judy Martin and reviewed Sobex files in Fremont.
Dale W. Sobek	Sobex, Inc. (Owner) 6000 Stevenson Blvd. Fremont, CA	510-657-7633	8/21/91	See Contact Report
Judy Martin	City of Fremont, Public Works Dept., Haz. Mat. Div. - File Clerk	510-791-4271	8/21/91	See Contact Report
G. (Jill) F. Duerig	Alameda County Water District - Division Engineer	510-659-1970 x440 [FAX 510-770-1793]	8/21/91	See Contact Report
Kathy Gates	Dept. of Envir. Health, Div. of Haz. Mat., Alameda County Health Agency	510-271-4320 [FAX 510-568-3706]	8/21/91	No information available for the Sobex site.
Scott Seery	Dept. of Envir. Health, Div. of Haz. Mat., Alameda County Health Agency - Hazardous Materials Specialist	510-271-4320	8/21/91	Currently involved with District Attorney on foundry sand issue only. Awaiting detailed work plan, due 8/23. ACWD best info source.
G. (Jill) F. Duerig	Alameda County Water District - Division Engineer	510-659-1970 x440 [FAX 510-770-1793]	8/21/91	Left message regarding both EPA and Bechtel's involvement.
Doris Cruz	California Dept. of Health Services - File Clerk	510-540-3748 [FAX 510-540-3738]	8/26/91	Sobex file ready for review. Scheduled to review files on 8/27.
Doris Cruz	California Dept. of Health Services - File Clerk	510-540-3748 [FAX 510-540-3738]	8/27/91	Reviewed files at DHS. Called Legal Beagle to make copies of relevant file sections for use in SI report.
Judy Martin	City of Fremont, Public Works Dept., Haz. Mat. Div. - File Clerk	510-791-4271	8/27/91	Copies of Sobex files ready to pickup-$85.75 due in copy charges. Will pickup 8/30/91.

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Name	Affiliation	Phone #	Date	Information
Tom Peacock	Dept. of Envir. Health, Div. of Haz. Mat., Alameda County Health Agency	510-271-4320	8/29/91	Wants to know if he can and needs to attend site visit. Told him he could, but not necessary. Tom decided not to join us.
Dale W. Sobek	Sobex, Inc. (Owner) 6000 Stevenson Blvd. Fremont, CA	510-657-7633	8/30/91	See Site Reconnaissance Report.
Judy Martin	City of Fremont, Public Works Dept., Haz. Mat. Div. - File Clerk	510-791-4271	8/30/91	Went to Fremont and Picked up copied files.
G. (Jill) F. Duerig	Alameda County Water District - Division Engineer	510-659-1970 x440 [FAX 510-770-1793]	9/03/91	Discussed with Ms. Duerig general status of Sobex workplans. Asked if the Alameda County Water District was in a wellhead protection area - her response was negative.
Scott Seery	Dept. of Envir. Health, Div. of Haz. Mat., Alameda County Health Agency - Hazardous Materials Specialist	510-271-4320	9/03/91	Discussed Mr. Sobek's delay in submittal of foundry sands sample plan. The District Attorney's Office will be pursuing submittal of this document with Mr. Sobek.
Richard Hiett	Regional Quality Control Board, Region 2	510-464-4359	9/03/91	The RWQCB is acting as an advisor to the ACWD concerning groundwater and soil contamination issues at the Sobex site. The RWQCB is not currently concerned about PCB contamination as detected in an earlier sampling event.
Elizabeth Stowe	City of Fremont, Public Works Dept., Haz. Mat. Div.	510-791-4271	9/03/91	Left message that I wanted to discuss general Sobex site issues.
Mark Willian	California Dept. of Health Services	510-540-2122	9/03/91	Left message wishing to discuss previous P.A. report on Sobex site.

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Name	Affiliation	Phone #	Date	Information
Linda Vrabel	City of Fremont, Public Works Dept., Haz. Mat. Div. - Hazardous Materials Specialist	510-791-4271	9/03/91	Linda returned call for E. Stowe. She informed me that drums/tanks were removed satisfactorily from site, Building 1 cleanup was complete, groundwater monitoring was yet to be implemented. The City of Fremont is delaying further development of Building 1 until foundry sands and contaminated soils pile issued are addressed.
Linda Spencer	Regional Quality Control Board, Region 2	510-464-1255	9/03/91	New RWQCB representative for Sobex (replacing R. Hiatt)
Linda Spencer	Regional Quality Control Board, Region 2	510-464-1255	9/04/91	Received FAX concerning interconnection of aquifers in Fremont area.
Elizabeth Stowe	City of Fremont, Public Works Dept., Haz. Mat. Div.	510-791-4271	9/10/91	E. Stowe informed me that Sobex, Inc. missed their submittal date for Sample Plan of Foundry Sands and she wanted to know the status of the S.I. report. I told her it was proceeding and the final is scheduled to be issued in November.
Paul La Courreye	EPA, Region IX, San Francisco, CA - Work Assignment Manager	415-744-2345	9/13/91	Conducted Scoping Session with EPA.
Mr. Harris	Alameda County D.A. - Inspector	510-569-9289	9/16/91 9/17/91 9/18/91	Left message concerning authority issues regarding Sobex site. Mr. Harris referred me to Gil Jensen or Britt Johnson of the ACDA.
Gilbert A. Jensen	Alameda County D. A. Office, Consumer & Envir. Protection Div. - Sr. Deputy D.A.	510-569-9281	9/17/91	See Contact Report

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Name	Affiliation	Phone #	Date	Information
Britt Johnson	Alameda County D. A. Office, Consumer & Envir. Protection Div. - Legal Technician	510-569-9281	9/17/91	See Contact Report
Scott Seery	Dept. of Envir. Health, Div. of Haz. Mat., Alameda County Health Agency - Hazardous Materials Specialist	510-271-4320	9/17/91	See Contact Report
G. (Jill) F. Duerig	Alameda County Water District - Division Engineer	510-659-1970 x440 [FAX 510-770-1793]	9/19/91	See Contact Report
Linda Vrabel	City of Fremont, Public Works Dept., Haz. Mat. Div. - Hazardous Materials Specialist	510-791-4271	9/19/91	Confirmed authority issues regarding ACDA, ACWD and City of Fremont.
Scott Seery	Dept. of Envir. Health, Div. of Haz. Mat., Alameda County Health Agency - Hazardous Materials Specialist	510-271-4320	9/19/91	Picked up Foundry Sand Sample Plan

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APPENDIX C

CONTACT REPORT

AGENCY/AFFILIATION: Regional Water Quality Control Board - S.F. Bay Region			
DEPARTMENT:			
ADDRESS: 2101 Webster St., Suite 500		CITY: Oakland	
COUNTY: Alameda		STATE: CA	ZIP: 94612
CONTACT(S)	TITLE		PHONE
Richard Hiett			510-464-4359
BEI PERSON MAKING CONTACT: James E.F. Davidson			DATE: 15 Aug. 91
SUBJECT: Background information search			
SITE NAME: Sobex, Inc.		EPA ID#: CAD982399784	

DISCUSSION: RWQCB currently not actively involved with site. Reviewed Sobex file; partial listing as follows:

1. CA-DHS Mar. '88 - PA
2. Earth Metrics, Inc. Jan. '88 - Site Cont. Charact. History
3. Ensco Environ. Services, Inc. Jan. '90 - Pre. Environ. Ass.
4. EIR for City of Fremont
5. Varians letters from COF/ACWD/ACDA/ACHCS
6. Letters from RWQCB, PCB issue Mar. '82 & Request for add. info Jan. '90

8/15/91: Compare files to DHS files. DHS more complete. Request copy of DHS files.

CONTACT REPORT

AGENCY/AFFILIATION: City of Fremont			
DEPARTMENT: Hazardous Materials Division			
ADDRESS: 39572 Stevenson Blvd.		CITY: Fremont	
COUNTY: Alameda		STATE: CA	ZIP: 94539
CONTACT(S)	TITLE		PHONE
Judy Martin	files clerk		415-791-4271
Elizabeth Stowe	Haz. Mat. Spec.		415-791-4271
BEI PERSON MAKING CONTACT: James E. F. Davidson			DATE: 8/15/91
SUBJECT: Background information search			
SITE NAME: Sobex, Inc.		EPA ID#: CAD982399784	

DISCUSSION: Discussed basic nature of EPA PA/SI work and inquired what info might be available in their files. Was told their files are quite extensive and we could set up the Aug. 20 to review the files. There would be a copy charge but no file review fee for another public agency. Also stated I would fax our agency request letter to confirm our conversation.

CONTACT REPORT

AGENCY/AFFILIATION: City of Fremont			
DEPARTMENT: Haz. Mat. Division			
ADDRESS: 39572 Stevenson Blvd		CITY: Fremont	
COUNTY: Alameda		STATE: CA	ZIP: 94539
CONTACT(S)	TITLE		PHONE
Doris Cruz			
BEI PERSON MAKING CONTACT: James E. F. Davidson			DATE: 8/15/91
SUBJECT: Background information search			
SITE NAME: Sobex, Inc.		EPA ID#: CAD982399784	

DISCUSSION: Discussed basic nature of EPA PA/SI work and was requesting what info might be available in their files. Was told their files are quite extensive and we could set up the Aug. 20 to review the files. There would be a copy charge but no file review fee for another public agency. Also stated I would fax our agency request letter to confirm our conversation.

However, Ms. Cruz would review the files requested and get back with me latter to set a date for file review.

CONTACT REPORT

AGENCY/AFFILIATION: Sobex, Incorporated			
DEPARTMENT:			
ADDRESS:6000 Stevenson Boulevard		CITY:Fremont	
COUNTY: Alameda		STATE: CA	ZIP: 94538
CONTACT(S)	TITLE		PHONE
Dale Sobek	Owner		415-657-7633
BEI PERSON MAKING CONTACT: James E. F. Davidson			DATE: 21 August 91
SUBJECT: Site Visit			
SITE NAME: 6000 Stevenson Boulevard		EPA ID#: CAD982399784	

DISCUSSION: Discussed with Mr. Sobek the upcoming site visitation date. Mr. Sobek wishes for his attorney to attend this meeting due to recent developments and stated he would not be able to get a hold of him until Monday the 26th. Mr. Sobek also stated he was concerned about how long it would take him to gather the information that I requested in my letter. I stated I understood his concern and would appreciate it that he would contact me as soon as he can schedule his attorney to be present onsite. As far as the information, I told Mr. Sobek a large percentage of it I already had and I would appreciate his verification of the information I already had and that any other information could be provided as available, within reason. The meeting scheduled for the 30th of August is currently on hold.

CONTACT REPORT

AGENCY/AFFILIATION: City of Fremont		
DEPARTMENT: Hazardous Material Division		
ADDRESS: 39572 Stevenson Boulevard	CITY:Fremont	
COUNTY: Alameda	STATE: CA	ZIP: 94539-3075

CONTACT(S)	TITLE	PHONE
Judy Martin	Files Clerk	415-791-4279

BEI PERSON MAKING CONTACT: James E. F. Davidson	DATE: 21 August 91
SUBJECT: File review	
SITE NAME: 6000 Stevenson Boulevard	EPA ID#: CAD982399784

DISCUSSION: Ms. Martin called to inform me that the cost of the files I requested to have copied would be $85.75 and payable upon receipt and would probably be ready by the 28th of August. I told her that was fine and would be planning to pick up the files on the 30th during my site visit to the Sobex property.

203 00025
203 00040.

CONTACT REPORT

AGENCY/AFFILIATION: Alameda County Water District		
DEPARTMENT: Groundwater Resources		
ADDRESS: 43885 South Grimmer Boulevard	CITY: Fremont	
COUNTY: Alameda	STATE: CA	ZIP: 94537

CONTACT(S)	TITLE	PHONE
Jill Duerig	Division Engineer	510-659-1970 x440

BEI PERSON MAKING CONTACT: James E. F. Davidson	DATE: 21 August 91
SUBJECT: General information on water system and well closures at Sobex property	
SITE NAME: 6000S Stevenson Boulevard	EPA ID#: CAD982399784

DISCUSSION: Ms. Duerig stated as far as ACWD was concerned the wells closed @ the Sobex site had been closed properly. No extensive analysis of ground water was required and nothing was detected for parameters tested. ACWD was primarily concerned about leaving a pathway for further contamination to penetrate into the lower aquifer; this is why the wells were requested to be abandoned.

Ms. Duerig also stated that there was a concern on the part of the ACWD & the RWQCB that there was still a pathway for contamination because of natural interconnection between the ~~upper~~ shallow and ~~lower~~ Newark aquifers (which has been stated in several cleanup orders in Newark ie FMC, Romic, Jones.) The salt-water intrusion program is also concerned with interconnection since extraction is conducted in the ~~upper~~ Newark aquifer ~~to keep saltwater out of the lower aquifer.~~ which might increase vertical components of gradients

Contact Concurrence: _____ Date: 11/16/91

202 00033

CONTACT REPORT

AGENCY/AFFILIATION: Alameda County District Attorney's Office		
DEPARTMENT: Consumer and Environmental Protection Division		
ADDRESS: 2440 S Amador Street	CITY: Hayward	
COUNTY: Alameda	STATE: CA	ZIP: 94539

CONTACT(S)	TITLE	PHONE
Gil Jensen		510-569-9281

BEI PERSON MAKING CONTACT: Susan Naughton SN	DATE: Sept 17, 91
SUBJECT: County Enforcement Authority at Sobex	
SITE NAME: Sobex	EPA ID#: CAD 982399784

DISCUSSION: Gil Jensen returned my call. We discussed BEI current activities at the Sobex site; that to verify our analysis under the HRS that we needed some additional samples; and we we needed to know from him the County DA enforcement authority and status of site involvement. I summarized my discussions with Britt Johnson (County DA) and Scott Seery (County DHS).

Jensen stated that the County DA is, at this time, only involved with the foundry sands. During the next phase (no date as yet) it will deal with groundwater. He is litigating against Mr. Sobex under the State Hazardous Waste Control Act. He may not have legal jurisdiction to request that Mr. Sobek sample for our samples. He would review our sampling recommendations with Seery and decide. Technically, if its fine with Seery, its fine with him. His only concern is that we not request extensive, long-term sampling. He requested that we call Seery and request the Foundry Sands sample plan. Any comments we can provide to Seery would be greatly appreciated

Contact Concurrence: _____ Date: 9-27-91

202 00034

CONTACT REPORT

AGENCY/AFFILIATION: Alameda County District Attorney's Office		
DEPARTMENT: Consumer and Environmental Protection Division		
ADDRESS: ~~2440 S Amador Street~~	CITY: ~~Hayward~~	
COUNTY: Alameda	STATE: CA	ZIP: ~~94539~~

CONTACT(S)	TITLE	PHONE
Britt Johnson	Legal Technician	510-569-9281

BEI PERSON MAKING CONTACT: Susan Naughton SN	DATE: sept 17, 91
SUBJECT: County Enforcement Authority at Sobex	
SITE NAME: Sobex	EPA ID#: CAD 982399784

DISCUSSION: Mr. Johnson called at the request of Gil Jensen. I discussed the PA/SI process and that we recently conducted a site visit at Sobex, Inc in Fremont. Based on the site visit and information collected to date, we need additional sampling data to verify our HRS analyses of the potential contamination from the foundry sands, construction debris pile, contaminated soils pile undergoing bioremediation, and to ground water. Prior to further involvement at the site, EPA asked us to discuss the enforcement authority of the County DA with the DA staff and the potential schedule for completion of sampling/remediation actions at the Sobex site. If County DA has enforcement jurisdiction and the site would move forward in a timely manner, EPA would like to request that the County DA request that Mr. Sobek sample for a number of EPA-specified chemical components at specific locations.

Johnson reviewed the numerous laws giving the County DA Office enforcement authority. Summary - its authority stems from CA State laws and it often works ~~hand-in-hand~~ with ~~the~~ State ~~Attorney General on cases.~~

Johnson is not sure of present DA Office involvement at Sobex. He has talked with Scott Seery (Hazardous Material Specialist, 271-4320) Seery told him that a meeting is planned for next month to discuss site status "to move it forward". I told him we would call Seery to discuss Sobex, and that maybe it would be beneficial for the EPA to attend the meeting when its held so the sampling needs of all agencies can be discussed.

Contact Concurrence: Britt Johnson Date: 9-27-91

202 00035

CONTACT REPORT

AGENCY/AFFILIATION: Alameda County Department of Environmental Health		
DEPARTMENT: Hazardous Materials Division		
ADDRESS: 80 Swan Way, Room 200	CITY: Oakland	
COUNTY: Alameda	STATE: CA	ZIP: 94621

CONTACT(S)	TITLE	PHONE
Scott Seery	Hazardous Materials Spec.	510-271-4320

BEI PERSON MAKING CONTACT: Susan Naughton SN	DATE: Sept 17, 91
SUBJECT: County Enforcement Authority and Activities at Sobex	
SITE NAME: Sobex	EPA ID#: CAD 982399784

DISCUSSION: Scott Seery returned my call. We discussed County enforcement authority.
Summary - Since app. ex 1985, the County has had a Memorandum of Understanding with the State. The County operates for State in implementation and enforcement of CAL-EPA (CA DHS) laws/regulations (Chp. 6.5, HSC; Title 22, CCR) relating to hazardous waste within its jurisdiction.
Seery's (SEERY) present actions at Sobex relate to foundry sands only.
~~He~~ stated there are volumes of data and correspondence within the different agencies relating to activities at Sobex. I said we had collected lots of it. We have talked with numerous agencies, conducted data review and site visit and still need a few additional parameters sampled for to be able to verify our analysis under HRS. I said that Jim Davidson, Site Leader, would contact him to discuss our findings and our sampling needs and rationale. We were in process of submitting a letter to EPA outlining our sample needs. EPA would then request County to request Mr. Sobek to add these samples. ~~He~~ SEERY said County (he) should not have a problem with this.
~~He~~ SEERY said because of his ~~experience in remediation at foundry,~~ research and prior experience with a NPL site associated with foundry sands disposal, he requested that foundry sands be sampled for certain Title 22 metals, dioxins/furans, and PNAs.
Mr. Sobek submitted sample plan recently. DA requested that Seery review by end of first week of October. Seery would appreciate our input if we can prior to that time.

Contact Concurrence: _____ Date: 10-3-91

202 00028
202 00040

CONTACT REPORT

AGENCY/AFFILIATION: Alameda County Water District (ACWD)		
DEPARTMENT: Groundwater Resources		
ADDRESS: 43885 South Grimmer Boulevard	CITY: Fremont	
COUNTY: Alameda	STATE: CA	ZIP: 94537
CONTACT(S)	TITLE	PHONE
Jill Duerig	Division Engineer	415-659-1970 x440
BEI PERSON MAKING CONTACT: James E. F. Davidson GM		DATE:19 Sept 91
SUBJECT: General information on water system and authority at Sobex property		
SITE NAME: Sobex, Inc	EPA ID#: CAD982399784	

DISCUSSION: Asked Ms. Duerig some basic questions regarding the Alameda County water distribution system and other site issues, these are summarized as follows:

- Water supply sources: Hetch Hetchy and South Bay Aqueduct directly supply 45% of the systems water the remaining 55% is supplied by groundwater wells (a total of 19 wells); some SBA water is used for artificial recharge.
- Other wells of concern are the salinity barrier wells which draw the water toward the bay to reclaim ~~reservoir~~ aquifer capacity. This effort is on hold due to the potential of drawing contaminants across the ~~reservoir.~~ aquifer.
- Number of people served approximately 250,000 (160,000? resident population from 1990 census information). ↳ in cities of Fremont, Newark and Union City
- The ACWD does have jurisdiction to enforce but has chosen not to be the primary complainant. Currently when there is a problem of discharge to the groundwater the ACWD works with the San Francisco Regional Water Quality Control Board (RWQCB) or other appropriate agency(s) to address the situation. With the Sobex site the ACWD ~~has addressed their concern to the~~ is coordinating with RWQCB (Linda Spencer) and they are establishing a schedule to address potential groundwater problems within the next year.
- The ACWD is currently working on the contaminated soil under current bioremediation with the Alameda County District Attorney Office. The ACWD current wish is for this material to be disposed offsite and that this remediation effort is only to reduce its contamination for disposal.

Contact Concurrence: Jill Duerig Date: 11/16/91

APPENDIX D

Site Reconnaissance Interview and Observation Report

Site Name:	Sobex, Inc. 6000 Stevenson Boulevard Fremont, CA
EPA ID#:	CAD982399784
Site Visit Date:	August 30, 1991
Observations made by:	James Davidson Susan Naughton Gary Yao
Facility Representative(s) and Title(s):	Dale W. Sobek, owner of property Larry Lulofs of Morton, Lulofs and Allen, law firm for Mr. Sobek

Initially the site was owned by Pullman Trailmobile, as stated in the Earth Metrics, Inc. report of January 1988. Mr. Dale Sobek purchased the 42 acre site in 1978 and still owns it. Mr. Sobek stated that the Earth Metric's report presents maps detailing the site history as well as past agency involvement.

In 1988, Mr. Sobek requested a rezoning of his property from industrial to commercial. Prior to rezoning, the City of Fremont required that an Environmental Impact Report be prepared. This report identified site-specific issues that needed to be addressed prior to additional property development and rezoning. Some of these issues related to site contamination. Based on this report, local agencies have been requesting that Mr. Sobek provide site contamination data. Mr. Sobek has attempted to respond to these requests but has found it frustrating because the requesters do not specify what they want. He feels he is being hampered in his development of Building 1, the last building to be renovated for commercial use.

Two issues are being pursued by Mr. Lulofs on behalf of Mr. Sobek:

- Oil Contaminated Soils: California Oil Recyclers abandoned the site in 1982 leaving behind contaminated soils and materials. Mr. Lulof is working to resolve the contamination issue with the company

- Foundry Sands: Foundry sands were purchased in 1985 from American Brass and Iron Co. to be used as fill. Mr. Sobek was led to believe that these sands were "clean". He has been requested by the Alameda County Department of Health to submit a Sampling Plan to characterize the sands prior to their use as fill or removal.

There are no chemicals and/or drums presently on site.

Two of the three abandoned production wells where used for air conditioning and irrigation purposes.

Based on information from the Regional Water Quality Control Board, PCBs were detected in stagnant rainwater on site. We asked if additional analysis had been conducted for PCBs; he said yes and the results were "non-detect". (This was confirmed by E. Stowe from the City of Fremont, but documentation is not available due to non-payment for services).

Remaining unresolved issues with the county agencies are as follows:

- Foundry Sands: sample plan to be submitted to Alameda County Department of Health prior to use as fill or removal by American Brass and Foundry

- Contaminated Soils Pile: being bioremediated by ETIC. Pile is on 10 millimeter thickness visqueen and is regularly watered, tiled, and fertilized. End of October, ETIC will conduct final testing for disposal/deposition. Alameda County Water District has requested a monitoring plan.

- Alameda County Water District and Regional Water Quality Control Board are evaluating the need for a ground-water monitoring plan to assess potential contamination of shallow aquifer

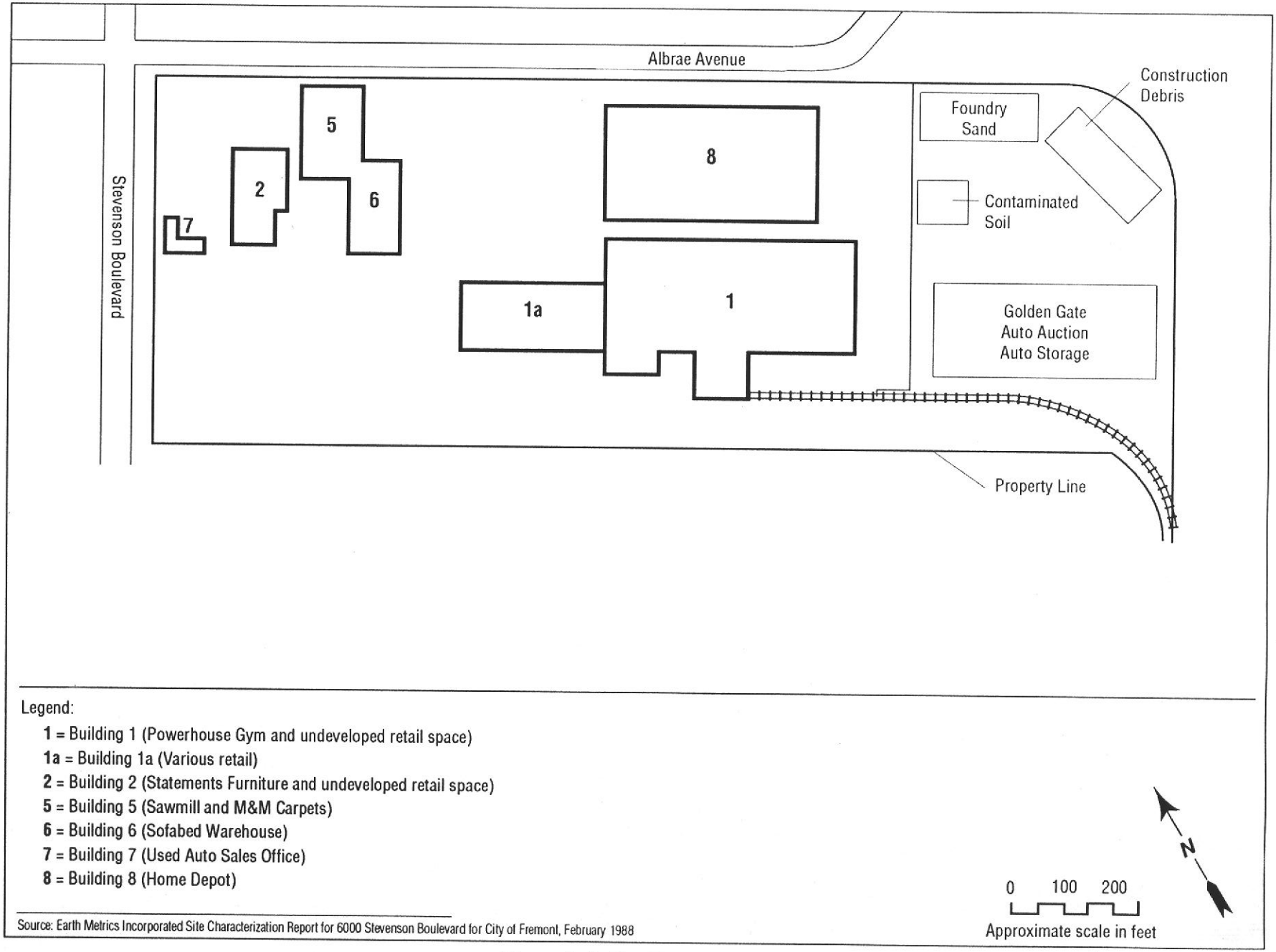
Site Observations

Within the property boundary the site is developed with retail/commercial outlets and parking facilities, as shown on Figure D-1. Building 1 is presently under renovation. Some of the other buildings are unoccupied. The area south of Buildings 1 and 8 is undeveloped. In this area are the piles of contaminated soil, foundry sand, and construction debris. These sources of contamination can be reached from the adjacent back parking lot. The undeveloped area is fenced on the remaining three sides. During the visit, the following animals were observed: a fox in the construction debris, a rabbit among the automobiles, and a squirrel on the west edge of the property.

Surrounding Developments

As shown on Figure D-2, the area around the Sobex, Inc. site is a combination of light industrial, commercial, and retail businesses, and multi-residential complexes. Along the south edge of the property lies a railroad spur and an unnamed intermittent stream. Further to the south is the Pacific Business Park. To the west is the Stevenson Business Park that houses Gold's Gym, a florist wholesaler, an autoparts warehouse distribution, GTE service center and various other office space. Further to the west is Comstock Roofing Materials and Borden Packaging. To the north is a small multi-residential complex, retail outlets, motel, and auto dealerships. To the east are additional retail outlets and Interstate-880.

CG/2/So/294



Source: Earth Metrics Incorporated Site Characterization Report for 6000 Stevenson Boulevard for City of Fremont, February 1988

Figure D-1 Site Map

Printed on 50% recycled paper.

CG/2/So/294

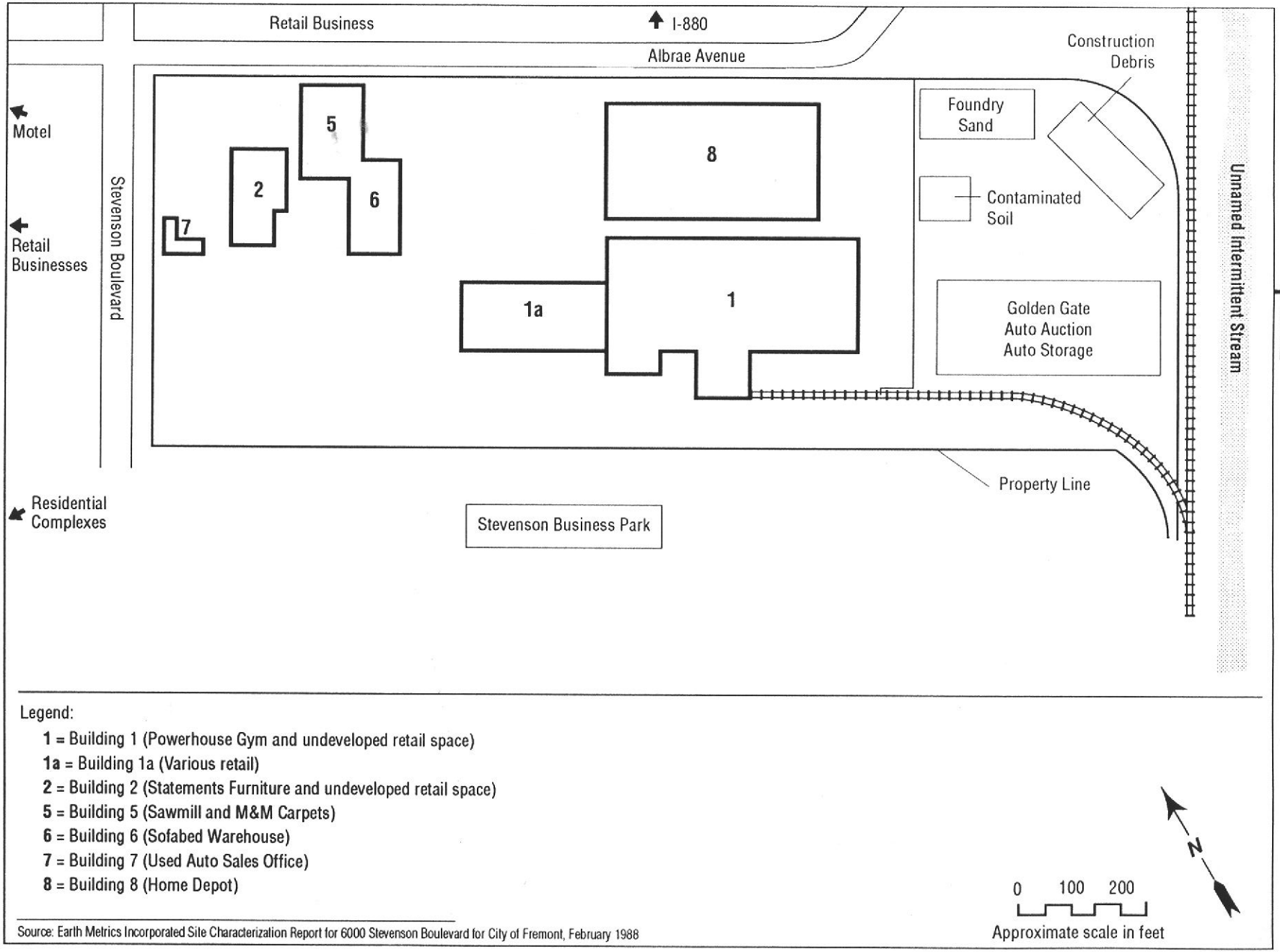


Figure D-2 Vicinity Map

Printed on 50% recycled paper.

Appendix F

Sample and Analysis Recommendations
For
Sobex, Inc.
6000 Stevenson Boulevard
Fremont, California
EPA ID # CAD 982399784

Bechtel Environmental, Inc. is currently working for the U.S. EPA to assist it in the Site Assessment Program under CERCLA/SARA. This program uses the Hazard Ranking System (HRS) (40CFR300) to evaluate a site's potential eligibility for the federal National Priorities List (NPL). The HRS process is a scoring system used to assess the relative level of contamination associated with actual or potential releases of hazardous substances to the environment at a site or facility. The HRS process has two investigative steps, the Preliminary Assessment (PA) and the Site Inspection (SI).

A PA is a limited scope investigation of sites on the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) database. The PA is designed to distinguish between sites that pose little or no threat to human health and the environment and sites that require further investigation to make such a determination. If the PA recommends further investigation, an SI is performed. The objective of the SI is to identify which sites have a high probability of qualifying for the NPL.

Bechtel Environmental is conducting an SI of the Sobex, Inc. site located in Fremont, California. Based on analysis of results of previous sampling events, the California Department of Health Services Preliminary Assessment, and of our preliminary Hazard Ranking System (HRS) evaluation, we recommend the following locations (shown on Figure H-1) be sampled for the Sobex SI:

- Foundry sands pile
- Contaminated soil pile undergoing bioremediation
- Construction debris pile
- Onsite ground-water wells
- Background soil samples
- Background ground-water samples

Sampling and analyses recommended for each of the above are described below. This sampling effort is recommended to obtain data for EPA's HRS analysis as part of the ongoing Site Inspection. These sampling recommendations are not intended to address any federal, state or local compliance issues and are only intended to assist in the HRS evaluation of the site.

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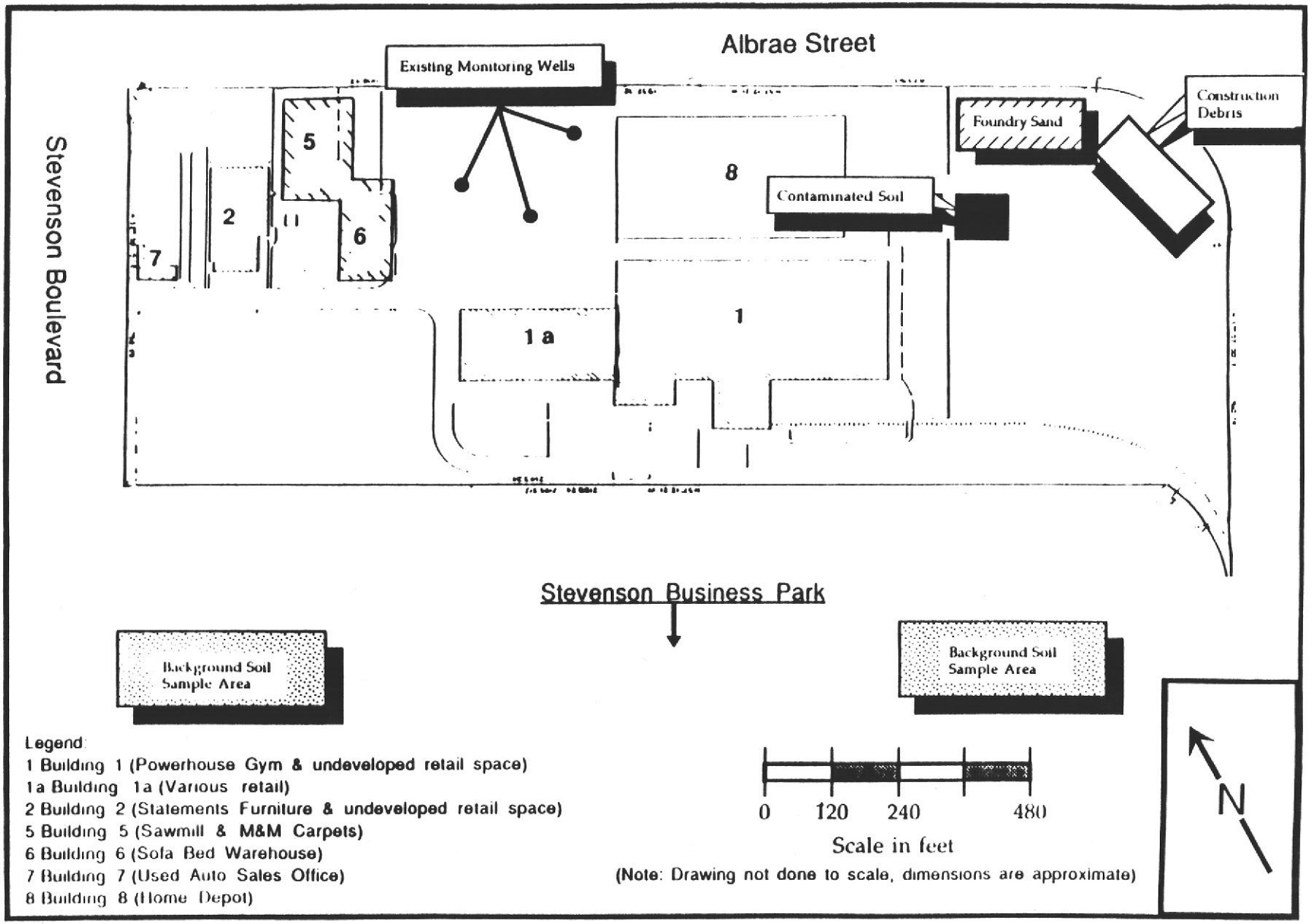

Figure F-1 Site Map

Source: Earth Metrics Incorporated Site Characterzation Report for 6000 Stevenson Boulevard for City of Fremont, February 1988

Printed on 50% recycled paper.

1.0 FOUNDRY SANDS PILE

The foundry sands pile is currently under enforcement action by the Alameda County Department of Environmental Health and the Alameda County District Attorney's Office.

We recommend the following sampling program be undertaken:

- The foundry sands pile should be divided into three equally proportioned areas and 3 subsurface grab soil samples obtained (1 from each area). These samples should be centrally located within the area and taken at a minimum of 2 to 3 feet below the surface as illustrated on Figure F-2. Sampling below the surface will minimize concerns for weathering or cross-contamination by outside sources. This sampling would characterize the pile for HRS purposes only. This sampling would not be sufficient for waste disposal characterization program. However, this sampling could be done in conjunction with such a program.

- Each sample to be taken shall follow standard EPA protocol for sampling, documentation and decontamination as contained in Superfund Field Operations Methods, U.S. EPA 1987c or Volume II of Test Methods for Evaluating Solid Waste, U.S. EPA 1990c or Manual of Groundwater Quality Sampling Procedures, NWWA 1981.

- Each sample should be contained and preserved in an individual sample container following standard EPA protocol (U.S. EPA Region 9 guidance for preparation of sample plans, U.S. EPA April, 1989).

- Each sample shall be analyzed for the parameters as stated on Table F-1 following EPA methods (in accordance with SW846 guidelines).

- QA/QC checks shall be employed to evaluate performance of both field and laboratory procedures. QA/QC checks by use of blank, duplicate and spike samples to enable evaluation of analytical accuracy and precision following standard EPA protocol.

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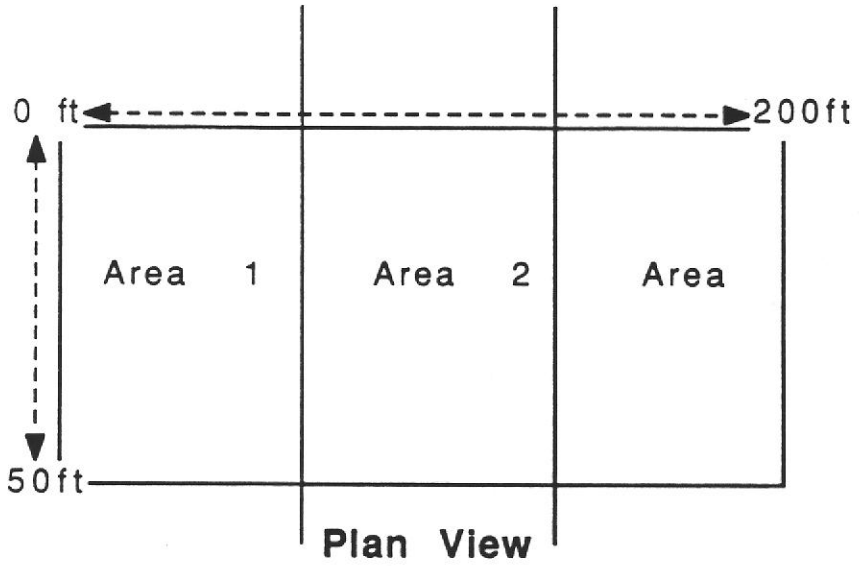
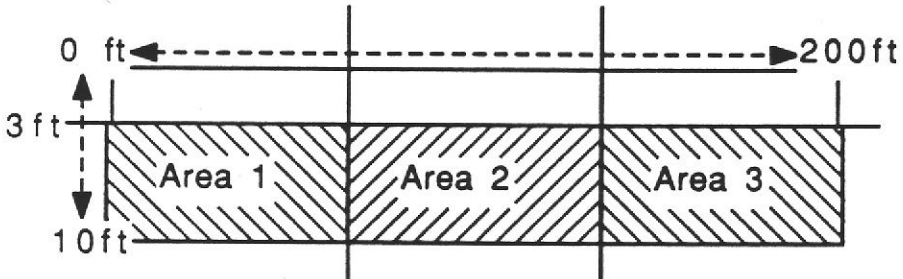


Plan View

Sample locations to be centrally located within each area grid.



Cross-sectional View

Sample depth to be at least 2 to 3 feet below the surface.

Target sample area

(Note: Drawing not done to scale, dimensions are approximate)

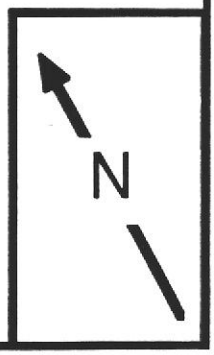


Figure F-2 Foundry Sands Pile Sampling Schematic

Printed on 50% recycled paper.

Table F-1

Analyses Recommendations for the Sobex, Inc. Site

	Priority Pollutant Metals	Volatile Organics	PCBs
EPA Method	200.7/245.1/6010	624/8240/8270	608/8080
Foundry Sands	X		
Contaminated Soil	X	X	X
Construction Debris	X	X	X
Ground-Water	X	X	X
Background Soil	X	X	X
Background Ground-Water	X	X	X

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2.0 CONTAMINATED SOIL PILE (CURRENTLY UNDER BIOREMEDIATION)

This soil pile is currently under review by the Alameda County Water District and the City of Fremont.

We recommend the following sampling program be undertaken:

- The contaminated soil pile should be divided into two equally proportioned areas and 2 subsurface grab soil samples obtained (1 from each area). These samples should be centrally located within the area and taken at a minimum of 2 to 3 feet below the surface as illustrated on Figure F-3. Sampling below the surface will minimize concerns for weathering or cross-contamination by outside sources. This sampling would characterize the pile for HRS purposes only. This sampling would not be sufficient for waste disposal characterization program. These samples could be taken during the sampling proposed in the soon-to-be-submitted sample plan.

- Each sample to be taken shall follow standard EPA protocol for sampling, documentation and decontamination as contained in Superfund Field Operations Methods, U.S. EPA 1987c or Volume II of Test Methods for Evaluating Solid Waste, U.S. EPA 1990c or Manual of Groundwater Quality Sampling Procedures, NWWA 1981.

- Each sample should be contained and preserved in an individual sample container following standard EPA protocol (U.S. EPA Region 9 guidance for preparation of sample plans, U.S. EPA April, 1989).

- Each sample should be analyzed for the parameters as stated on Table F-1 following EPA methods (in accordance with SW846 guidelines).

- QA/QC checks shall be employed to evaluate performance of both field and laboratory procedures. QA/QC checks by use of blank, duplicate and spike samples to enable evaluation of analytical accuracy and precision following standard EPA protocol.

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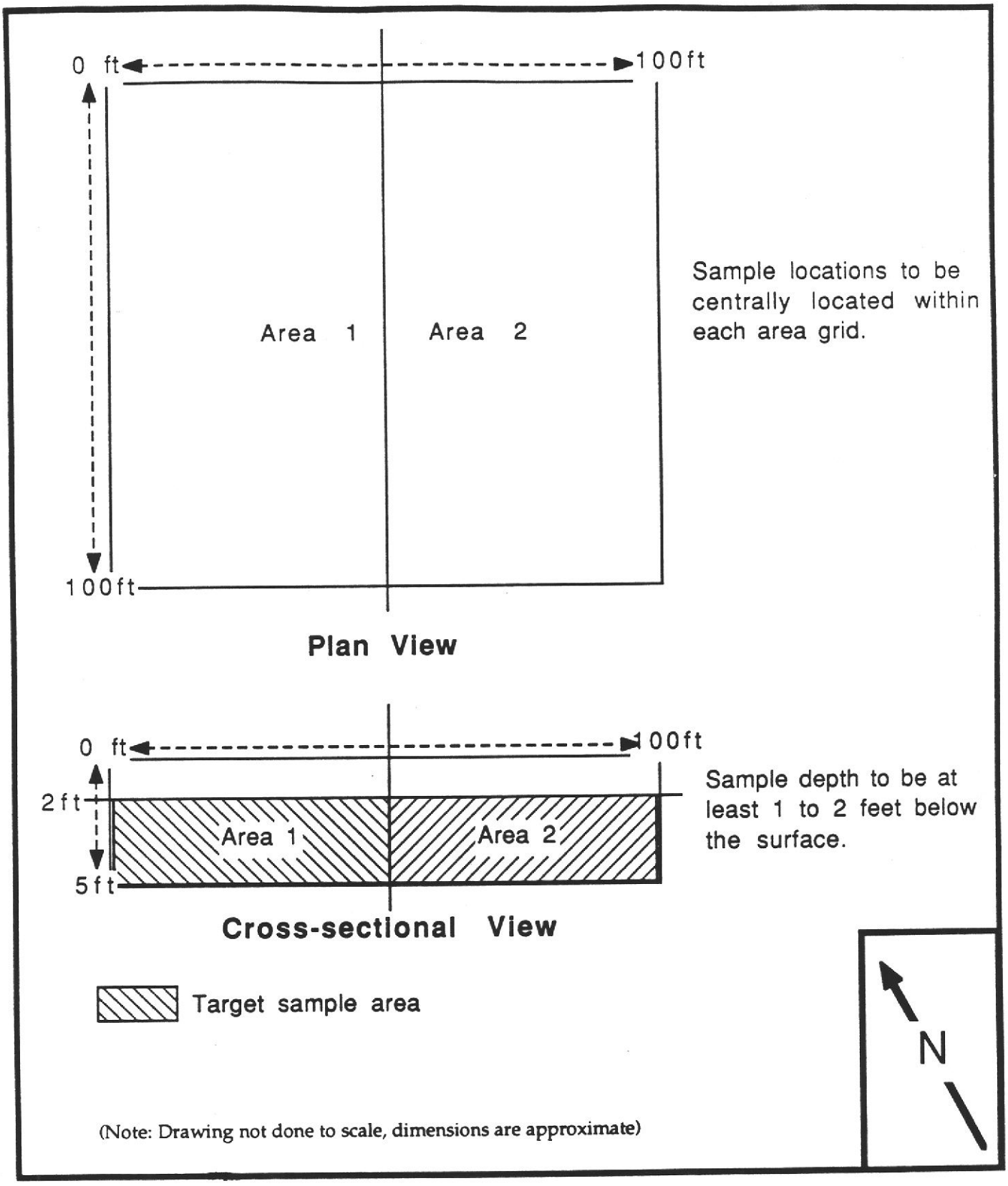

Figure F-3 Contaminated Soil Pile Sampling Schematic

3.0 CONSTRUCTION DEBRIS PILE

The construction debris pile and other general site issues are currently under review by the City of Fremont.

We recommend the following sampling program be undertaken:

- The construction debris pile should be divided into four equally proportioned areas. Two subsurface grab soil samples should be obtained from each area, as illustrated on Figure F-4, for a total of eight samples. These samples should be at a minimum of 2 to 3 feet below the surface. Sampling below the surface will minimize concerns for weathering or cross-contamination by outside sources. This sampling would characterize the pile for HRS purposes only. This sampling would not be sufficient for waste disposal characterization program. However, this sampling could be done in conjunction with such a program.

- The eight samples shall be composited into four for analysis by the laboratory.

- Each sample to be taken shall follow standard EPA protocol for sampling, documentation and decontamination as contained in Superfund Field Operations Methods, U.S. EPA 1987c or Volume II of Test Methods for Evaluating Solid Waste, U.S. EPA 1990c or Manual of Groundwater Quality Sampling Procedures, NWWA 1981.

- Each sample shall be contained and preserved in an individual sample container following standard EPA protocol. (U.S. EPA Region 9 guidance for preparation of sample plans, U.S. EPA April, 1989).

- Each composite sample should be analyzed for the parameters as stated on Table H-1 following EPA methods (in accordance with SW846 guidelines).

- QA/QC checks shall be employed to evaluate performance of both field and laboratory procedures. QA/QC checks by use of blank, duplicate and spike samples to enable evaluation of analytical accuracy and precision following standard EPA protocol.

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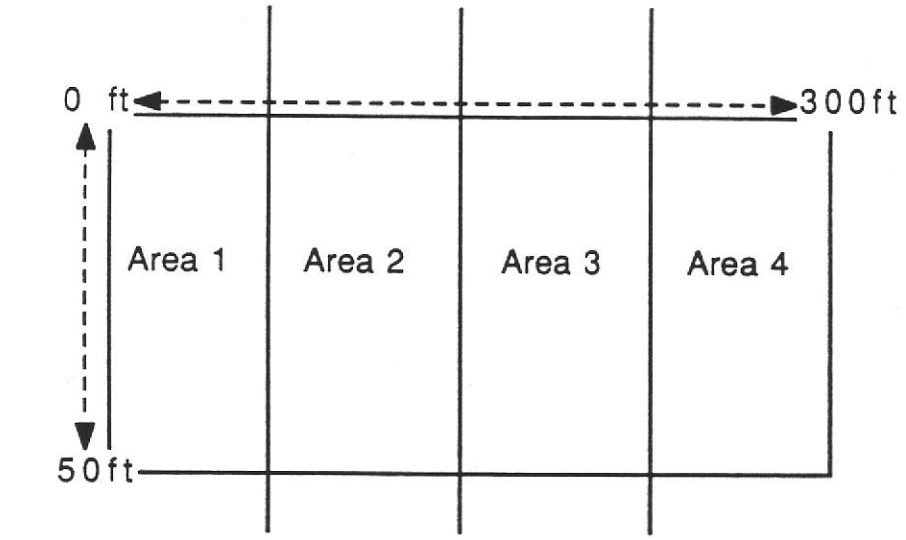
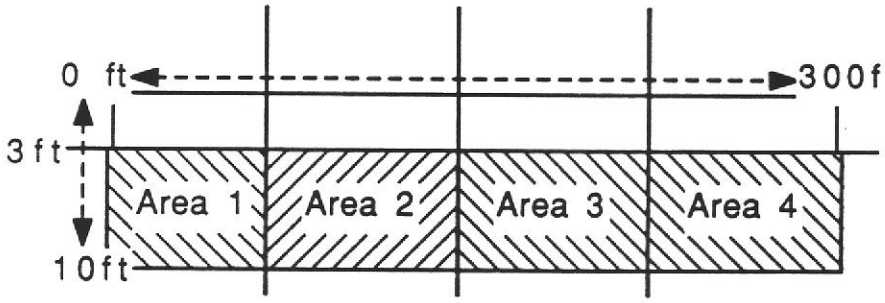


Plan View

Sample locations to be centrally located within each area grid.



Cross-sectional View

Sample depth to be at least 2 to 3 feet below the surface.

Target sample area

N

(Note: Drawing not done to scale, dimensions are approximate)

Figure F-4 Construction Debris Pile Sampling Schematic

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4.0 BACKGROUND SOIL SAMPLES

We recommend that background soil sampling be included as part of the other agency-required soil sampling efforts (i.e., foundry sands, contaminated soil, construction debris). This background information is to complete the HRS evaluation concerning onsite soil contamination.

We recommend the following sampling program be undertaken:

- Two subsurface grab soil samples should be obtained from the neighboring property of the Stevenson Business Park, as illustrated on Figure F-1. These samples shall be taken at 1 to 2 feet below ground surface. This sampling would provide information on background concentrations for HRS purposes.
- Each sample to be taken shall follow standard EPA protocol for sampling, documentation and decontamination as contained in Superfund Field Operations Methods, U.S. EPA 1987c or Volume II of Test Methods for Evaluating Solid Waste, U.S. EPA 1990c or Manual of Groundwater Quality Sampling Procedures, NWWA 1981.
- Each sample should be contained and preserved in an individual sample container following standard EPA protocol (U.S. EPA Region 9 guidance for preparation of sample plans, U.S. EPA April, 1989).
- Each sample should be analyzed for the parameters as stated on Table F-1 following EPA methods (in accordance with SW846 guidelines).
- QA/QC checks should be employed to evaluate performance of both field and laboratory procedures. QA/QC checks by use of blank, duplicate and spike samples to enable evaluation of analytical accuracy and precision following standard EPA protocol.

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5.0 ONSITE GROUND-WATER WELLS

Ground-water quality assessment is currently under review by the Alameda County Water District and the Regional Water Quality Control Board to determine the necessity and extent of a ground-water investigation program.

We recommend the following sampling program be undertaken:

- Three ground-water samples should be obtained, with one sample being taken from each of the three onsite ground-water monitoring wells.
- These three samples should be taken from the wells as indicated on Figure F-1. These samples will provide information regarding localized ground-water quality for HRS purposes only. This sampling would not be sufficient for a site ground-water characterization program. However, this sampling could be done in conjunction with such a program.
- Each sample to be taken shall follow standard EPA protocol for sampling, documentation and decontamination as contained in Superfund Field Operations Methods, U.S. EPA 1987c or Volume II of Test Methods for Evaluating Solid Waste, U.S. EPA 1990c or Manual of Groundwater Quality Sampling Procedures, NWWA 1981.
- Each sample should be contained and preserved in an individual sample container following standard EPA protocol (U.S. EPA Region 9 guidance for preparation of sample plans, U.S. EPA April, 1989).
- Each sample should be analyzed for the parameters as stated on Table F-1 following EPA methods (in accordance with SW846 guidelines).
- QA/QC checks should be employed to evaluate performance of both field and laboratory procedures. QA/QC checks by use of blank, duplicate and spike samples to enable evaluation of analytical accuracy and precision following standard EPA protocol.

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6.0 BACKGROUND GROUND-WATER SAMPLES

Ground-water quality is currently under review by the Alameda County Water District and the Regional Water Quality Control Board along with the onsite ground-water quality.

We recommend the following sampling program be undertaken:

- Three background ground-water samples should be obtained, two upgradient and one downgradient of the site, from the same saturated zone as the wells onsite (approximately 25 feet in depth). These wells should also be outside the influence of other possible contamination. From a phone conversation on 19th September 1991 with Linda Vrabel of City of Fremont, Public works Department, Hazardous Materials Division, she informed me of a former drum storage area on the north side of Albrae Street.

- The locations of these wells can be determined by reviewing data from existing wells in the area. New monitoring wells may be required to be drilled if no equivalent wells for background data are found.

- Each sample to be taken shall follow standard EPA protocol for sampling, documentation and decontamination as contained in Superfund Field Operations Methods, U.S. EPA 1987c or Volume II of Test Methods for Evaluating Solid Waste, U.S. EPA 1990c or Manual of Groundwater Quality Sampling Procedures, NWWA 1981.

- Each sample should be contained and preserved in an individual sample container following standard EPA protocol (U.S. EPA Region 9 guidance for preparation of sample plans, U.S. EPA April, 1989).

- Each sample should be analyzed for the parameters as stated on Table F-1 following EPA methods (in accordance with SW846 guidelines).

- QA/QC checks should be employed to evaluate performance of both field and laboratory procedures. QA/QC checks by use of blank, duplicate and spike samples to enable evaluation of analytical accuracy and precision following standard EPA protocol.

This summarizes our recommendations to assist in completion of the EPA's HRS analysis during the Site Inspection process.

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Appendix G

HISTORICAL PROPERTY USE

This appendix provides an overview of the historical use of the property, now called the Sobex, Inc. site, from 1963 through 1988. A chronological history of the property use is as follows:

1. The property was undeveloped before 1963 when it was purchased by Pullman Trailmobile. Pullman manufactured a variety of shipping containers, closed truck vans, large long-haul trailers, and related vehicle trailers for the trucking and transportation industries. Pullman built four buildings, as shown on Figure G-1. Building 1 was the main manufacturing center, Building 2 was the main office, Building 3 was the trailer painting center, and Building 4 was the maintenance shop. Pullman Trailmobile moved its operations to Fresno, California, in 1976 (6).

2. Mr. Dale Sobek purchased the property in May 1978 and still owns it (5, 9).

3. Beginning in June 1978 and continuing to December 1979, Buildings 1 and 2, shown on Figure G-2, were leased to Polymir Industries. This company manufactured polyurethane foam insulation board and various other foam products. Polymir Industries entered into voluntary bankruptcy in September 1978 (6).

4. From September 1978 to December 1979, Mr. Sobek continued Polymir's operations on the property as the Dale W. Sobek Company. An auction was held and all materials and equipment were removed by the Federal Bankruptcy Court in December 1979 (6).

5. From June, 1978 to October, 1983 the Golden Gate Auto Auction leased Building 1a and the area which is shaded on Figure G-2. Golden Gate Auto Auction used this area as an auto auction yard where 2,000 to 4,000 cars were parked. The Golden Gate Auto Auction installed an underground gasoline storage tank for its use. During removal of this tank in 1985, soil tests were conducted and gasoline indicators (benzene, toluene and xylene) were found (10). These laboratory results were presented to the City of Fremont, Public Works Department, Hazardous Materials Division, in May 1985 (6).

6. California Oil Recyclers leased Building 4 (Figure G-2) from June 1978 to December 1981. This company reclaimed oil from gasoline stations and stored it in above-ground, 12,000-gallon storage tanks. Oil was also mixed with diesel and stored above ground. These reclaimed products were then resold in bulk for various fuel oil usages. California Oil Recyclers was evicted in 1981 due to poor operational practices (6). California Department of Health Services' Preliminary Assessment (3, 11) provides evidence indicating polychlorinated biphenyls may have been present.

7. Peterbilt Engineers, a division of Paccar Corporation, leased Building 2 (Figure G-2) from April 1979 to May 1987. This building was used as an engineering office and storage for computer tapes and parts drawings (6).

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8. Sobex, Inc., a chemical consulting firm, leased Building 3 (Figure G-3) from May 1980 to January 1984 when the business was dissolved and ceased operations at the property (6).

9. Raychem Corporation leased Building 1 (Figure G-3) from April 1980 to May 1987. Raychem used this building as a warehouse to supply six manufacturing plants in the Bay area. Items such as furniture, equipment, packaged goods, palletized dry plastics, and packaging supplies were shipped in and out of this warehouse daily (6).

10. In 1980, Building 5 (Figure G-3) was constructed and leased to Design Spec. Design Spec was a contract manufacturer of hotel and motel furniture. It also fabricated, distributed, and sold retail wood furniture. Design Spec moved out about 1982 (6). It has been occupied by various retail establishments since then.

11. In 1980, Building 6 (Figure G-3) was constructed and leased to Sofabed Warehouse, a retail/wholesale furniture company that assembles and markets pre-manufactured pieces, and distributes and displays furniture. Sofabed Warehouse still occupies Building 6 (5, 6).

12. Building 7 (Figure G-3) was built by Mr. Sobek in 1981 as an office building and is still used for that purpose. One office is leased to Allstate Insurance. Another office is leased to LJP Marketing Company. Both are sales offices (5, 6).

13. Building 1a (Figure G-1) has housed various retail businesses from 1983 to present (5, 6).

14. Building 4 (Figure G-3) was leased to Comstock Roofing Company from February 1983 to February 1984. Comstock Roofing used the building to warehouse and distribute new roofing materials, including shakes, shingles, roofing paper, adhesive, mastics and fabricated metal components (6).

15. Building 8 houses Home Depot (3, 6), a home improvement store, which occupied the newly constructed Building 8 in January 1987 (6). Buildings 3 and 4 (Figure G-3) were demolished to allow for Home Depot's parking lot (6).

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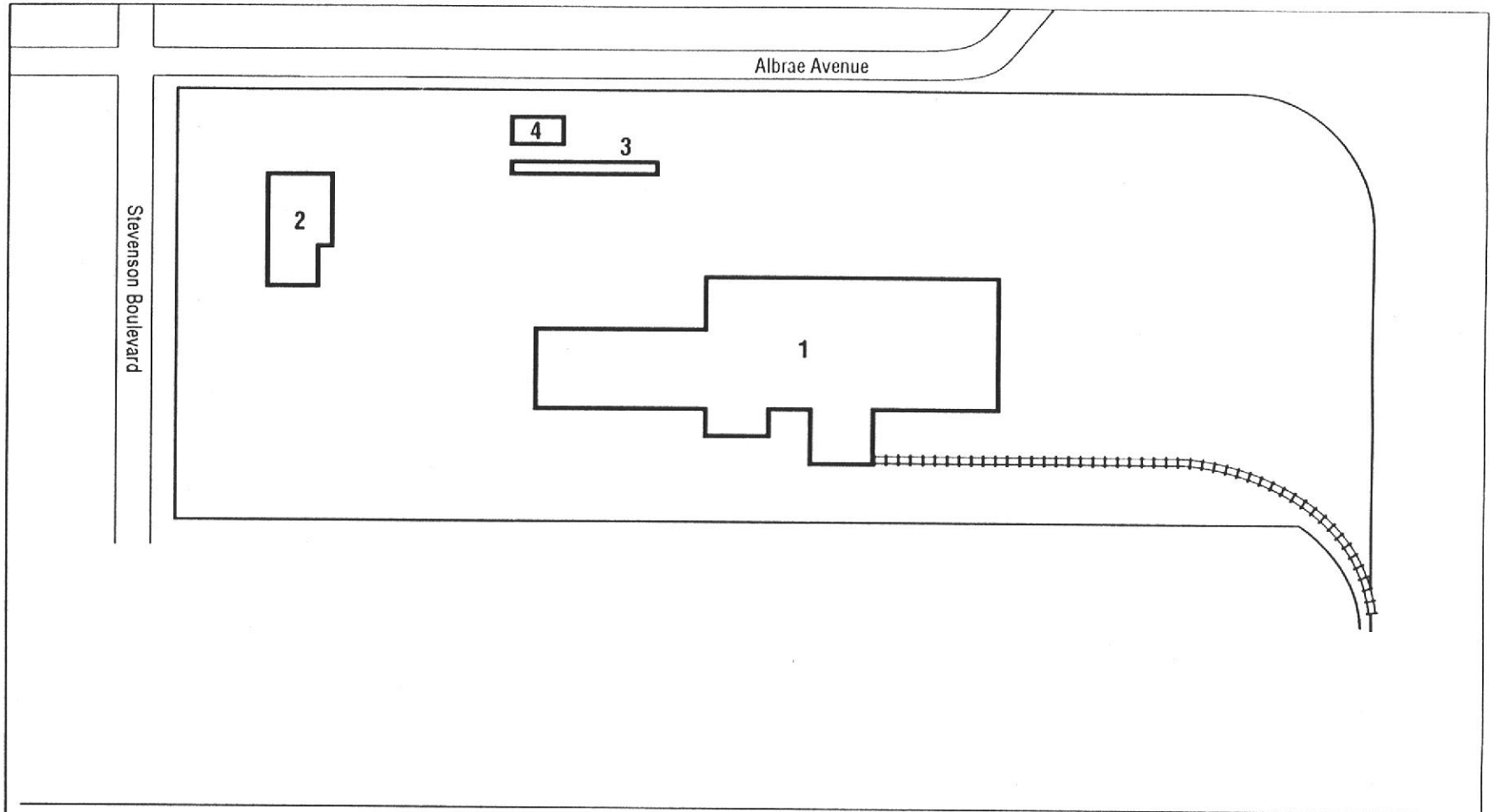

Legend:

1 = Building 1 Manufacturing Center – Pullman Trailmobile (1963-1976)

2 = Building 2 Office Space – Pullman Trailmobile (1963-1976)

3 = Building 3 Trailer Painting – Pullman Trailmobile (1963-1976)

4 = Building 4 Maintenance Shop – Pullman Trailmobile (1963-1976)

Source: Earth Metrics Incorporated Site Characterization Report for 6000 Stevenson Boulevard for City of Fremont, February 1988

Figure G-1 Site Map (1963-1978)

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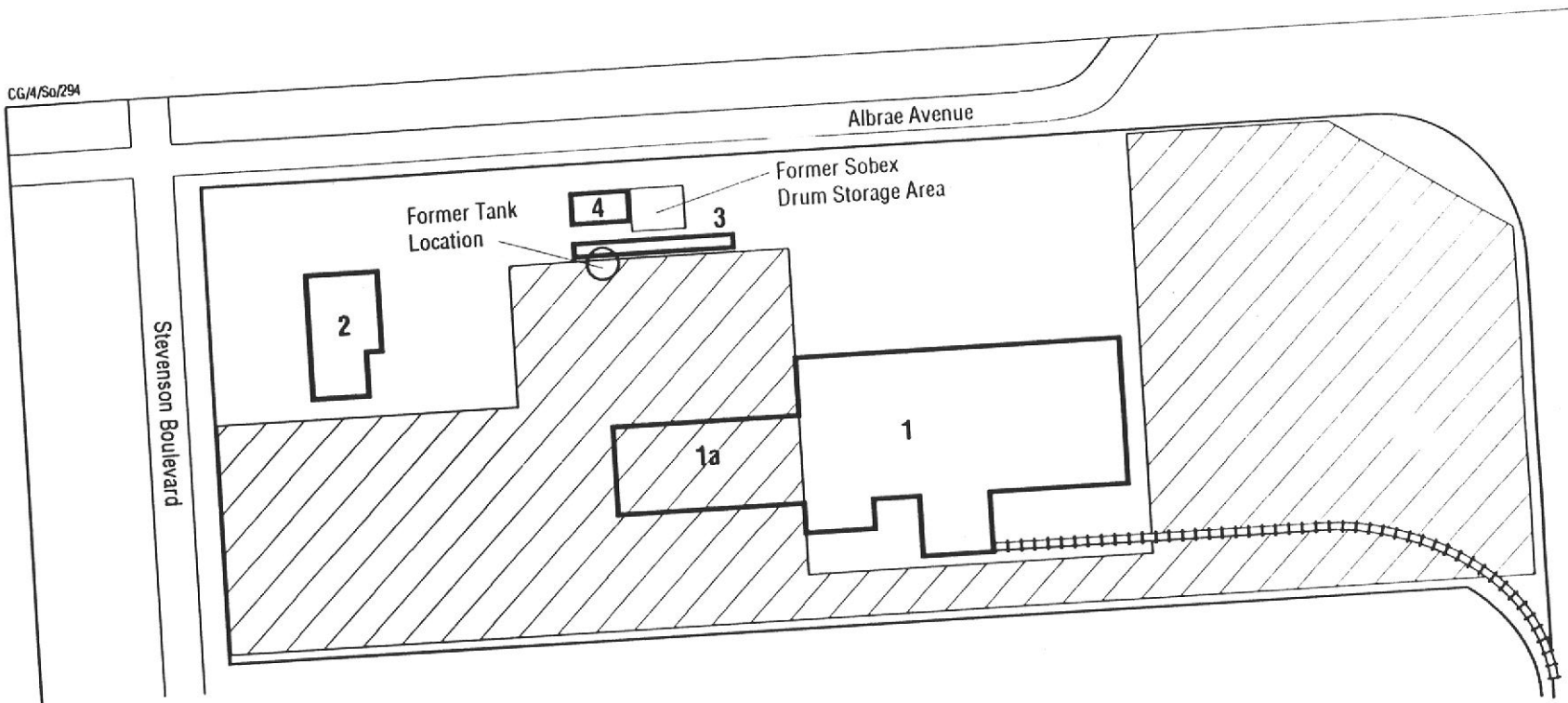

Legend:

1 = Building 1 Polymir Industries (1978-1979)
1a = Building 1a Golden Gate Auto Auction (1978-1983)
2 = Building 2 Polymir Industries (1978-1979), Peterbilt Engineers (1979-1987)
3 = Building 3 Empty (1976-1980)
4 = Building 4 California Oil Recyclers (1978-1981)

Golden Gate Auto Auction leased property (1978-1983)

N

0 100 200

Approximate scale in feet

Source: Earth Metrics Incorporated Site Characterization Report for 6000 Stevenson Boulevard for City of Fremont, February 1988

Figure G-2 Site Map (1978-1980)

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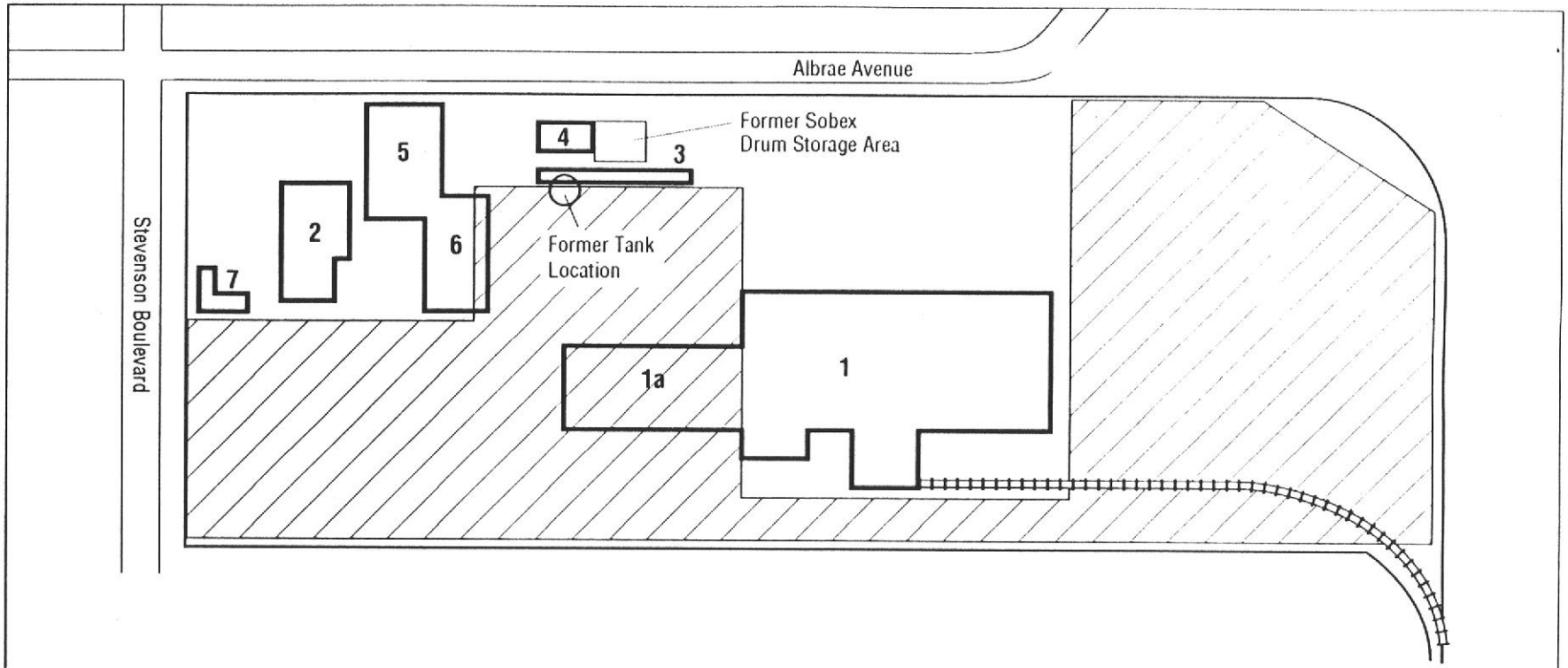

Legend:

1 = Building 1 Raychem (1980-1987)
1a = Building 1a Golden Gate Auto Auction (1978-1983), Various retail (1983- present)
2 = Building 2 Peterbilt Engineers (1979-1987), Various Retail (1987- present)
3 = Building 3 Sobex Inc. (1980-1984), Empty (1984-1987), Demolished 1987
4 = Building 4 Empty (1981-1983), Comstock Roofing (1983-1984), Empty (1984-1987), Demolished 1987
5 = Building 5 Constructed 1980, Various Retail (1980- present)
6 = Building 6 Constructed 1980, Various Retail (1980- present)
7 = Building 7 Office Building, Built 1981

Golden Gate Auto Auction leased property (1978-1983)

N

0 100 200

Approximate scale in feet

Source: Earth Metrics Incorporated Site Characterization Report for 6000 Stevenson Boulevard for City of Fremont, February 1988

Figure G-3 Site Map (1980-1987)

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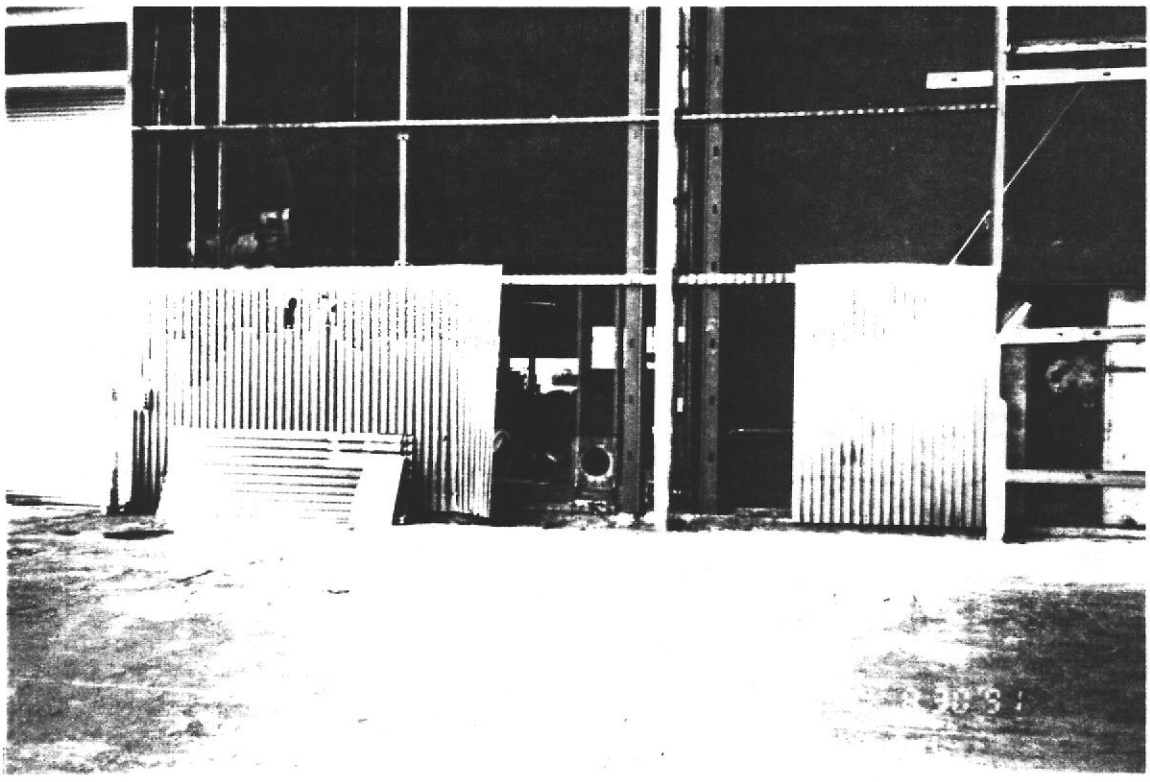
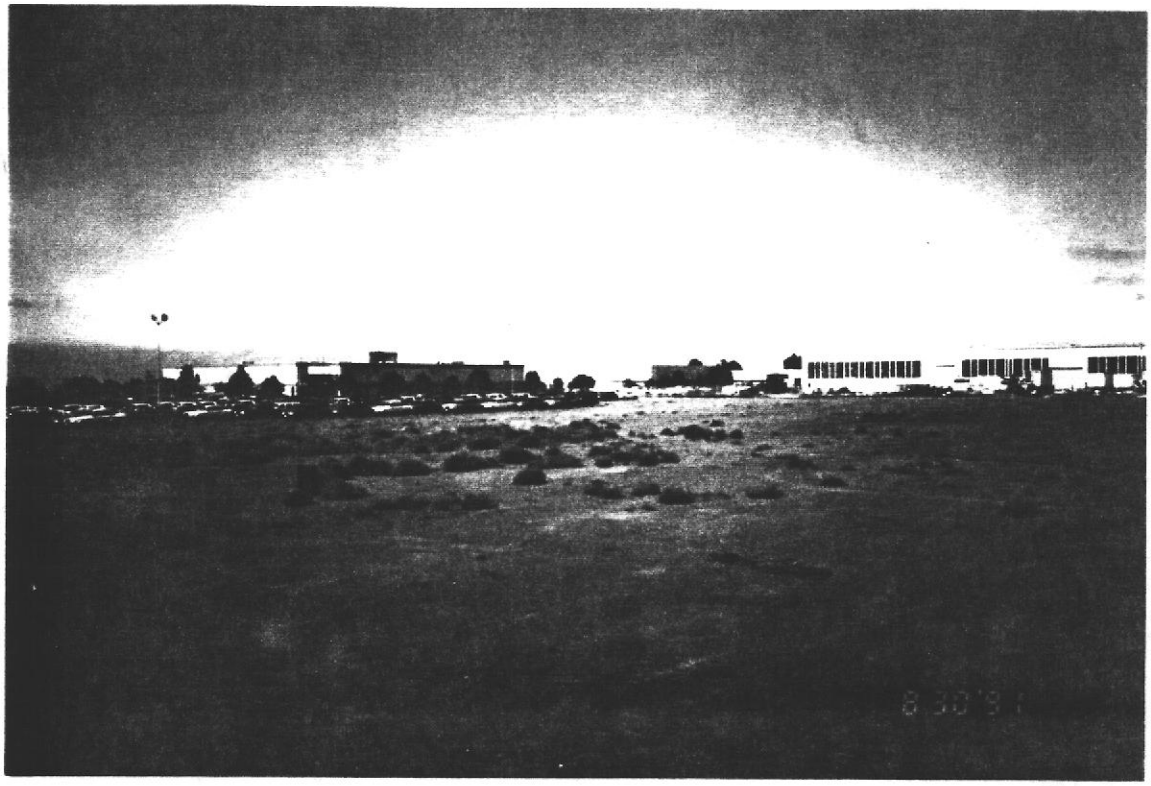
1. Looking south at east side of Building 1



2. Looking east at east interior of Building 1

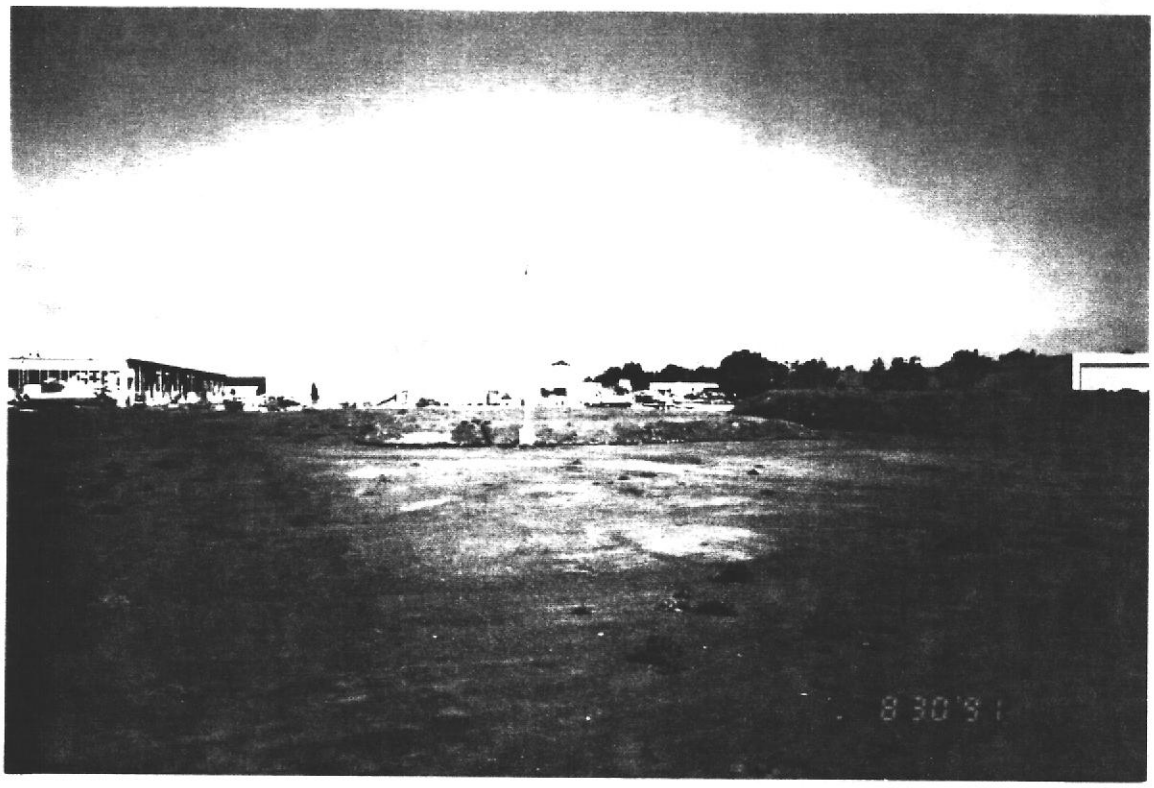
3. Looking north at east side of Building 1 (Building 1 on the left, Building 6 in center background, and Building 8 on the right)

4. Looking west from south edge of property (from left to right: drainage ditch, railroad tracks, Celotex roofing plant in background, and Golden Gate Auto Auction storage)

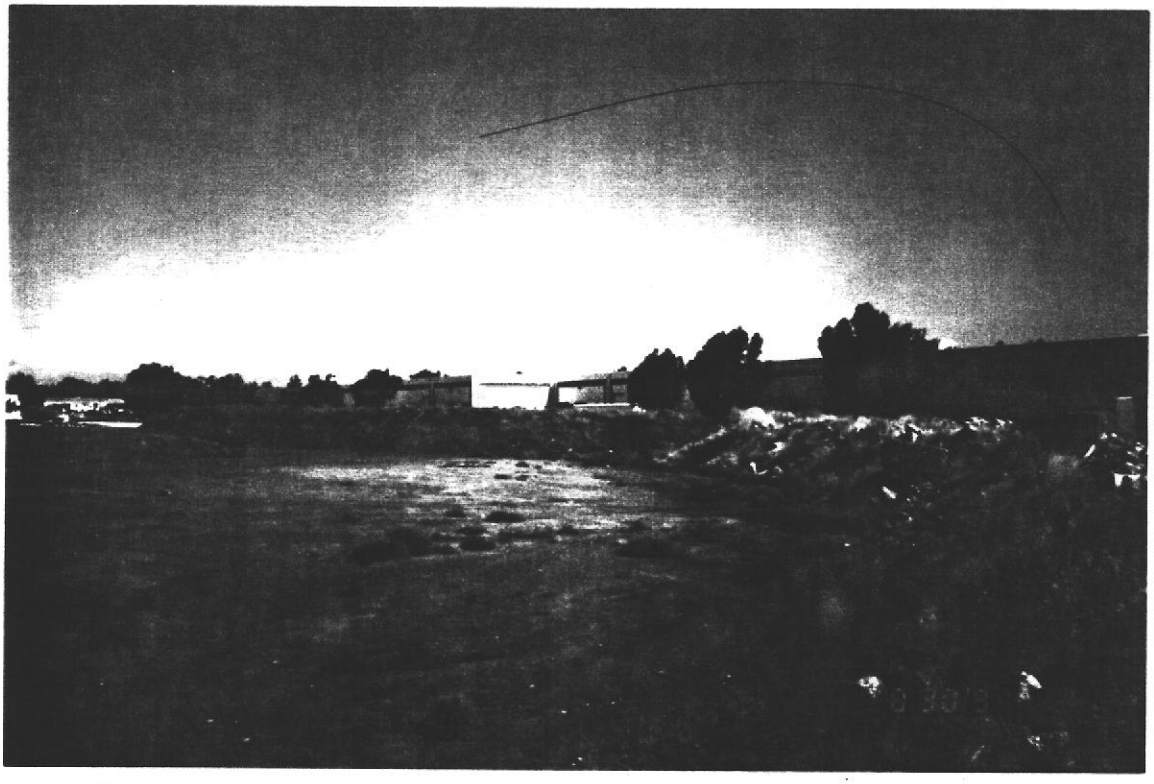


5. Looking northwest from south edge of property (from left to right: Golden Gate Auto Auction storage, florist wholesale and light industry off Encyclopedia Circle in background, and Building 1)

6. Looking north from south edge of property (from left to right: light industry off Encyclopedia Circle in background, Building 1, and Building 6; center background: Home Depot Building 8 and contaminated soil pile by lightpole)

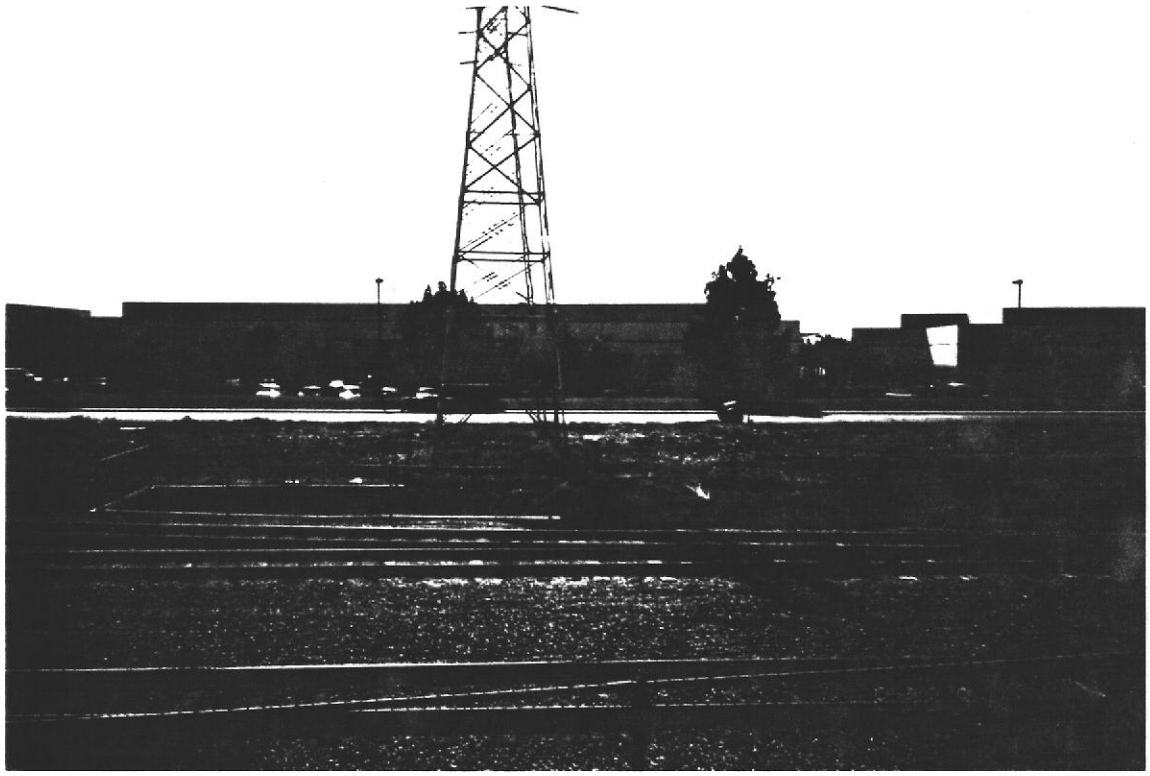


7. Looking north from south edge of property (from left to right: Building 1, and Building 6; background: Home Depot Building 8, contaminated soil pile by lightpole, and foundry sandpile to far right with Office Club behind)

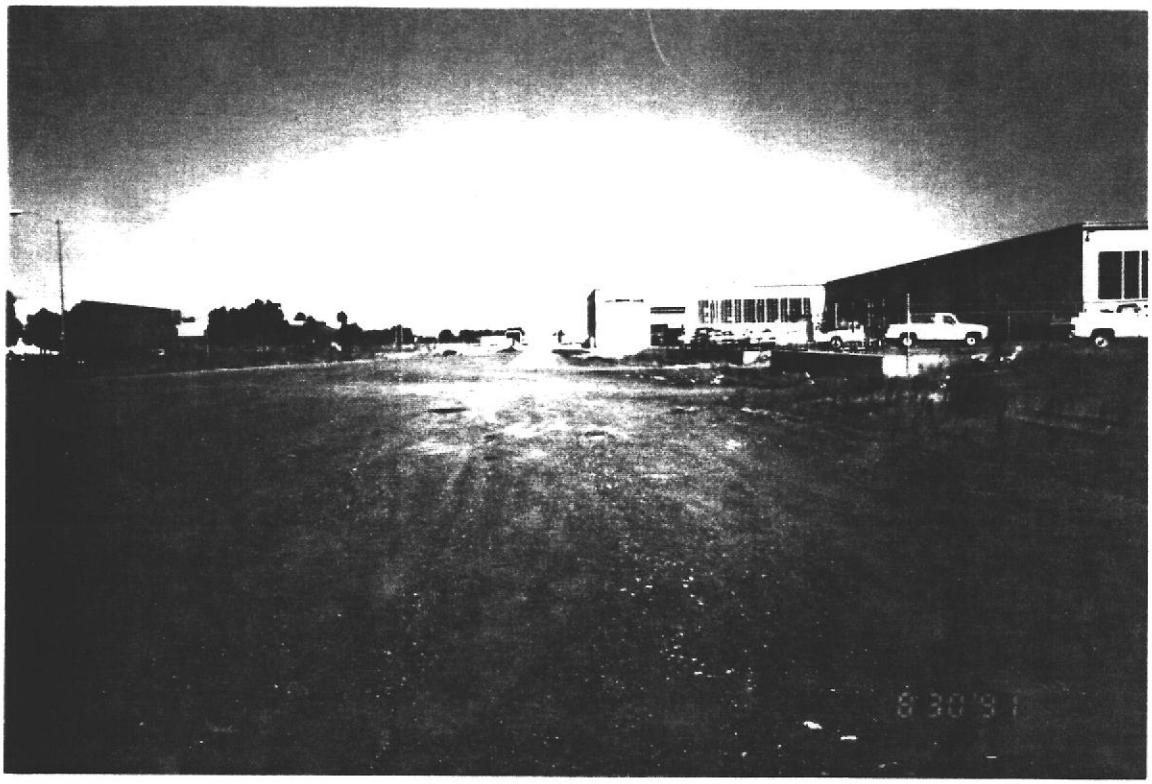


8. Looking northeast from south edge of property (from left to right: contaminated soil pile, foundry sandpile in the center, with construction debris to the right and Office Club behind)

9. Looking south (construction debris in foreground, with Pacific Business Center behind)



10. Looking south from south edge of property (from front to back: railroad tracks running along south edge of property, drainage ditch running along south edge of property, and Pacific Business Center behind)



11. Looking north from southwest corner of property (from left to right: light industry off Encyclopedia Circle, trailer storage in center background, and west side of Building 1)