



DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

October 7, 1992

Richard Hiett
Regional Water Quality Control Board
2101 Webster St., 4th Floor
Oakland CA 94612

RE: Pacific Trust
21450 Mission Blvd.
Hayward CA 94541
REQUEST FOR SITE CLOSURE

Dear Mr. Hiett:

I have reviewed the closure request and other information submitted by Pacific Trust for the above referenced site. Copies of correspondence and reports pertaining to the operation and removal of underground fuel tanks and the subsequent soil contamination investigation that apparently have not been supplied to your office are enclosed.

Although sampling done in 1990 showed that some soil contamination occurred at this site, I recommend that the Board consider this site for closure. In December, 1991, a supplemental investigation was carried out that indicates that the contamination found at the site is unlikely to present a threat to groundwater. Below is a summary of the findings in this case:

1. 1990 soil sampling done in the immediate area of the former kerosene tank indicates that diesel range petroleum hydrocarbons exist at levels between 0 - 170 ppm. Some overexcavation of contaminated soil was done, but confirmatory sampling indicated that detectable levels remained. Follow-up sampling was done via a boring to 27' in the former tank pit area, but these samples indicated that TPH levels were not dropping significantly with depth.
2. In December, 1991, eight soil samples were retrieved from a boring beneath the former kerosene tank pit. These samples were taken at 5' intervals from 30' to 65'. No detectable levels of petroleum hydrocarbons were found. Also, 1991 boring log data supports the case that groundwater at the site is below 60'. Furthermore, December 1991 data shows that at least 7' of clay soil was found immediately above the groundwater level.

Richard Hiett - RWQCB
RE: 21450 Mission Blvd., Hayward
October 7, 1992
Page 2 of 2

A similar clay layer was reported in another nearby deep boring done in 1990. Data from these two borings indicate that a 30' separation and an aquitard thicker than 5' exist between the last known contamination and groundwater.

3. While some contaminated soil was left in place in the area of the former kerosene tank, petroleum levels were low (less than 200 ppm in all cases). As well, this tank was quite small, approximately 80 gallons.

Please contact me with any questions or concerns you may have about the site.

Sincerely,



Pamela J. Evans
Senior Hazardous Materials Specialist

c: Leonard R. Overholser, Pacific Trust
Valentin Constantinescu, Environmental Geosciences
Engineering



92 APR 23 11 2: 18

April 21, 1992

fair
Mr. Tom Peacock
Alameda County Health Care Services Agency
80 Swan Way, Room 200
Oakland, CA 94621

Re: Request for Case Closure, 21450 Mission Blvd., Alameda County
(unincorporated), CA

Dear Mr. Peacock:

Pacific Trust Company is petitioning the Alameda County Health Care Services Agency (ACHCSA) for a recommendation to the Regional Water Quality Control Board (RWQCB) for case closure in the matter of the above referenced property. A request for case closure was previously submitted to Pamela Evans of the ACHCSA. Ms. Evans upon consultation with the RWQCB, replied that "the San Francisco Bay Regional Board may allow closure in cases such as yours" (Pacific Trust) "without installation and monitoring of wells when either or both conditions listed below exist:

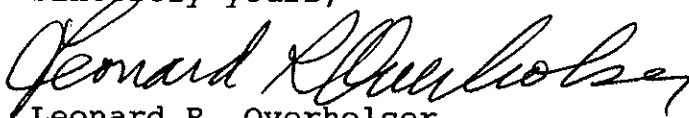
1. A continuous aquitard (soil layer impermeable to groundwater) of at least five feet thickness has been shown through boring log data to exist between the deepest known soil contamination and first groundwater.
2. Deepest known soil contamination and first groundwater are separated by a distance of twenty feet."

Pacific Trust Company retained Environmental Geosciences Engineering (EGE), the California division of Water Resources Associates, Inc., to perform the scope of work approved by Ms. Evans for satisfying the above quoted conditions. The EGE report, dated December 18, 1991, has previously been submitted to the ACHCSA and the RWQCB. The report, including certified analytical results, lithologic log and chain of custody documentation, certified by a California Certified Engineering Geologist, provides all the requested technical documentation to satisfy the ACHCSA/RWQCB conditions for case closure.

Mr. Tom Peacock
April 21, 1992
Page Two

Having satisfied the referenced criteria, Pacific Trust herewith respectfully requests timely closure of this case. Should you have any questions, please call.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Leonard R. Overholser".

Leonard R. Overholser
Vice President/Manager

LRO:bs0

 Pacific
Trust
Company

July 14, 1992

Pamela J. Evans
Hazardous Materials Specialist
Alameda Department of Environmental Health
80 Swan Way, Room 200
Oakland, California 94621

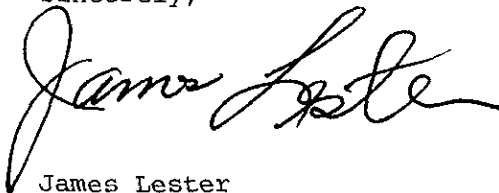
Re: 21450 Mission Blvd., Hayward, CA 94541

Dear Ms. Evans:

Per your conversation with Len Overholser of this office, enclosed is our check for \$500.00 for deposit covering processing fees to closure on the above referenced property.

If you have any questions, or need additional information, please contact us.

Sincerely,



James Lester
Assistant Vice President

Encl.

1245 South Winchester Boulevard, San Jose, California 95128 (408) 244-9605



Environmental Geosciences Engineering

a division of Water Resources Associates, Inc. Phoenix, Arizona

91 OCT 15 11:31

October 11, 1991

Ms. Pamela Evans
ACHCSA
80 Swan Way, Rm. 200
Oakland, CA 94621

Subject: ACHCSA Letter of October 8, 1991 Regarding 21450 Mission Blvd., Alameda County (unincorporated), CA

Dear Ms. Evans:

Environmental Geosciences Engineering (EGE) has reviewed your letter of 8 October 1991 and wishes to clarify statements provided therein. It is appropriate to review definitions contained within California Code of Regulations Title 23, Chapter 16 prior to clarification of the Alameda County Health Care Services Agency (ACHCSA) statements. As provided in CCR Title 23, Chapter 16, Section 2611, "First ground water" means the uppermost saturated horizon encountered in a bore hole. "Ground water" means subsurface water which will flow into a well.

A series of lithologic logs have been presented to both the ACHCSA and the Regional Water Quality Control Board (RWQCB) in a report prepared by Christopher M. French, R.G. ("Underground Storage Tank Closure Report, Hayward Motors, 21450 Mission Blvd., Alameda County, CA"), dated 2 October, 1991. The log for Boring B-1 clearly shows that first encountered groundwater occurs at 60.5 feet. This groundwater is overlain by a clay layer 5.5 feet in thickness. The groundwater is under considerable potentiometric pressure.

The deepest two soil samples collected beneath the site show nondetectable concentrations for all analyzed constituents. This data is verified from two separate borings. One boring was located within one foot of the former tank. The other boring was located within ten feet of the tank. "Groundwater" (CCR Title 22, Section 2611) first entered borehole B1 at 60.5 feet. That the clay horizon above groundwater is an aquitard is irrefutable, as it is not possible to generate positive pressure head in a confined aquifer without the presence of an aquitard. Therefore, the statement provided on line 3, paragraph 3 of your letter, which states that "boring log data from the site does not document the presence of a five foot thick aquitard between soil contamination and groundwater," is not corroborated by the factual technical documentation.

Accordingly, the basis for a decision supporting case closure, provided in Item 1 of your

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



Telephone Number: (415)

October 8, 1991

Lester Feldman
Regional Water Quality Control Board
2101 Webster St., 4th Floor
Oakland CA 94612

RE: Pacific Trust Site, 21450 Mission Blvd., Hayward CA 94541

Dear Mr. Feldman:

I have reviewed the Request for Case Closure submitted to the Board by Environmental Geosciences Engineering, Inc. Below I have outlined my reservations regarding site closure:

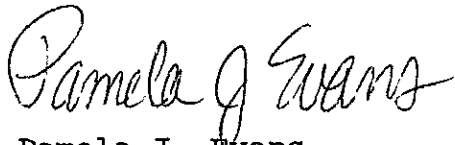
Last spring I informed the responsible party that further investigation of the depth of soil contamination beneath the former kerosene tanks was needed before the case could be referred to the RWQCB for closure. I specified that soil sampling results showing a drop of contaminants to nondetectable levels within a few feet of the base of the former tank pit could present a convincing argument for case closure. Subsequently, soil sampling was carried out beneath the former tank via a 30 foot soil boring. Chemical analyses of soil from depths of 6, 12, 16, 21, and 27 feet showed that petroleum hydrocarbon contamination was present in all samples, with concentrations ranging from 40 to 170 ppm Total Extractable Petroleum Hydrocarbons. These results do not indicate that contaminant levels drop significantly with depth beneath the former tank. In fact, a non-detect level was never reached in the boring.

After reviewing the investigation report, I discussed site conditions with Richard Hiatt of your Board. He concurred with me that boring log data from the site does not document the presence of a five foot thick aquitard between soil contamination and groundwater, whether it occurs at 30 or 60 feet. In fact, log data indicates that soils at the site are permeable. Also, assuming that the zone of near-saturation found to occur at about 30 feet at the site is not actually a perched aquifer, and that the groundwater level at the site is, in fact, at about 60 feet, it has not been demonstrated that a 20 foot separation exists between last known contamination (currently 73 ppm at 27') and groundwater. Contamination may exist deeper in the boring than 27 feet, where the last sample was taken.

Lester Feldman
Regional Water Quality Control Board
October 8, 1991
Page 2 of 2

Under these circumstances, I feel it is not possible for me to recommend closure of this site to your Board. You may contact me with any questions at (415)271-4320.

Sincerely,

A handwritten signature in cursive script that reads "Pamela J. Evans".

Pamela J. Evans
Hazardous Materials Specialist

c: Eddy So, RWQCB
Leonard Overholser, Pacific Trust
Chris French, Environmental Geosciences Engineering, Inc.



ENVIRONMENTAL GEOSCIENCES ENGINEERING, INC.

a division of Water Resource Associates, Inc. • Phoenix, AZ

September 18, 1991

Ms. Pamela Evans
ACHCSA
80 Swan Way, Rm. 200
Oakland, CA 94621

VIA HAND DELIVERY

Subject: Petition for Case Closure, 21450 Mission Blvd., Alameda County
(unincorporated), CA

Dear Ms. Evans:

Environmental Geosciences Engineering, Inc. (EGE) has assumed the role of technical consultant for Pacific Trust Company regarding closure of 21450 Mission Blvd., Hayward, California. EGE has reviewed your letter of August 14, 1991 regarding closure of the site. In your letter, you have indicated that "the San Francisco Bay Regional Board may allow closure in cases such as yours" (Pacific Trust Company) "without installation and monitoring of wells when either or both conditions listed below exist:

1. A continuous aquitard (soil layer impermeable to groundwater) of at least five feet thickness has been shown through boring log data to exist between the deepest known soil contamination and first groundwater.
2. Deepest known soil contamination and first groundwater are separated be a distance of twenty feet."

We are very pleased to inform you that both of these conditions have been met: 1) the hydrogeologic setting, illustrated in Figure 2 of the EIRRA report dated 14 June, 1991 and incorporated herein as Attachment A by reference, has illustrated that the site is underlain by a five foot thick clay aquitard, beneath which first encountered groundwater within a confined aquifer is present with a piezometric surface higher than the confining horizon; and 2) the deepest known contamination at 27 feet, as verified by the presence of nondetectable concentrations at 30 feet from two separate boreholes, overlies first detected groundwater at a depth of 61 feet by a vertical separation of 34 feet.

As both of your referenced criteria have been met, we are respectfully requesting that

200 Brown Road, Ste. 210
Fremont, CA 94539
(510) 770-5733 • fax: (510) 770-5752

Irvine, CA

Phoenix, AZ

Denver, CO



Ms. Pamela Evans
ACHCSA
September 18, 1991
Page 2

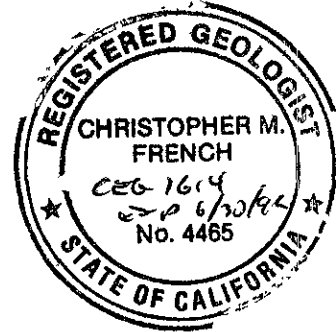
you immediately and without any further conditions submit a petition for case closure to the RWQCB. Please be informed that the continued absence of case closure constitutes a grave obstacle to the execution of the business duties and obligations of our client, Pacific Trust Company of San Jose, California. Pacific Trust has indicated that any further delay beyond September 30, 1991 in obtaining site closure will seriously impede legal resolution and release of the trust property.

Should you have any questions, please call.

Very truly yours,

ENVIRONMENTAL GEOSCIENCES ENGINEERING, INC.

Christopher M. French, C.E.G., R.E.A.
Principal Scientist



Mr. Jim Burgard, P.E.
Vice President

CMF/JB/ic

Attachments (2)

cc: Mr. Lester Feldman, RWQCB
Mr. Len Overholser, Pacific Trust

200 Brown Road, Ste. 210
Fremont, CA 94539
(510) 770-5733 • fax: (510) 770-5752

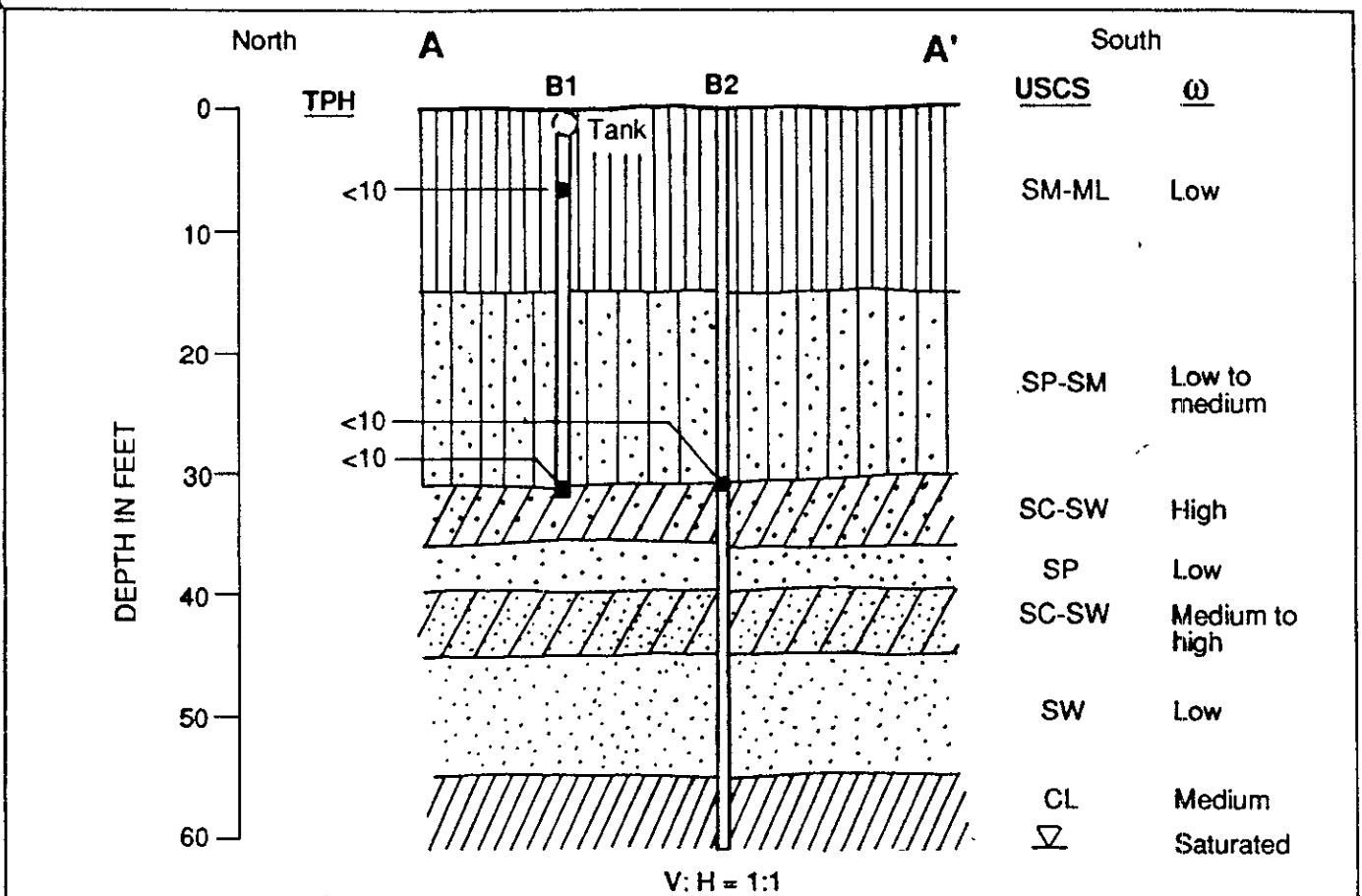
Irvine, CA

Phoenix, AZ

Denver, CO

ATTACHMENT A

Plate



EXPLANATION

○ 80 gallon diesel tank (base of tank at 2.0 feet)

USCS United Soil Classification System

- ML-SM: Silt to Silty Sand
- SM-SP: Silty Sand to Sand
- SC-SW: Clayey Sand to Sand
- SP: Sand, poorly graded
- SW: Sand, well graded
- CL: Clay

▽ Water table

TPH Total petroleum hydrocarbons (medium boiling point)

ω Volumetric water content (qualitative measure)

GEOLOGIC CROSS SECTION

Pacific Trust Company

EIRRA CONSULTANTS

ENVIRONMENTAL INVESTIGATION, REMEDIATION, AND RISK ASSESSMENT

Job Number
9023

Date
6/91

Plate
2

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

August 14, 1991

Leonard Overholser
Pacific Trust Company
1245 South Winchester Blvd.
San Jose CA 95128

RE: 21450 Mission Blvd., Hayward CA 94541

Dear Mr. Overholser:

I have reviewed the Supplemental Investigation report prepared June 14, 1991 by Eirra Consultants. The reports presents the results of chemical analysis and boring log data from investigation work carried out on May 10, 1991 at the above referenced site.

I stated in my correspondence to you dated March 14, 1991, that further investigation of the depth of soil contamination beneath the former kerosene tanks was needed before the case could be referred to the RWQCB for closure. I specified that soil sampling results showing a drop of contaminants to nondetectable levels within a few feet of the base of the former tank pit could present a convincing argument for case closure. Subsequently, Eirra Consultants submitted a workplan acceptable to this office and then sampled soil beneath the former tank via a 30 foot soil boring. Chemical analyses were done of soil taken from depths of 6, 12, 16, 21, and 27 feet. Petroleum hydrocarbon contamination was present in all of these samples, with concentrations ranging from 40 to 170 ppm Total Extractable Petroleum Hydrocarbons. These results do not indicate that contaminant levels drop significantly with depth beneath the former tank.

After reviewing the Supplemental Investigation report, I discussed site conditions with Richard Hiett of the RWQCB. Generally speaking, the San Francisco Bay Regional Board may allow closure in cases such as yours without installation and monitoring of wells when either or both conditions listed below exist:

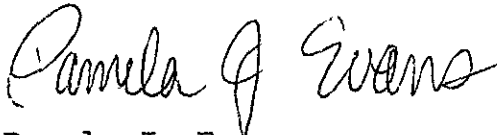
1. A continuous aquitard (soil layer impermeable to groundwater) of at least five foot thickness has been shown through boring log data to exist between the deepest known soil contamination and first groundwater.
2. Deepest known soil contamination and first groundwater are separated by a distance 20 feet.

Leonard Overholser
Pacific Trust
August 14, 1991
Page 2 of 2

Boring log data from your site does not document the presence of a five foot thick aquitard between soil contamination and groundwater, whether it occurs at 30 or 60 feet. In fact, log data indicates that soils on your site are permeable. Also, assuming that the zone of near-saturation found to occur at about 30 feet at your site is not, even in non-drought conditions, actually a perched aquifer, and that the groundwater level at the site is, in fact, at about 60 feet, it has not been demonstrated that a 20 foot separation exists between last known contamination (currently 73 ppm at 27') and groundwater.

Under these circumstances, it is not possible for me to recommend closure of this site to the Regional Board. You may contact me with any questions at (415)271-4320.

Sincerely,

A handwritten signature in cursive script that reads "Pamela J. Evans".

Pamela J. Evans
Hazardous Materials Specialist

c: Richard Hiett, RWQCB
Chris French, Eirra Consultants

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

May 6, 1991

Leonard Overholser
Pacific Trust Company
1245 South Winchester Blvd.
San Jose CA 95128

RE: 21450 Mission Blvd., Hayward CA 94541

Dear Mr. Overholser:

I have reviewed the work plan prepared by Christopher French of Eirra Consultants for the above referenced property. The proposal, to advance a 30 foot boring beneath the former kerosene tank location and take six soil samples at five foot intervals, is acceptable to this office.

Please notify me prior to sampling so that I may be present. Copies of the analysis results and sampling report must be submitted to this office and to the Regional Water Quality Control Board. The Board has recently moved its office. The new address is: 2101 Webster St., 4th Floor, Oakland CA 94612

You may contact me at (415)271-4320 with any questions.

Sincerely,

Pamela J. Evans
Hazardous Materials Specialist

c: Richard Hiett, RWQCB
Christopher French, Eirra Consultants



91 APR -3 AM 11: 13

March 27, 1991

Pamela J. Evans
Department of Environmental Health
Hazardous Materials Program
80 Swan Way, Room 200
Oakland, CA 94621

Re: 21450 Mission Blvd., Hayward, CA


Dear Ms. Evans:

Enclosed are our checks for \$250.00 each for continued oversight of investigation and remediation activities at 21450 Mission Boulevard in Hayward.

Also I am returning a Contamination Site Report which I believe was misdirected to me.

We will be submitting the appropriate work plan as you requested in your letter of March 14, 1991.

Sincerely yours,


Leonard R. Overholser
Vice President/Manager

LRO/bo

Encls.

cc: Chris French

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

March 14, 1991

Leonard Overholser
Pacific Trust Company
1245 South Winchester Blvd
San Jose CA 95128

RE: 21450 Mission Blvd., Hayward

Dear Mr. Overholser:

In early January I instructed you to submit a work plan by February 15, 1991 for investigation of fuel contamination at the above referenced property. Before February 15, we discussed referring this case to the San Francisco Regional Water Quality Control Board. At Chris French's request, I retained the case pending his submittal of a response to the requirement. I have reviewed the correspondence package from yourself and Christopher French dated March 6, 1991 and discussed the site history, once again, with Richard Hiett and Lester Feldman of the RWQCB.

I would like to briefly discuss the issues relating to the site and to restate the requirements of this office in order to move toward closure:

RWQCB guidelines ("Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites" dated 8/10/90) specify that in cases in which groundwater is deeper than 50 feet and in which a groundwater/soil investigation has been required, the extent of soil contamination must be determined, and in some cases, a groundwater monitoring well will be required.

Because contamination in the soil exceeded 100 ppm (a case prioritization level used by RWQCB and this agency), I required that the full lateral and vertical extent of the contamination be determined before I could recommend case closure to the RWQCB. I have stated in previous conversations and correspondence (1/8/91) that should further investigation of the soil beneath the former kerosene tank show contamination to be localized, no groundwater monitoring well would be required at this time. Let me be more specific: Previous sampling has provided evidence that the lateral extent of contamination does not exceed the area of the tank pit. What is still needed is full investigation of the vertical extent of the contamination beneath the former tank. By presenting sampling results that show a drop of contaminants to nondetectable levels within a few feet of the tank pit base, your consultant could present a convincing argument for case closure.

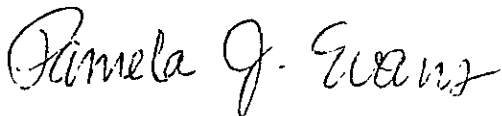
Leonard Overholser
Pacific Trust
RE: 21450 Mission Blvd., Hayward
March 14, 1991
Page 2 of 2

Your consultant, Chris French, has informally proposed boring to thirty feet beneath the former kerosene tank and obtaining soil samples from this boring for analysis. I told Mr. French that, if this meets with your approval, the work plan should be submitted in writing to this office before being carried out. The plan must include, at a minimum, a site diagram showing the proposed location of the boring as well as a statement of its proposed total depth, the number of samples to be taken, and their depths.

I will expect your work plan for further investigation by no later than April 15, 1991. If I have not heard from you by that date, this matter will be referred to the Regional Water Quality Control Board.

The deposit submitted to this office for oversight of investigation and remediation activities has been exhausted. Please submit an additional deposit of \$500.00, to cover past and future costs pertaining to this case. Enclosed you will find this agency's cost accounting sheet for time spent on this case. You may contact me with any questions at (415)271-4320.

Sincerely,



Pamela J. Evans
Hazardous Materials Specialist

c: Ed Howell, Chief, Hazardous Materials Division, ACHCSA
Richard Hiett, RWQCB
Christopher M. French, REG

Christopher M. French, R.G.

R.G. #4465
R.E.A. #00307

ENVIRONMENTAL INVESTIGATION, REMEDIATION, AND RISK ASSESSMENT
2735 ELMWOOD AVENUE
BERKELEY CALIFORNIA 94705
(415) 486-0722

91 FEB 14 PM 1:01

February 12, 1991

Ms. Pamela Evans
ACHCSA
80 Swan Way, Room 200
Oakland, CA 94621

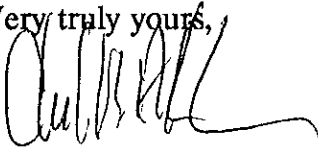
Subject: Submittal Delay, 21450 Mission Blvd., Alameda County (unincorporated), CA

Dear Ms. Evans:

Due to an unanticipated personal matter, I will be unable to meet the requested deadline of 15 February 1991 for submittal of a response to your letter dated January 8, 1991. A draft response has been prepared and will be finalized by March 1.

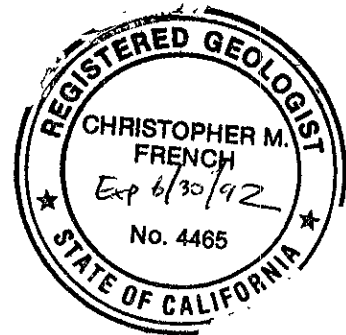
Thank you for your understanding in this matter. Should you have any questions regarding the delay, please call me at 833-8464.

Very truly yours,



Christopher M. French, R.G., R.E.A.
Registered Geologist No. 4465 (Exp. 6/30/92)

cc: Mr. Len Overholser, Pacific Trust Company
Mr. Lester Feldman, RWQCB



Christopher M. French, R.G.

R G #4465
R E A #00307

ENVIRONMENTAL INVESTIGATION, REMEDIATION, AND RISK ASSESSMENT
2735 ELMWOOD AVENUE
BERKELEY, CALIFORNIA 94705
(415) 486-0722

91 FEB 13 AM 10:54

February 11, 1991

Mr. Ed Howell
ACHCSA
80 Swan Way, Room 200
Oakland, CA 94621

Subject: Conversation of February 4, 1991, Regarding 21450 Mission Blvd., Alameda County (unincorporated), CA

Dear Mr. Howell:

Thank you for taking the time from your busy schedule to discuss the status of the LUFT investigation at the above referenced property. It is my understanding that Ms. Pamela Evans and Mr. Ariu Levy were present in your office during our conversation. The subject matter of our discussion has been recorded in writing and submitted to Pacific Trust. I would like to take this opportunity to provide you with some written documentation which has a bearing on the discussion.

1. I have attempted to convey to you that the source area and strength are of extremely low significance regardless of hydrogeologic setting, and become negligibly small when compared to the known depth to groundwater in the area. The tank in question is extremely small - of eighty (80) gallon capacity - and still contained product after a period of thirty (30) years. The source area measures 4.5 feet by 4.5 feet, and is not likely to be more than a few feet thick. In contrast, groundwater has been measured at 61 feet. No organoleptic (visual or odorous) trace of contamination, nor any response by field instrumentation, was apparent at the limits of excavation.

2. I have attempted to relate to you my extreme misgivings regarding Ms. Evans' conclusion that remediation has been ineffective. You have indicated that you have reviewed Pamela's interpretation and concur that no difference can be ascertained in the concentrations obtained during minimum verification analysis (MVA), and concentrations obtained subsequently during overexcavation. While it is true to say that there is no difference between these two numbers referred to by you and Ms. Evans, it is incorrect to draw any technical conclusions from the comparison. The two numbers are, after all, only part of a larger data set of certified analytical results collected during remedial activities. All data which have a direct bearing on technical evaluation of the efficacy of remedial action must be considered. When taking all points of the data set into consideration, it is very clear that soil remaining in place has a concentration at least six fold less than that which has been removed. This six-fold decrease has been accomplished within three feet of the tank bottom. To illustrate this point, I have enclosed a copy of the original gas chromatogram for two of the soil sampling results.

Mr. Ed Howell
ACHCSA
February 11, 1991
Page 2

The very strong chromatographic response is derived from soil which has been removed from the source. The very low response is derived from soil remaining in place at the base of the excavation. As you can see, the comparison in peak areas for soil removed from the source area to that residual amount remaining in place clearly shows a very dramatic decrease in contaminant concentrations.

Pertaining to Ms. Evans' continuing misinterpretation of the data laid before her, I can only convey to you my very extreme disappointment and disbelief that you should permit such shameful misrepresentation of data by an employee under your purview. I do not mean to be disrespectful, but there is no room for such behavior where the expenditure of large and unnecessary capital is at stake. I would also like to remind you that, where the activities of an agency are considered arbitrary, capricious and lacking in evidentiary support, the Porter-Cologne Act provides for civil remedy.

3. You have indicated that by application of RWQCB guidelines, any case containing TPHD concentrations over 100 ppm requires a groundwater investigation.

I have replied, with all due respect to your supervisory capacity, that you should please reacquaint yourself with the guidelines. This particular case falls under category III.2 of the RWQCB guidelines contained within "Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks" (revised 18 May 1989). This guideline states:

"In cases where a soil/groundwater investigation has been required and the depth to the seasonal high ground water is greater than 50 feet, the responsible party must complete the following work:

III.2.a. Determine the extent of the soil contamination.

Field meters are acceptable screening tools, but laboratory analysis of soil samples are required for verification of the extent of soil contamination.

III.2.b. Install monitoring well(s) per Regional Board guidance.

The Regional Board will assess the necessity of monitoring wells on a site specific basis."

It is clear that, in drafting the guidelines, the Board has recognized that in some cases,

Mr. Ed Howell
ACHCSA
February 11, 1991
Page 3

an actual threat to groundwater may not exist. As stated in the guidelines:

"The intent of these divisions" (in assessing the type of soil/groundwater investigation to be performed) "is to insure the protection of the shallow groundwater zones while allowing flexibility in situations where the groundwater zone is deep and less likely to be impacted by leaks from underground storage tanks" ... "deep' ground water has a minimum 35 - 40 foot buffer zone from the tank bottom to the ground water. Regional Board staff believe that this zone may, in specific instances, adequately prevent pollution migration into the ground water. Therefore, in cases where the depth to ground water is greater than 50 feet, a site specific approach is warranted."

With reference to the work performed at the site, it is noted that a soil/groundwater investigation has already been performed. The vertical extent of contamination has been evaluated in accordance with section III. 2. a. of the RWQCB guidelines. Two separate borings, the first utilizing continuous sampling and both utilizing field screening with a photoionization detector, have been drilled within ten feet of the former source. The contamination extends to no more than a depth of 6.5 feet, approximately 10 percent of the total depth to groundwater. This allows for a "buffer" of 55 feet. Soil samples collected at 50 % of the distance to groundwater also contain no detectable contamination. This still allows for a "buffer" of over thirty feet. Large intervals of this subsurface "buffer" contain a significant fine grained fraction, which causes substantial water retention and inhibits vertical contaminant migration. Lastly, a five foot thick clay layer separates the groundwater from overlying units.

As I indicated to you in our telephone conversation, these criteria are technical guidelines, and are legally enforceable only within the limitations proscribed within the Porter Cologne Water Quality Control Act. The section of the Act from which the LIA and the RWQCB derive their authority to require monitoring and investigation states:

§13267 (a): "A regional board,"..."in connection with any action relating to any plan or requirement or authorized by this division, may investigate the quality of any waters of the state within its region."

Limitations are proscribed in the next section:

§13267 (b): "In conducting an investigation specified in subdivision (a), the regional board may require that any person" ... "shall furnish, under penalty

Mr. Ed Howell
ACHCSA
February 11, 1991
Page 4

of perjury, those technical or monitoring program reports as the board may specify. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports."

You have also been reminded of State LUFT requirements pertaining to the level of TPHD concentrations which require remediation. You have been informed that, by application of State LUFT criteria contained within Table 2-1 of the LUFT manual (State of California, Leaking Underground Fuel Tank Task Force, revised May 5, 1990), the maximum allowable concentration remaining in site soil is 1,000 ppm. This level is one order of magnitude (X10) greater than the amount remaining in place.

4. You have stated that the RWQCB has been providing close oversight on this case and had concurred with the opinions of the ACHCSA. I would like to take this opportunity to recount a previous discussion I had with Ms. Evans, while Mr. Ariu Levi was present. Ms. Evans had Mr. Levi present, I presume, because of his familiarity with the case. Ms. Evans had noted that her superiors were closely following the case, but when I asked Mr. Ariu Levi to recount his understanding of site conditions, he replied that he was unfamiliar with the case and could not provide any commentary. When I requested that Ms. Evans review for Mr. Levi's benefit, in Mr. Levi's presence, the tabulation of analytical results which demonstrated the efficacy of remedial action and the definition of vertical extent of contamination, the review was not forthcoming.

This experience is but one of the many reasons why I have a nagging doubt as to whether this case has received a judicious and impartial review by a technically competent individual. Pacific Trust, previously, had therefore respectfully requested, for the benefit of due diligence with regard to the trust which Pacific Trust is mandated to protect, that the RWQCB provide written concurrence with the ACHCSA's opinion that further work be performed. It is my understanding that Pacific Trust is willing to undertake further work at the site following receipt of such a signed letter of concurrence. Such written concurrence has not been forthcoming. It is, in my opinion, extremely unlikely that a competent, unbiased person with a basic understanding of hydrogeologic principles and contaminant transport behavior could even remotely construe that a realistic hazard exists from a source which 1) is derived from a two foot diameter tank containing residual product after a period of thirty years, causing contamination measuring in area less than 4.5 feet on a side, 2) has been defined both vertically and horizontally, 3) appears to have not migrated over a period of 30 years, in which time the propensity to migrate would surely have been brought into equilibrium with the retentive capacity of site soils, 4) has been excavated to the limits of field

Mr. Ed Howell
ACHCSA
February 11, 1991
Page 5

instrument and organoleptic detection and 5) is at a residual strength one tenth of the magnitude proscribed in the State LUFT guidance.

5. You have also been informed that, in eight years of direct, uninterrupted experience in contaminant hydrogeology, I have directly observed and investigated uncountable cases of gross environmental negligence and, by virtue of having grown up with the environmental movement, am supportive of the State's implementation of environmental regulation. Speaking as a trained, certified professional and having thoroughly investigated this property, I am not attempting to "pull the wool over the County's eyes", to exercise the vernacular, by stating that it is my true and honest opinion and belief, substantiated fully by all available evidence, that no threat to groundwater could possibly exist at this site as a result of the negligible release from this insignificant tank. I have also explained to you that where and when a problem or potential problem is perceived to exist, I am the first to communicate this perception and outline a course of required action to the client. It is also noted that performance of further work at this site will clearly enure most to my financial benefit.

6. You have stated that California is in a drought situation and that therefore, perched groundwater zones may have in the past and in the future come to be located beneath the site. I have replied that the supposition is hypothetical and has no bearing on this case, as the site is located within an urban environment where pavement restricts infiltration and accentuates runoff, inhibiting downward propagation of a contaminant front. You have countered that groundwater could, in the future, come to be located at a shallower depth than fifty feet beneath the surface. This is true, and I apologize for not having correctly interpreted your concern. I have noted that the underground tank has been located within the subsurface for a period of thirty years without contamination having migrated more than a few feet from the base of the tank, based upon sampling and analysis from two boreholes, and it is deemed extremely unlikely that perched groundwater could ever rise into the affected area from the depth of the potential perching horizon.

Please allow that previous site work may be referenced to further address this point. It is noted that continuous sampling beneath the site has identified a very homogeneous sandy silt which extends from the ground surface to 31 feet. The sandy silt terminates at this depth and is underlain by a dense, clayey sand characterized by a very high moisture content. This second zone, prior to urban development and the construction of the concrete lined San Lorenzo Channel, may have constituted the first potential layer of perched groundwater, despite the poor thickness of the unit. Because of the recognized hydrogeologic significance of this layer and its observed high moisture content, the

Mr. Ed Howell
ACHCSA
February 11, 1991
Page 6

uppermost portion of this semisaturated zone has been sampled on two separate occasions, from two separate boreholes. The first borehole was located directly adjacent to the tank. The second borehole was located within 10 feet of the tank. Both samples collected from the uppermost portion of the zone were submitted to a DHS certified analytical laboratory (Anametrix, Inc.) and both samples contained nondetectable quantities of both low and medium boiling point hydrocarbons. These results have been submitted to the ACHCSA on two separate occasions. The ACHCSA has not acknowledged these results. Is this behavior defensible, Mr. Howell?

6. You advised that it was your understanding that Pacific Trust will not be submitting a work plan for further investigation of the site and that therefore, it would be best for Pacific Trust to take the matter up with the RWQCB, as the ACHCSA could not remove the site from the LUFT list without the Board's concurrence. I have indicated that a reply to Ms. Evans' request would be submitted. The reply will provide additional technical detail to illustrate that Ms. Evans' opinions are regrettably lacking in evidentiary support.

Pacific Trust has always conveyed to me a willingness to follow through with whatever is necessary to accomplish the intent and objectives set forth in the environmental regulations and guidelines. In my opinion, Pacific Trust has performed far above the normal standards for investigation, tank removal and remediation of this site. Every shred of technical documentation requested by Ms. Evans has been immediately forthcoming. When I compare Pacific Trust's willingness and dedication to proceed with cleanup and removal of this site with the actions of the water district located within this political jurisdiction, I can only wonder whether political favoritism and the concept of benign neglect for purposes which suit the expediency of the moment are endemic to this county. Can you, Mr. Howell, please explain to me why you are requiring a non problem from a ridiculously small source to be reinvestigated, when the water district - the agency which is responsible for protection of the underground water resources in this county - has, at a site operated by the district, discovered diesel to be present in groundwater at levels in excess of its solubility (implying floating product) but has fulfilled not one of the criteria for remediation and investigation contained within the guidelines, and yet curiously has the gall to have the site listed as "closed"? In my opinion, Pacific Trust is being asked to undertake obligations which have been previously and adequately performed, on the basis of an observation by the ACHCSA which is derived from clear misinterpretation and lacks any evidentiary support.

Eventually, it may dawn upon the public that they are being hoodwinked by agencies who aggressively promote a non obtainable standard for cleanup, at tremendous expense

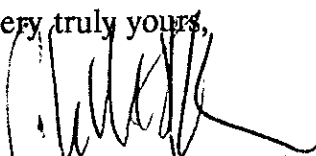
Mr. Ed Howell
ACHCSA
February 11, 1991
Page 7

of capital, even if the tax base erodes and the citizens and business community suffer. It is clear, during this most recent election, that the wave of environmental concern ran into and was engulfed by a counterwave of economic panic. You should probably take a cue from this. Absolute safety is the complete absence of harm. We can never achieve this. We can only offer a probability that there will, in fact, be no harm. With reference to the site at 21450 Mission, it is clear that there is a very, very, low probability for harm. I am hopeful that the response to Ms. Evans which will be forthcoming this week will adequately convey this absence of risk to the ACHCSA. At that time, it is respectfully recommended that you correct any continuing misinterpretations which may possibly continue to prevail in Ms. Evans mind. I wish to remind you that Pacific Trust has already undertaken financial obligations amounting to thirty percent of the value of the property. Rest assured, Mr. Howell, that the Pacific Trust Company, their attorneys and their trade organizations are prepared to undertake all available remedies allowed by law, including administrative, civil and political, to ensure that this case and factors related to the ACHCSA's evaluation of this case are reviewed, addressed and corrected.

In closing, please understand that I do not mean to be disrespectful to you, Ms. Evans, the ACHCSA or the RWQCB. It would have been considerably easier for me to have taken Ms. Evans' letter in hand, turned to my client, and recommended that we proceed with further action at this site, thereby ensuring a handsome profit and the absence of any wrath from your agency. But this is a matter of principle. I wish to thank you once again for your review of the case. I hope that your review has been very thorough, such that you will be in a position to defend your opinions and conclusions. I also anticipate that you will please reacquaint yourself with the content of the regulations and guidelines. A copy of our response to Ms. Evans' request will be forwarded to you.

Should you have any further questions regarding this case, please call me at 833-8464.

Very truly yours,



Christopher M. French, R.G., R.E.A.
Registered Geologist No. 4465 (Exp. 6/30/92)
Registered Environmental Assessor No. 307

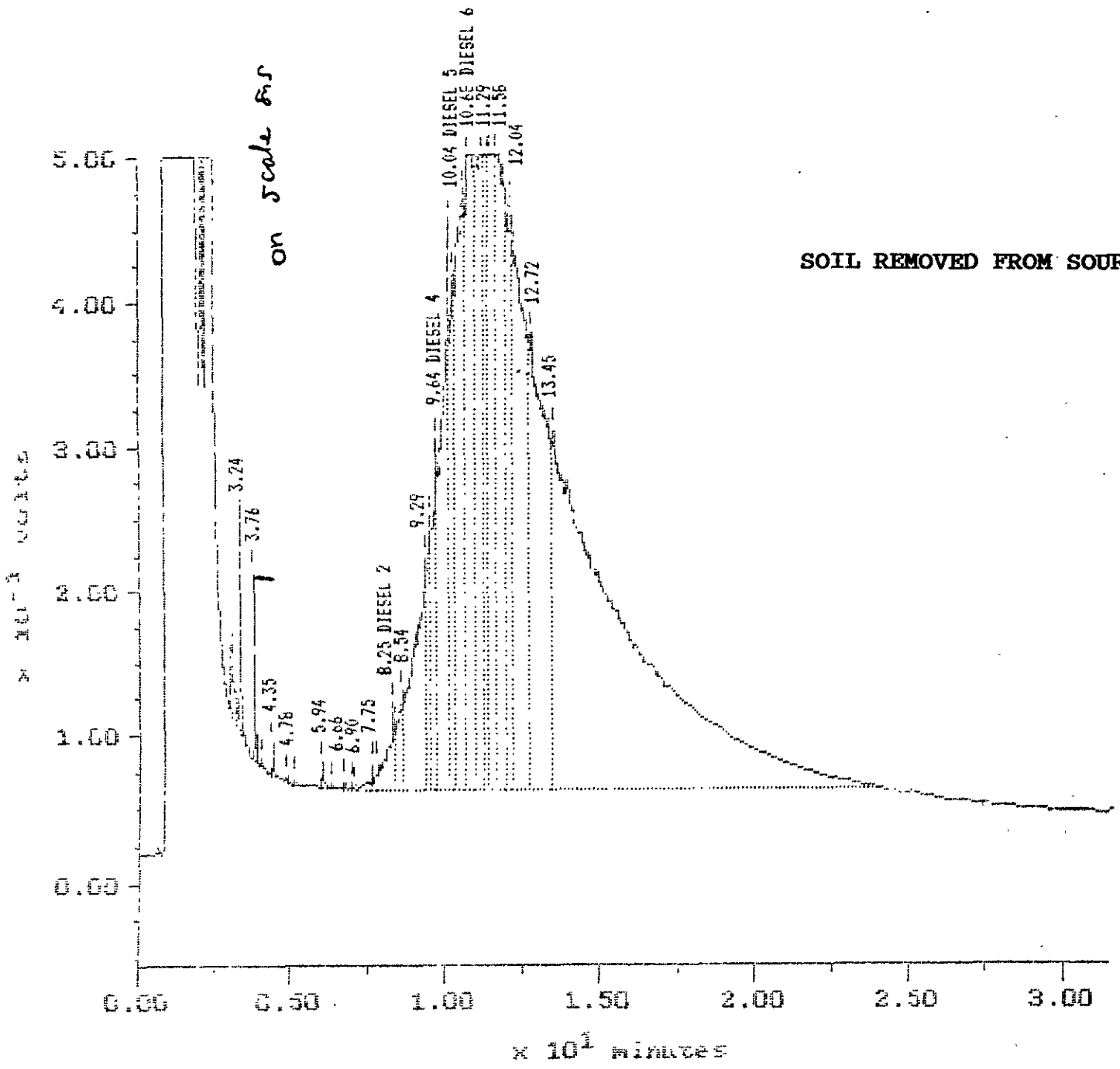
cc: File

enclosure

SPD-2

Sample: 5009157-24 Channel: FID 19
 Acquired: 25-SEP-95 12:33 Method: C:\MSDCHEM\MSDCHEM\MSDCHEM.D
 Dilution: 1 : 1.00 Inj Vol: 2.00
 Comments: Colson: 30 K DE-1 HP9

Filename: 09157-24
 Operator: JY

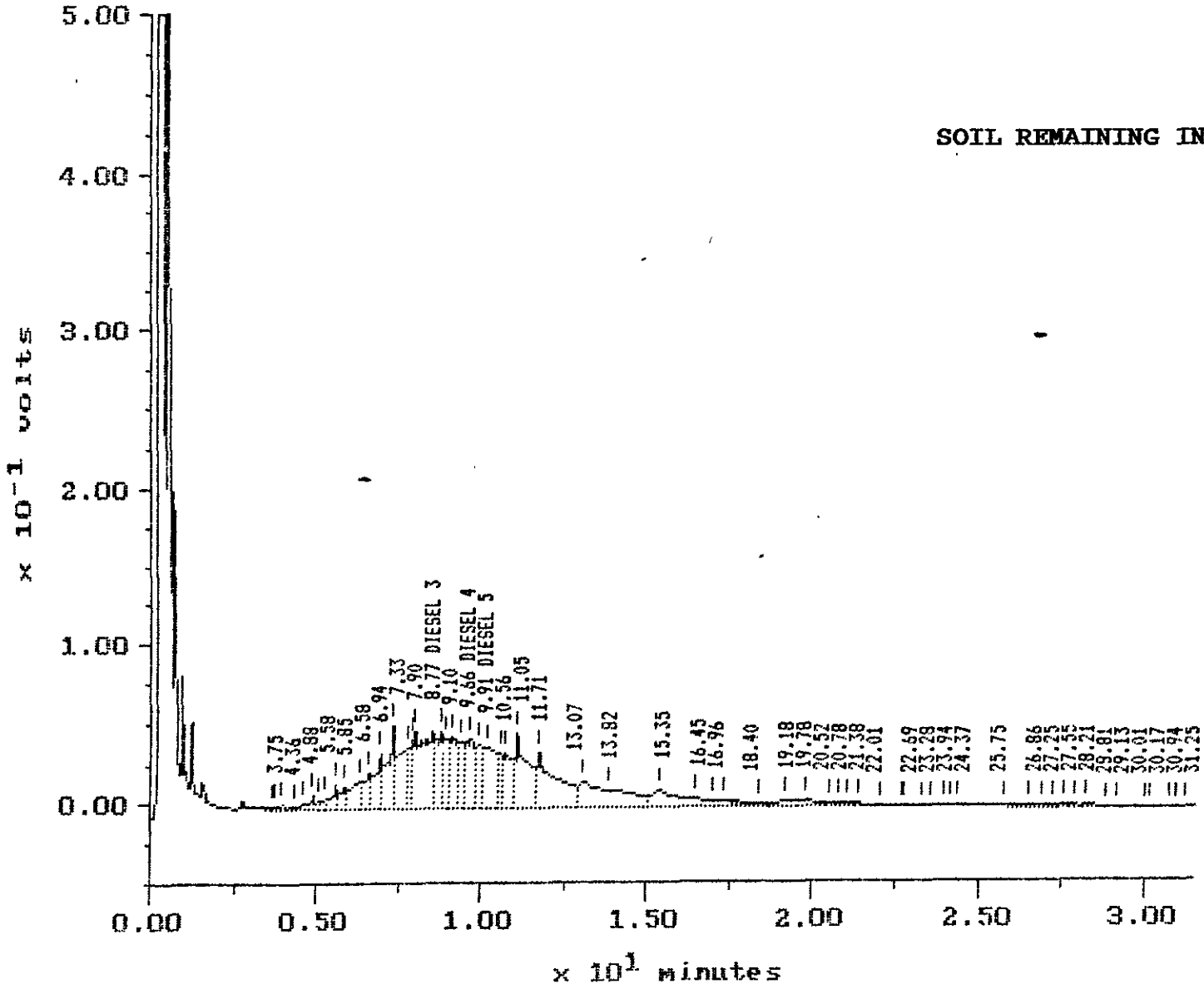


SOIL REMOVED FROM SOURCE

Filename: 07206-04
Operator: IY

KER-6-2

Sample: 9007206-04 Channel: FID 9
Acquired: 09-AUG-90 1:13 Method: C:\MAX\DATA\F135109
Dilution: 1 : 1.000 Inj Vol: 2.00
Comments: Column: 30 M DB-1 HP9



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

January 8, 1991

Leonard Overholser
Pacific Trust Company
1245 South Winchester Blvd
San Jose CA 95128

RE: 21450 Mission Blvd., Hayward

Dear Mr. Overholser:

I have reviewed the correspondence package from yourself and Christopher French dated December 18, 1990. Included in Mr. French's letter were point by point responses to each issue I raised in my November 18 correspondence. Of these four issues, he has so far satisfactorily addressed three; I have received copies of hazardous waste manifests and an Unauthorized Leak Report, and Mr. French has provided a convincing case that the xylene contaminated backfill soil is unlikely to impact groundwater beneath the site.

The remaining issue of concern is the contamination that exists in the former kerosene tank pit. The remediation and follow up sampling done so far has indicated that petroleum concentrations have not dropped significantly in the base of the pit. While sidewall samples showed little or no contamination, the two basal samples showed no significant drop in concentration when compared to the original basal sample. (Original basal sample contained 130 ppm TPH, two follow up samples contained 87 and 150 ppm TPH). It could be argued, and accepted by this office, that the contamination has been laterally defined. However, its depth has not been sufficiently investigated or remediated. In order for your case to be referred to the Regional Water Quality Control Board for closure review, the extent of this soil contamination must be fully investigated. At this point it is not possible to conclude that no threat to groundwater exists.

Both you and Mr. French expressed concerns that the requirements I have set forth for further investigation and remediation at your site have been excessive. You stated in your letter that you would require written concurrence from my program director as well as from RWQCB prior to your approving any further work at the site. In preparing this and all past responses to proposals by contractors working with your site, I have been in constant consultation both with my superiors and with representatives of RWQCB, including Lester Feldman and Richard Hiatt. In fact, both Mr. Feldman and Mr. Hiatt, upon being briefed on your site conditions, stated that groundwater monitoring wells should be installed. After we discussed your case further, Mr. Hiatt concurred with me that an alternative course might be pursued: Should further investigation yield convincing evidence

Leonard Overholser
Pacific Trust
RE: 21450 Mission Blvd., Hayward
January 8, 1991
Page 2 of 2

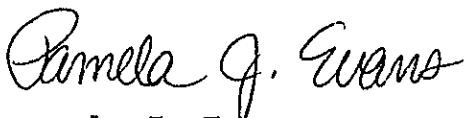
that the contamination under the kerosene tank is localized, then no monitoring wells would be required at this time. Mr. Hiett also advised that if you are unwilling to act on this agency's requirements, the case could be referred to RWQCB for enforcement action.

While the question of case closure will ultimately be decided by the Regional Water Quality Control Board, this office acts as lead agency in overseeing investigation and remediation of contaminated underground tank sites. This agency's responsibility in such cases is established by formal written agreement with RWQCB.

I will expect your workplan for further investigation and remediation no later than February 15, 1991. If I have not heard from you by that date, this matter will be referred either to the Regional Board or to the Alameda County District Attorney's Office.

Enclosed you will find, as requested, this agency's cost accounting sheet for time spent on this case. You may contact me with any questions at (415)271-4320.

Sincerely,



Pamela J. Evans
Hazardous Materials Specialist

Enclosure

Conv. w/ Chris French 1/17/91 - wants the matter referred to RWQCB - does not want to do further work at this site.

c: Rafat Shahid, Assistant Agency Director, ACHCSA
Ed Howell, Chief, Hazardous Materials Division, ACHCSA
Gil Jensen, Alameda County District Attorney's Office
Richard Hiett, RWQCB
Howard Hatayama, DOHS
Christopher M. French, REG



December 18, 1990

Ms. Pamela Evans
ACHCSA
80 Swan Way, Room 200
Oakland, CA 94621

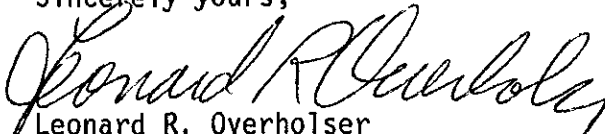
Re: King Trusts

Dear Ms. Evans:

In accordance with directions from you and Christopher M. French (copy of letter attached) enclosed are copies of 2 manifests from Erickson Inc. and Solvent Services together with a completed Unauthorized Release Report form.

Other information which you requested is being forwarded under separate cover.

Sincerely yours,


Leonard R. Overholser
Vice President/Manager

LRO/bo

Encls.

90 DEC 20 AM 10:59

Picture print of label. (Forms designed for use on site (i.e. vehicle) are preferred.)

240-80-044, COLUMBIA

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. **0230002875VD**

2. Manifest Document No. **0230002875VD**

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Facility Name and Site Address: **GREEN HAULER**

4. US EPA ID Number: **0230002875VD**

5. Transporter's Company Name: **EXCELTRANS, INC.**

6. US EPA ID Number: **0230002875VD**

7. Receiver's Facility Name and Site Address: **GREEN HAULER**

8. US EPA ID Number: **0230002875VD**

9. Material Description (including Proper Shipping Name, Hazard Class, and ID Number): **WASTE EMPTY STORAGE TANKS**

10. Quantity (in drums, tanks, or other containers): **NON-HERRINGBONE WASTE TANKS**

11. Manifest Status: **USHA P**

12. Facility Name: **GREEN HAULER**

13. Facility Address: **GREEN HAULER**

14. Generator's Certification: I hereby certify that the contents of this assignment are true and accurately described above to proper effect, and are otherwise, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

15. Transporter's Acknowledgment of Receipt of Materials: **JOE BATES**

16. Receiver's Acknowledgment of Receipt of Materials: **HARRISON L. STOKES**

17. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 13.

EPA 600/4-82 (Rev. 9-82) Previous editions are obsolete.

Do Not Write Below This Line

GREEN HAULER RETAINS

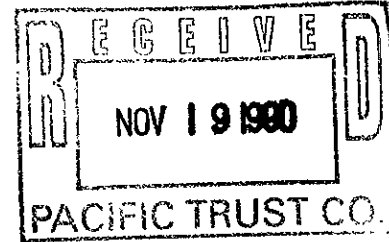
Christopher M. French, R.G.

RG #4465
REA #00307

ENVIRONMENTAL INVESTIGATION, REMEDIATION, AND RISK ASSESSMENT
2735 ELMWOOD AVENUE
BERKELEY, CALIFORNIA 94705
(415) 486-0722

November 14, 1990

Mr. Len Overholser
Pacific Trust Company
1245 South Winchester Blvd.
San Jose, CA 95128



Subject: Transmittal of Unauthorized Release Report and Hazardous Waste Manifest, Hayward Motors, Alameda County, CA

Dear Mr. Overholser:

Ms. Pam Evans of the Alameda County Health Care Services Agency (ACHCSA) has requested submittal of an "Unauthorized Release Report Form", and copies of the separate hazardous waste manifests signed by Erickson, Inc. and Solvent Services, respectively, in order that she may proceed with submittal of a recommendation for case closure to the Regional Water Quality Control Board.

As we discussed, the copies of the two manifests submitted with the original report do not contain the signature of the facility (Line 20). A completed Unauthorized Release Report Form and a facsimile reproduction of the manifest signed by Erickson are enclosed. It is my understanding that you have contacted Solvent Services for a copy of their signed manifest. Once the second manifest has been received by you from Solvent Services, please submit all three items to Ms. Pamela Evans, ACHCSA, 80 Swan Way - Rm. 200, Oakland, CA 94621.

An unmarked copy of the report form is enclosed in the event that you would like to have the form typed, rather than completed by hand. Should you have any questions, please call.

Very truly yours,

A handwritten signature in black ink, appearing to read "Chris French".

Christopher M. French, R.G.
Registered Geologist No. 4465 (Exp. 6/30/92)

Enclosure (3)

83742697
 IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. CAC00002896174210917		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
		3. Generator's Name and Mailing Address PACIFIC TRUST 21450 MISSION BLVD HAYWARD CA. 94505		A. State Manifest Document Number 89742697		B. State Generator's ID EXEMPT	
4. Generator's Phone () (415) 623-0480		5. Transporter 1 Company Name SOLVENT SERVICES		6. US EPA ID Number CA00059494310		C. State Transporter's ID 002870	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (408) 453-6046		E. State Transporter's ID	
9. Designated Facility Name and Site Address SOLVENT SERVICES 1021 BERRYESSA RD SAN JOSE CA. 95133		10. US EPA ID Number CA00059494310		G. State Facility's ID CA00059494310		H. Facility's Phone (408) 453-6046	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) WASTE FLAMMABLE LIQUID NOS FLAMMABLE LIQUID UN 193 ERG-27				12. Containers No. Type		13. Total Quantity	
				14. Unit Wt/Vol		15. Waste No. State EPA/Other 214/343 0001/0008	
J. Additional Descriptions for Materials Listed Above WEAR GLOVES & GLASSES 24 HR PA (415) SAME FL-2188/CONTAINS: LEAD				K. Handling Codes for Wastes Listed Above a. 99 b. c. d.			
16. Special Handling Instructions and Additional Information				A) 99/01/02			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name K.M. Krause		Signature <i>K.M. Krause</i>		Month Day Year 08/15/90		17. Transporter 1 Acknowledgement of Receipt of Materials	
Printed/Typed Name CARL PEREZ		Signature <i>Carl Perez</i>		Month Day Year 08/15/90		18. Transporter 2 Acknowledgement of Receipt of Materials	
Printed/Typed Name		Signature		Month Day Year		19. Discrepancy Indication Space	
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.							
Printed/Typed Name TAMI TOOMIRE		Signature <i>Tami Toomire</i>		Month Day Year 10/8/15/90		FACILITY	

90 DEC 31 AM 11:36

December 18, 1990

Ms. Pamela J. Evans
Hazardous Materials Specialist
Alameda County Health Care Services Agency
80 Swan Way
Oakland, CA 94621

Re: Response to ACHCSA Letter of November 14, 1990
21450 Mission Blvd., Hayward 94541

Dear Ms. Evans:

We have had occasion to review your letter of November 14, 1990 in detail. Due to the technical nature of subject matter, I have requested that our consultant, Mr. Chris French, R.G., provide appropriate commentary regarding your additional requirements for closure. His detailed response is enclosed.

It had been my impression from speaking with Mr. French that completion of the matters provided in Items 2 and 3 of your letter was all that would be required prior to your initiation of a recommendation for case closure. This impression had first been conveyed by you to Mr. French in a phone conversation on the morning of November 8, 1990. Both Mr. French and I were, therefore, quite taken aback by the content of your letter. From my review of Mr. French's response, it is apparent that he strongly disagrees with your findings.

As an administrator in a trust institution, my actions are subject to strict audit and review by federal regulatory entities, including State Banking Department, Federal Reserve, etc. To date, the expenditures that Pacific Trust Company has incurred to bring the subject property into compliance with the underground storage tank regulations has seriously impacted on the value of the trust. The expenditures have not escaped the attention of those agencies providing examination. For purposes of accountability, I therefore ask that you review the contents of Mr. French's letter carefully. I will also be happy to meet with you at a mutually convenient time to review the elements of this case should those questions remain unresolved.

Please be advised that I will require the written concurrence of the Director of the ACHCSA Hazardous Materials Program and either Mr. Tom Callaghan or Mr. Don Dalke of the Regional Water Quality Control Board prior to approval of any additional work at this site. The letters should provide a statement

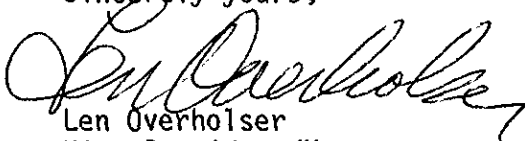
Ms. Pamela J. Evans
December 18, 1990
Page Two

indicating that the accountable supervisors of both agencies have reviewed the closure report and the subsequent response to comments, and that in their opinion, the burden of additional reporting, including cost, bears a reasonable relationship to the need for the reporting and the benefits to be obtained from the reporting. These letters are required to satisfy the fiduciary responsibility of Pacific Trust Company as trustee, and to provide for future regulatory accountability. It is further requested that the original, signed copy of the two letters of concurrence be submitted. A copy stating "Original Signed by" will not suffice.

Pertaining to Items 2 and 3 of your letter, please be advised that these items are enclosed with Mr. French's letter. A check in the amount of \$300 is also enclosed, pursuant to your request. Please submit an accounting which details the number of hours spent on this project and the hourly charges incurred.

Thank you for your attention in these matters.

Sincerely yours,


Len Overholser
Vice President/Manager

Christopher M. French, R.G.

RG #4465
REA #00307

633-

ENVIRONMENTAL INVESTIGATION, REMEDIATION AND RISK ASSESSMENT
2735 ELMWOOD AVENUE
BERKELEY CALIFORNIA 94705
(415) 486-0722

December 18, 1990

Mr. Len Overholser
Pacific Trust Company
1245 South Winchester Blvd.
San Jose, CA 95128

Subject: Response to ACHCSA Comments Regarding UST Closure Report,
Hayward Motors, 21450 Mission Blvd., Alameda County, CA

Dear Mr. Overholser:

I have reviewed the letter submitted by Ms. Pamela Evans of the Alameda County Health Care Services Agency (ACHCSA), dated 14 November 1990, pertaining to review of the closure report dated 2 October 1990 ("Closure Report") and further requirements for investigation of the above referenced site. It is my opinion that the most significant concerns voiced by the ACHCSA have been adequately addressed in the above referenced report. The following detailed response addresses any remaining concerns the County may have. It is my professional opinion, based upon data provided herein and in previous reports submitted to the ACHCSA, that the burden, including costs, of requirements for additional reporting bears no reasonable relationship to the need for the reporting and the benefits to be derived from the reporting (Porter - Cologne Water Quality Control Act, Section 13267 (b)).

COMMENT #1. "In the first round of tank pit sampling that occurred in conjunction with the June 28 tank removal, significant levels of contamination were found in soil beneath the 80 gallon kerosine tank. Soil was "overexcavated" from the pit, and the walls and base were retested. The second round of sample results has not shown a significant drop in concentration of fuel constituents in the pit. At this point, you are required to either further investigate the depth and lateral spread of the contamination in the pit, or proceed directly to groundwater monitoring to ensure that no impact has occurred.

Response

The following comments illustrate that 1) the release is not significant, 2) the overexcavation did result in an 84% reduction in contaminant concentrations, 3) the vertical and lateral extent of contamination has been defined and 4) requirements for further investigative activities are not in accordance with the tenets of the Porter Cologne Water Quality Control Act.

Mr. Len Overholser
Pacific Trust Company
December 18, 1990
Page 2

The Release is not Significant

The opinion that "significant levels of contamination were found in soil beneath the 80 gallon kerosine tank" is not in accordance with guidelines established by the RWQCB. The initial concentration detected during minimum verification analysis of tank closure amounted to 130 ppm. The RWQCB has established a level of 100 ppm TPH concentrations in soil as a general decision value for "prioritizing" (sic) cases where shallow (<50 feet) groundwater conditions exist. Groundwater at this site is located at a depth of greater than fifty feet, and is separated from overlying units by a confining clay of greater than five foot thickness.

It is questionable, from these criteria alone, whether "significant" levels of contamination are present or could be present. The significance of the release is further thrown into doubt by consideration of the fact that 1) the eighty (80) gallon tank has contained a limited, finite quantity of fuel and by this criteria alone does not constitute a significant source, 2) the 80 gallon tank contained residual liquid (25 gallons) after a period of over 30 years, indicating that the amount of leakage was limited, 3) samples collected from depths of 6.5 feet and 30.5 feet in an exploratory boring (B1) set directly adjacent to the tank contained nondetectable concentrations of any petroleum hydrocarbons (Table 1 of the Closure Report), 4) samples collected from ten, fifteen and 30.5 feet in a second exploratory boring (B2), located ten feet away from the source, also contained nondetectable concentrations of hydrocarbons, and 5) calculations presented on pages 5 and 6 of the Closure Report provide the basis for an opinion that approximately 2.5 liters, or 0.6 gallons of hydrocarbon potentially remain in the source area.

On the basis of the discussion provided above, it has been conclusively shown that the concentration and extent of hydrocarbons do not constitute a significant source.

The Remediation Resulted in an 86% Reduction in Contaminant Concentrations

The statement made by the ACHCSA that "the second round of sample results has not shown a significant drop in concentration of fuel constituents in the pit" is misleading and has apparently been presented without review or understanding of the technical information and certified analytical reports presented in the Closure Report. The following quote is taken from page 5 of the closure report under the

Mr. Len Overholser
Pacific Trust Company
December 18, 1990
Page 3

heading titled "Effectiveness of Remedial Action:"

"Three soil samples have been collected from the stockpile of excavated soil. The average TPHD concentration of excavated soil is 360 milligrams per kilogram (mg/Kg), or parts per million (ppm). Five soil samples were collected from the sidewalls and base of the excavation. The average concentration of soil remaining in place is 52 ppm. This latter average has been calculated assuming a concentration of 5 ppm for those soil samples containing nondetectable (<10ppm) concentrations of hydrocarbon. The analytical results of overexcavation indicate that an 86 percent reduction in residual source contaminant concentrations was achieved by the remedial action."

On the basis of the technical data provided above, it is concluded that the remediation has been effective.

3. The Vertical and Lateral Extent of Contamination has been Defined

The statement that "you are required to investigate the depth and lateral spread of the contamination in the pit" has apparently been made without reference, review or understanding of the certified results of the previous investigation and remedial action. As presented in the Closure Report, the excavation has removed a volume of soil 4.5 feet in length and width and 4.5 feet deep. Two of the three sidewall samples contained nondetectable levels of contamination (<10 ppm). The third sidewall sample contained 13 ppm, or three ppm above the detection limit. For all practical intents and purposes, the lateral extent of contamination has been defined. The vertical extent of contamination has also been defined. As previously reported, two borings (B1 and B2) have been drilled in the area of the source. Both borings were sampled continuously under the direct supervision of a California Registered Geologist. Both borings were field monitored using a photoionization detector. Representative soil samples collected from 6.5 feet and 30.5 feet in the first boring, located directly adjacent (<2 feet) to the kerosene tank, contained nondetectable concentrations as determined by results of certified laboratory analysis. Soil samples collected from 10, 15 and 30.5 feet in the second boring also contained nondetectable concentrations of hydrocarbons.

On the basis of the discussion presented above, it is concluded that the lateral and vertical extent of contamination has been defined.

Mr. Len Overholser
Pacific Trust Company
December 18, 1990
Page 4

4. Requirements for Groundwater Monitoring or for Further Investigative Activities are not in Accordance with the Tenets of the Porter Cologne Water Quality Control Act

The discussion presented above provides the evaluation that 1) the release was not significant, 2) the remedial action was effective and 3) the vertical and lateral extent of contamination has been defined. As previously discussed in the Closure Report, the characteristics of the hydrogeologic setting preclude any significant impact to waters of the state. Groundwater is located at a depth of 61 feet below grade and is separated from the overlying unsaturated zone by a five foot thick confining clay layer. The amount of residual contamination present in site soil may amount to a total volume of 0.6 gallons of product. It has been demonstrated in the foregoing discussion and on the basis of available data presented in the Closure Report that the past, present and future beneficial uses of groundwater have not and will not be impacted by the small quantity of hydrocarbon remaining in site soil. Nor are the residual contaminant concentrations likely to have any significant risk with respect to human health or the environment. For impact to occur, the contaminant must travel from the source, through the environmental medium, to a receptor. The overwhelming preponderance of evidence collected to date indicates not only that the very source of the contamination is insignificant, but also that over a period of thirty years, the contamination has not migrated further than five feet from the source.

The RWQCB and Local Implementing Agency (LIA), in this instance the ACHCSA, derive their authority to require investigation of site conditions from Section 13267 (b) of the Porter Cologne Water Quality Control Act. This section states that "the burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the report." With deference to the opinions of the ACHCSA, it is respectfully submitted that the technical data, evaluations and conclusions presented above and in previous reports provide no technical basis to support the requirement for further work.

COMMENT #2 "You must submit copies of the hazardous waste manifests for the tanks and tank liquids signed by a representative of the treatment and disposal facility that received the waste."

Mr. Len Overholser
Pacific Trust Company
December 18, 1990
Page 5

Response

A signed copy of the hazardous waste manifest for the tanks has been transmitted to Pacific Trust. It is my understanding that the hazardous waste manifest for the tank liquids was to have been transmitted to Pacific Trust by the applicable contractor. The hazardous waste contractors are required, by law, to furnish Pacific Trust with this information. In the event that this information has not been received, please contact me immediately. Should the information be available, please provide a copy of the information to the ACHCSA as an attachment to your cover letter for this report.

COMMENT #3 - "A contamination report is required for the site. I discussed this issue with Chris French, who agreed to complete this form and forward it to my office."

Response

The Unauthorized Release Report Form has been completed and forwarded to Pacific Trust for submittal to the ACHCSA. In the event that the form has not yet been submitted to the ACHCSA, please submit it as an attachment to this correspondence.

COMMENT #4 - "One of the stockpile soil (excavated soil from the tank pit) samples showed xylene levels of 0.036 parts per million (ppm). The soil should have been remediated and retested prior to being replaced in the pit. You must either provide assurance that the contaminated soil will not impact groundwater or implement a groundwater monitoring program."

Response

To protect the maximum number of beneficial uses of groundwater, the most restrictive water quality criteria should be selected. For example, it is common practice to rely on primary Maximum Contaminant Levels (MCLs) established by the Department of Health Services (DHS) as enforceable water quality standards. The soil value of 0.036 ppm is compared with a DHS MCL value of 1.75 ppm for xylenes in water. Given a strict comparison of concentrations on a per mass basis, therefore, it is noted that the mass of xylenes per unit mass soil would have to somehow multiply itself by a factor of 48.6, migrate vertically through approximately fifty feet of the substrate, permeate a five foot thick confining clay,

Mr. Len Overholser
Pacific Trust Company
December 18, 1990
Page 6

and become dissolved in an equivalent unit mass of water (one liter) in order to exceed the MCL, without being subject to the retentive capacity of site soil, adsorptive processes, biodegradation, and dispersion. Keeping this unlikely scenario in mind, it may be stated with a reasonable modicum of certainty that the potential presence of 0.036 ppm xylene in soil will not impact groundwater.

Application of the MCL may not constitute an appropriate criteria where sources of drinking water are concerned. In this case, application of a 1-in-a-million health risk estimate may be used as a measure of potential impairment by xylene of the beneficial uses of groundwater. The 0.036 ppm concentration of xylene in soil may therefore be compared to the U.S. E.P.A. Reference Dose (RfD) as presented in the EPA Integrated Risk Information System (IRIS) database (U.S. E.P.A., 1990). The RfD established by the EPA is an estimate of the exposure to human population, including sensitive subgroups, that is likely to be without appreciable risk of adverse or deleterious health effects during a lifetime of exposure to the chemical in question.

The RfD for xylene is 2 milligrams per kilogram body weight per day. Assuming exposure to a 10 kilogram child, the target population would have to ingest approximately 556 kilograms of the contaminated soil per day in order to be exposed to concentrations of the contaminant in excess of the RfD. Assuming a per mass equivalence of the contaminant in drinking water, this amounts to 556 liters. Taking into account that the average human consumes approximately two liters of fluid per day, it may be stated with virtual certainty that the trace xylene concentration poses no risk of impairment to the beneficial uses of groundwater, if risk to human health is considered an appropriate criteria.

SUMMARY AND CONCLUSIONS

The discussion provided above clearly and conclusively demonstrates that the weight of technical evidence refutes the assertions and allegations made by the ACHCSA. The overexcavation has resulted in an 84% decrease in the average magnitude of contaminant concentration. Considering that this has occurred within a vertical interval of 4.5 feet, and that concentrations at 6.5 feet were not detectable based upon analysis by a DHS certified analytical laboratory, the release of hydrocarbons clearly has not been significant. The vertical and lateral extent of contamination has been defined on the basis of sampling during remediation and during installation of two exploratory borings. Subsurface investigations indicate that groundwater is located at a depth of approximately 61

Mr. Len Overholser
Pacific Trust Company
December 18, 1990
Page 7

feet and is separated from overlying strata by a five foot thick confining clay layer. The data indicate that detectable concentrations of contamination have not migrated more than five feet away from the source area in thirty years. This constitutes less than 10 percent of the vertical distance to groundwater. On the basis of the technical data and discussion provided above, it may be concluded that the burden, including cost, of the ACHCSA requirement for further investigation and reporting clearly bears no reasonable relationship to the need for the investigation and the benefit derived therefrom. Consequently, the requirements for further investigative activities are not in accordance with the regulatory requirements of the Porter Cologne Water Quality Control Act, Section 13267 (b).

Copies of this response to comments should be submitted to:

Attn: Tom Callaghan
Regional Water Quality Control Board
1800 Harrison Street, Rm. 700
Oakland, CA 94607

Attn: Pam Evans
Alameda County Health Care Agency
80 Swan Way
Suite 200
Oakland, CA 94621

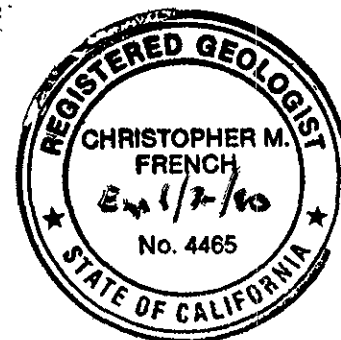
Additional copies of this letter have been provided for the purpose of regulatory submittal. Should you have any questions or comments regarding the evaluations presented herein, please call.

Very truly yours,

CHRISTOPHER M. FRENCH, R.G.



Christopher M. French, R.G., R.E.A.
Registered Geologist # 4465 (Exp. 6/30/92)
Registered Environmental Assessor #307 (Exp. 6/30/91)
CMF/9023



UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

EMERGENCY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	FOR LOCAL AGENCY USE ONLY I HEREBY CERTIFY THAT I AM A DESIGNATED GOVERNMENT EMPLOYEE AND THAT I HAVE REPORTED THIS INFORMATION TO LOCAL OFFICIALS PURSUANT TO SECTION 25180.7 OF THE HEALTH AND SAFETY CODE. SIGNED: <u>Janet G. Evans</u> DATE: <u>12-27-90</u>
REPORT DATE <u>1</u> <u>1</u> <u>1</u> <u>4</u> <u>9</u> <u>0</u>	CASE #	

REPORTED BY	NAME OF INDIVIDUAL FILING REPORT <u>CHRISTOPHER M. FRENCH</u>	PHONE <u>(415) 537-2520</u>	SIGNATURE 	
	REPRESENTING <input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> LOCAL AGENCY <input type="checkbox"/> OTHER	COMPANY OR AGENCY NAME <u>C.M. FRENCH & ASSOCIATES</u>		
	ADDRESS <u>20156 STANTON AVE No. 23</u> <u>CASIMO VALLEY CA.</u> <u>94546</u> <small>STREET CITY STATE ZIP</small>			

RESPONSIBLE PARTY	NAME <u>PACIFIC TRUST COMPANY</u> <input type="checkbox"/> UNKNOWN	CONTACT PERSON <u>MR. LEN OERHOLSER</u>	PHONE <u>(408) 244-9605</u>
	ADDRESS <u>1245 SOUTH WINCHESTER BLVD.</u> <u>SAN JOSE, CA.</u> <u>95128</u> <small>STREET CITY STATE ZIP</small>		

SITE LOCATION	FACILITY NAME (IF APPLICABLE) <u>HAYWARD MOTORS</u>	OPERATOR <u>BILL WHITE</u>	PHONE <u>(415) 886-6800</u>	
	ADDRESS <u>21450 MISSION BLVD.</u> <u>HAYWARD, CA</u> <u>ALAMEDA</u> <small>STREET CITY COUNTY ZIP</small>			
	CROSS STREET <u>GROVE</u>			

IMPLEMENTING AGENCIES	LOCAL AGENCY <u>ALAMEDA CO. HEALTH CARE SERVICES</u>	AGENCY NAME <u>Ms. PAM EVANS</u>	CONTACT PERSON PHONE <u>(415) 271-4320</u>
	REGIONAL BOARD <u>SF BAY REGION</u>		

SUBSTANCES INVOLVED	(1) NAME <u>DIESEL FROM EIGHTY (80) GALLON TANK. 35-55 GALLONS</u>	QUANTITY LOST (GALLONS) <u>240 GAL</u> <input type="checkbox"/> UNKNOWN
	(2) <u>(TANK CONTAINED 25 GALLONS DIESEL UPON REMOVAL.)</u> <input type="checkbox"/> UNKNOWN	

DISCOVERY/ABATEMENT	DATE DISCOVERED M M D D Y Y	HOW DISCOVERED <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS <input type="checkbox"/> TANK TEST <input checked="" type="checkbox"/> TANK REMOVAL <input type="checkbox"/> OTHER		
	DATE DISCHARGE BEGAN M M D D Y Y <input checked="" type="checkbox"/> UNKNOWN	METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input checked="" type="checkbox"/> REMOVE CONTENTS <input type="checkbox"/> REPLACE TANK <input checked="" type="checkbox"/> CLOSE TANK <input type="checkbox"/> REPAIR TANK <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> CHANGE PROCEDURE <input type="checkbox"/> OTHER		
	HAS DISCHARGE BEEN STOPPED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE M M D D Y Y			

SOURCE/ CAUSE	SOURCE OF DISCHARGE <input checked="" type="checkbox"/> TANK LEAK <input type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER	CAUSE(S) <input type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input type="checkbox"/> SPILL <input checked="" type="checkbox"/> CORROSION <input type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER
---------------	--	--

CASE TYPE	CHECK ONE ONLY <input type="checkbox"/> UNDETERMINED <input checked="" type="checkbox"/> SOIL ONLY <input type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)
-----------	--

CURRENT STATUS	CHECK ONE ONLY <input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT WORKPLAN SUBMITTED <input type="checkbox"/> POLLUTION CHARACTERIZATION <input type="checkbox"/> LEAK BEING CONFIRMED <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT UNDERWAY <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS <input type="checkbox"/> REMEDIATION PLAN <input checked="" type="checkbox"/> CASE CLOSED (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> CLEANUP UNDERWAY
----------------	--

REMEDIAL ACTION	CHECK APPROPRIATE ACTION(S) <small>(SEE BACK FOR DETAILS)</small> <input type="checkbox"/> CAP SITE (CD) <input type="checkbox"/> CONTAINMENT BARRIER (CB) <input type="checkbox"/> VACUUM EXTRACT (VE)	<input checked="" type="checkbox"/> EXCAVATE & DISPOSE (ED) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (IT) <input type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> VENT SOIL (VS) <input type="checkbox"/> OTHER (OT)	
-----------------	---	---	--

COMMENTS
 APPROPRIATELY STAMPED AND CERTIFIED SITE CLOSURE REPORT (10/2/90) AND SITE ASSESSMENT REPORT (4/5/90) SUBMITTED TO ACHSA AND RWQCB. SITE INVESTIGATED BY 6 BORINGS TO MAX. DEPTH OF 61 FEET. GROUNDWATER IS LOCATED AT 60.5 FEET BENEATH 5 FOOT THICK CONFINING CLAY STRATA. SAMPLES SUBMITTED FROM BENEATH USTs AT DEPTHS OF 6.5, 10, 15 AND 35 FEET ALL HAD NO DETECTABLE CONCENTRATIONS OF TPH.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

November 14, 1990

Leonard Overholser
Pacific Trust Company
1245 South Winchester Blvd
San Jose CA 95128

RE: Underground Tank Storage Removal and Site Remediation
21450 Mission Blvd, Hayward 94541

Dear Mr. Overholser:

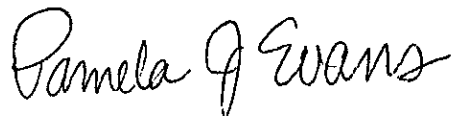
I have reviewed the Underground Storage Tank Closure Report for the above property prepared by Christopher M. French and dated October 2, 1990. The following items need to be addressed before I can recommend closure to the San Francisco Regional Water Quality Control Board (RWQCB):

1. In the first round of tank pit sampling that occurred in conjunction with the June 28 tank removal, significant levels of contamination were found in soil beneath the 80 gallon kerosene tank. Soil was "overexcavated" from the pit, and the walls and base were retested. The second round of sample results has not shown a significant drop in concentration of fuel constituents in the pit. At this point, you are required to either further investigate the depth and lateral spread of the contamination in the pit, or proceed directly to groundwater monitoring to ensure that no impact has occurred.
- x 2. You must submit copies of the hazardous waste manifests for the tanks and tank liquids signed by a representative of the treatment or disposal facility that received the waste.
- x 3. A contamination report is required for the site. I discussed this issue with Chris French, who agreed to complete this form and forward it to my office.
- ~ 4. One of the stockpile soil (excavated soil from the tank pit) samples showed xylene levels of .036 parts per million (ppm). This soil should have been remediated and retested prior to being replaced in the pit. You must either provide assurance that this contaminated soil will not impact groundwater or implement a groundwater monitoring program.

Leonard Overholser
Pacific Trust
November 14, 1990
Page 2 of 2

The deposit submitted to this office for oversight of the tank removal and subsequent remediation has been exhausted. You must submit an additional deposit of \$300.00 in order to cover past and future costs for your project to this department. You may contact me with any questions at (415)271-4320.

Sincerely,

A handwritten signature in cursive script that reads "Pamela J. Evans".

Pamela J. Evans
Hazardous Materials Specialist

c: Richard Hiett, Regional Water Quality Control Board
Howard Hatayama, Department of Health Services
Christopher M. French, R.G.



90 NOV -9 PM 2: 04

November 6, 1990

Alameda County Health Care Agency
80 Swan Way, #200
Oakland, CA 94621

Attention: Pam Evans

Re: 21450 Mission Blvd., Alameda County, CA

Dear Ms. Evans:

Enclosed is a copy of a letter dated November 1, 1990 from Christopher French with attachments for the purpose of obtaining final clearances for removal of soil from premises located at 21450 Mission Blvd., Hayward, Alameda County, CA. This information transmitted in accordance with his direction.

If you have need for any other information, please let me know.

Sincerely yours,

A handwritten signature in cursive script that reads "Leonard R. Overholser".

Leonard R. Overholser
Vice President

LRO/bo

Encls.

Christopher M. French, R.G.

RG #4465
REA #00307

ENVIRONMENTAL INVESTIGATION, REMEDIATION, AND RISK ASSESSMENT
2735 ELMWOOD AVENUE
BERKELEY, CALIFORNIA 94705
(415) 486-0722

90 NOV -9 PM 2: 04

November 1, 1990

Mr. Victor Adams
Pacific Trust Company
1245 South Winchester Blvd.
San Jose, CA 95128

Subject: Record of Soil Disposal, Hayward Motors, 21450 Mission Blvd., Alameda County, CA

Dear Mr. Adams:

The documentation for disposal of approximately 15 yards of soil, which has been removed from the subsurface of the above referenced site, is provided in Attachment A. The soil has been removed in the course of remediation of a minor diesel fuel spill discovered during closure of an eighty (80) gallon underground tank. Underground tank closure activities have been previously described in the report titled "Underground Storage Tank Closure Report, Hayward Motors, 21450 Mission Blvd., Alameda County, CA," dated October 2, 1990.

The soil has been disposed at the McKittrick Class II landfill, operated by Liquid Waste Management, Inc. Disposal records provided in Attachment A include the non-hazardous waste data form and weighmaster certificate.

Copies of this documentation should be submitted to:

Attn: Tom Callaghan
Regional Water Quality Control Board
1800 Harrison Street, Rm. 700
Oakland, CA 94607

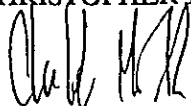
Attn: Pam Evans
Alameda County Health Care Agency
80 Swan Way, Ste. 200
Oakland, CA 94621

Additional copies of this report have been provided for the purpose of regulatory submittal.

Should you have any questions, please call.

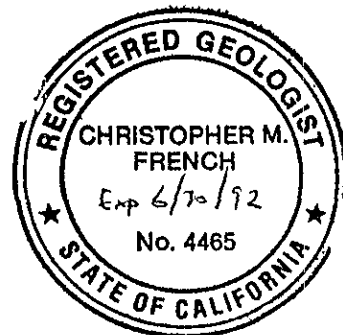
Very truly yours,

CHRISTOPHER M. FRENCH, R.G.



Christopher M. French, R.G., R.E.A.
Registered Geologist # 4465 (Exp. 6/30/92)
Registered Environmental Assessor #307 (Exp. 6/30/91)

CMF/9023
Attachments (1)



ATTACHMENT A

Soil Disposal Records

WEIGHMASTER CERTIFICATE

THIS IS TO CERTIFY that the following described commodity was weighed, measured, or counted by a weighmaster, whose signature is on this certificate, who is a recognized authority of accuracy, as prescribed by Chapter 7 (commencing with Section 12700) of Division 5 of the California Business and Professions Code, administered by the Division of Measurement Standards of the California Department of Food and Agriculture.

LIQUID WASTE MANAGEMENT, INC. — WEIGHMASTER
 STAR ROUTE BOX 4 • McKittrick, CA 93251
 (805) 762-7366

13021

WEIGHING LOCATION:

**HIGHWAY 58, 1/4 MILE WEST OF HIGHWAY 33
 McKITTRICK, CALIFORNIA**

If Waste Is Weighed it is 100% Nonhazardous

GROSS BY *Thelma Williams*

TARE BY *Thelma Williams* DEPUTY

DATE	TIME	WEIGHT IN LBS.
------	------	----------------

10-05-90	3:51PM	65460
10-05-90	4:18PM	30080
		<u>35380</u>
		<u>17.49</u>

GROSS
TARE
NET
TONS

WEIGHED FOR / SELLER *Sacchi Trust Co*

DELIVERED TO / BUYER *PLW. A1*

DRIVER *Tom Lupton*

VEHICLE LIC. NOS.	TRAILER LIC.	TRAILER LIC.	COMMODITY	UNITS	B/L NO.
<i>2C01533</i> <i>DOLLARD</i>	<i>NEW</i>		<i>Soil</i>	<i>15 yds</i>	<i>1126</i>
CARRIER <i>Willard #1</i>				FEE: <input type="checkbox"/> PD <input type="checkbox"/> CHG \$	

NON-HAZARDOUS WASTE DATA FORM

TO BE COMPLETED BY GENERATOR

NAME PACIFIC TRUST Co. ADDRESS 1245 So. WINCHESTER Blvd CITY, STATE, ZIP SAN JOSE 95128 HAYWARD, CALIF. PHONE NO. (408) 244-9605

EPA I.D. NO. EX121A11

CONTAINERS: No. 107290 VOLUME 15 YD WEIGHT _____

TYPE: TANK TRUCK DUMP TRUCK DRUMS CARTONS OTHER _____

WASTE DESCRIPTION SOIL WITH DIESEL GENERATING PROCESS UNDERGROUND STORAGE TANK REMOVAL

COMPONENTS OF WASTE		PPM	%	COMPONENTS OF WASTE		PPM	%
1.	<u>SOIL</u>		<u>99+</u>	5.			
2.	<u>DIESEL</u>		<u>LESS THAN 1</u>	6.			
3.				7.			
4.				8.			

PROPERTIES: pH _____ SOLID LIQUID SLUDGE SLURRY OTHER _____

HANDLING INSTRUCTIONS: Approval Number 100490-772

THE GENERATOR CERTIFIES THAT THE WASTE AS DESCRIBED IS 100% NON-HAZARDOUS.

CHRISTOPHER MATTHEW FRENCH *[Signature]* 10/5/90
 TYPED OR PRINTED FULL NAME & SIGNATURE DATE

TRANSPORTER

NAME DILLARD TRUCKING INC. ADDRESS ROUTE 1 Box 73 CITY, STATE, ZIP BYRON CA. 94514 PHONE NO. (415) 634-0567

EPA I.D. NO. CA1D19181161912181019

TRUCK UNIT, I.D. NO. 71 THOMAS E. UTON *[Signature]* 10-05-90
 TYPED OR PRINTED FULL NAME & SIGNATURE DATE

TSD FACILITY

NAME LIQUID WASTE MANAGEMENT ADDRESS STAR ROUTE Box 4 CITY, STATE, ZIP MEKITRICK CA 93251 PHONE NO. 805-762-7366

EPA I.D. NO. CA1D191810161316181311

DISPOSAL METHOD LANDFILL OTHER _____

THE MA-VILLINES *[Signature]* 10-5-90
 TYPED OR PRINTED FULL NAME & SIGNATURE DATE

GEN	OLD/NEW	L	A	TONS
TRANS		S	B	
C/Q		RT/CD	HWDF NONE	

PH # 60

Christopher M. French, R.G.

R.G. #4465
R.E.A. #00307

ENVIRONMENTAL INVESTIGATION, REMEDIATION, AND RISK ASSESSMENT
2735 ELMWOOD AVENUE
BERKELEY, CALIFORNIA 94705
(415) 486-0722

September 24, 1990

Ms. Pam Evans
Alameda County Health Agency
Division of Hazardous Materials
80 Swan Way, Rm. 200
Oakland, CA 94621

VIA HAND DELIVERY

Subject: Delay in Report Submittal, Hayward Motors, 21450 Mission Blvd., Alameda County

Dear Ms. Evans:

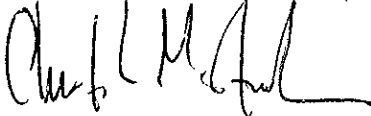
During QA/QC review of the draft report regarding tank closure activities at the above referenced site, it has been discovered that a number of analytical results have inadvertently been left out of the certified analytical report.

The analytical laboratory has been contacted regarding the discrepancy and will be issuing a revised report as soon as practicable. In the interim, I regret to inform you that submittal of the closure report will be temporarily delayed.

Thank you for your understanding in this matter.

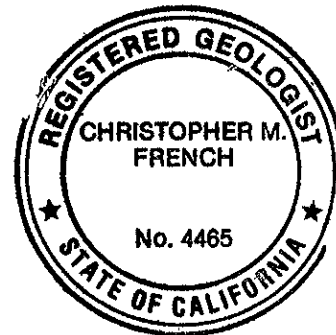
Very truly yours,

CHRISTOPHER M. FRENCH, R.G., R.E.A.



Christopher M. French, R.G., R.E.A.
Consultant

cc: Mr. Victor Adams, Pacific Trust



Christopher M. French, R.G.

RG #4465
REA #00307

ENVIRONMENTAL INVESTIGATION REMEDIATION AND RISK ASSESSMENT
2735 ELMWOOD AVENUE
BERKELEY CALIFORNIA 94705
(415) 486-0722

90 JUL 25 AM 10:45

July 24, 1990

Ms. Pam Evans
Hazardous Materials Specialist
Alameda County Health Agency
80 Swan Way, Rm. 200
Oakland, CA 94621

Subject: Preliminary Results of Verification Sampling at
Hayward Motors, 21450 Mission Blvd., Alameda County, CA

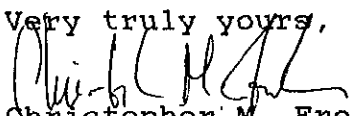
Dear Ms. Evans:

Certified analytical results have been received for samples collected during tank closure activities at the above referenced address. Results indicate that all constituents were below detection for soil samples collected from beneath the two underground gasoline tanks removed from the site.

A small quantity (140 ppm) of total petroleum hydrocarbons as kerosine (TPHK) was detected in soil collected from beneath the 80 gallon kerosine tank. In accordance with the provisions of Section 13272 (a) of the Porter Cologne Water Quality Control Act, it is our opinion that the small amount measured in site soil does not constitute a reportable quantity. Furthermore, previous sampling and analysis conducted at the site indicate that past, present and future beneficial uses of waters of the state have not been impacted by the site. In the interest of prudence and caution, Pacific Trust Company has requested that soil containing small quantities of kerosine be removed from beneath the former 80 gallon tank. Accordingly, soil will be excavated on 24 July 1990 and stockpiled on site pending verification of analytical results. In addition, verification sampling of the overexcavation will be performed to demonstrate the efficacy of soil removal activities. This information is being provided to you pursuant to regulations contained within 40 Code of Federal Regulations (CFR) 280.66 (d).

A complete report of all underground tank closure activities will be submitted to you in the near future. Should you have any questions, please call.

Very truly yours,


Christopher M. French, R.G., R.E.A.
Registered Geologist No. 4465 (Exp. 6/30/91)

cc: Mr. Victor Adams, Pacific Trust

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

Hazardous Materials Inspection Form

II, III

v. health
whr. facility
ye files

Site ID # _____ Site Name Hayward Motors Today's Date 6/28/90

Site Address 21450 Mission Blvd

City Hayward Zip 94541 Phone _____

MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:

3 tanks removed from this site today:
 1,000 gal gasoline - some holes apparent top + sides ^{500 gal?}
 2,000 gal gasoline - good condition (actually 1000 gal)
 400 gal Kerosene was actually less than
 ← 100 gallons. Several small holes visible
 at ends + bottom of tank. Workers reported liquid in side.
 Property leaser, Bill White indicated a few
 decades had passed since tanks were used
 to store product. ~~was~~ believed to be ~~approx~~ 500
 gal. He has operated Hayward Motors at this
 site for 15 years and has been familiar with
 the site for over 30 years, he says.
 NO groundwater observed in tank pit
 Manifests for removed tanks 89924634 - to go
 to Erikson facility in Richmond
 Samples taken by Chris French ~~by~~ KTW & Associates
 contractor.
 Lacquer/solvent odor was noticeable at the site,
 however, soil had no apparent contamination beyond the
 1st foot around kerosene tank. Possible soaked soil beneath

BUSINESS PLANS (Title 19)

- 1. Immediate Reporting 2703
- 2. Bus. Plan Stds. 25503(b)
- 3. R/R Cars > 30 days 25503.7
- 4. Inventory Information 25504(a)
- 5. Inventory Complete 2730
- 6. Emergency Response 25504(b)
- 7. Training 25504(c)
- 8. Deficiency 25505(a)
- 9. Modification 25505(b)

II.B ACUTELY HAZ. MAT'L'S

- 10. Registration Form Filed 25533(a)
- 11. Form Complete 25533(b)
- 12. RMPP Contents 25534(c)
- 13. Implement Sch. Req'd? (Y/N) _____
- 14. OffSite Conseq. Assess. 25524(c)
- 15. Probable Risk Assessment 25534(d)
- 16. Persons Responsible 25534(g)
- 17. Certification 25534(f)
- 18. Exemption Request? (Y/N) 25536(b)
- 19. Trade Secret Requested? 25538

III. UNDERGROUND TANKS (Title 23)

- General
- 1. Permit Application 25284 (H&S)
 - 2. Pipeline Leak Detection 25292 (H&S)
 - 3. Records Maintenance 2712
 - 4. Release Report 2651
 - 5. Closure Plans 2670

- Monitoring for Existing Tanks
- 6. Method
 - 1) Monthly Test
 - 2) Daily Vadose
 - Semi-annual groundwater
 - One time soils
 - 3) Daily Vadose
 - One time soils
 - Annual tank test
 - 4) Monthly groundwater
 - One time soils
 - 5) Daily Inventory
 - Annual tank testing
 - Cont pipe leak det
 - Vadose/gndwater mon.
 - 6) Daily Inventory
 - Annual tank testing
 - Cont pipe leak det
 - 7) Weekly Tank Gauge
 - Annual tank testing
 - 8) Annual Tank Testing
 - Daily Inventory
 - 9) Other _____

- 7. Precs Tank Test 2643
- Date: _____
- 8. Inventory Rec. 2644
- 9. Soil Testing . 2646
- 10. Ground Water. 2647

- New Tanks
- 11. Monitor Plan 2632
 - 12. Access. Secure 2634
 - 13. Plans Submitt 2711
 - Date: _____
 - 14. As Built 2635
 - Date: _____

Rev 6/88

Contact: K.M. Krause
 Title: Pres. MGR
 Signature: [Signature]

Inspector: _____
 Signature: Pamela J. Quana

II, III

**STATE
COMPENSATION
INSURANCE
FUND**

P.O. BOX 807, SAN FRANCISCO, CA 94101-0807

CERTIFICATE OF WORKERS' COMPENSATION INSURANCE

JUNE 8, 1990

POLICY NUMBER: 0612912 - 90
CERTIFICATE EXPIRES: 4-15-91

┌
KTW AND ASSOCIATES
43289 OSGOOD ROAD
FREMONT
CA 94539

L
This is to certify that we have issued a valid Workers' Compensation insurance policy in a form approved by the California Insurance Commissioner to the employer named below for the policy period indicated.

This policy is not subject to cancellation by the Fund except upon ten days' advance written notice to the employer.

We will also give you TEN days' advance notice should this policy be cancelled prior to its normal expiration.

This certificate of insurance is not an insurance policy and does not amend, extend or alter the coverage afforded by the policies listed herein. Notwithstanding any requirement, term, or condition of any contract or other document with respect to which this certificate of insurance may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies.


PRESIDENT

**ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
80 SWAN WAY, ROOM 200**

**OAKLAND, CA 94621
PHONE NO. 415-271-4320**

ACCEPTED
DEPARTMENT OF ENVIRONMENTAL HEALTH
470 - 27th Street, 1st Floor
Oakland, CA 94612
Telephone: (415) 374-7237

These plans have been reviewed and found to be acceptable and consistent with the requirements of State and local laws. Changes to the plans indicated by the Department are being made in accordance with the permit or order. A permit is now being issued for the construction of the project. The contractor must be on the job every day to all contractors and craftsmen involved with the removal.

Any change or alterations to these plans and specifications must be submitted to this Department and to the Fire and Building Inspector to determine if such changes meet the requirements of State and local laws. Notify this Department at least 48 hours prior to the following required inspections:

- _____ Removal of Tank and Piping
- _____ Sampling
- _____ Final Inspection

Issuance of a permit is dependent on compliance with accepted plans and all applicable laws and regulations.

THIS IS A MINIMUM REQUIREMENT NOT
A GUARANTEE OF SUCCESS

PC
6-21-90

UNDERGROUND TANK CLOSURE/MODIFICATION PLANS
Pen Ink Changes in red added 6-21-90 by PC - phone conversation with Thomas Gregory of KTW & Associates.

1. Business Name Hayward Motors
Business Owner Pacific Trust
2. Site Address 21450 Mission Blvd.
City Hayward Zip 94505 Phone 408 244-9605
3. Mailing Address 1245 S. Winchester Blvd.
City San Jose Zip 95128 Phone 408 244-9605
4. Land Owner same
Address _____ City, State _____ Zip _____
5. EPA I.D. No. CAC 000289617
6. Contractor K.T.W. & Associates, Inc.
Address 43289 Osgood Road
City Fremont 94539 Phone 415 623-0480
License Type C61-D40 B ID# 572427
7. Consultant same (Thomas Gregory)
Address _____
City _____ Phone _____

8. Contact Person for Investigation

Name Victor Adams Title Trust Officer
Phone 408 244-9605

9. Total No. of Tanks at facility 3

10. Have permit applications for all tanks been submitted to this office? Yes [] No []

11. State Registered Hazardous Waste Transporters/Facilities

a) Product/Waste Tranporter

Name H & H Ship EPA I.D. No. CAD 004771168
Address 220 China Basin
City San Francisco State CA Zip 94107

b) Rinsate Transporter

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

c) Tank Transporter

Name Excel Trans, Inc. EPA I.D. No. CAD 981982663
Address 2990 G. Bay Vista Court
City Benicia State CA Zip 94530

d) Tank Disposal Site

Name Erickson, Inc. EPA I.D. No. CAD 009466392
Address 255 Parr Blvd.
City Richmond State CA Zip 94801

e) Contaminated Soil Transporter

Name N/A Excel Trans (if needed) EPA I.D. No. (see above)
Address _____
City _____ State _____ Zip _____

12. Sample Collector

Name Christopher M. French R.G. #4465
 Company K.T.W. & Associates
 Address 43289 Osgood Road
 City Fremont State CA Zip 94539 Phone 415 623-0480

13. Sampling Information for each tank or area

Tank or Area		Material sampled	Location & Depth
Capacity	Historic Contents (past 5 years)		
1,000 gallon	gasoline	native soil (2)	2 feet below backfill interface
2,000 gallon	gasoline	native soil (2)	
400 gallon	kerosene	native soil (1)	

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

If yes, describe. unknown

15. NFPA methods used for rendering tank inert? Yes [X] No []

If yes, describe. CO2 displacement

An explosion proof combustible gas meter shall be used to verify tank inertness.

16. Laboratories

Name Anametrix, Inc.
 Address 1961 Concourse Drive, Suite E
 City San Jose State CA Zip 95131
 State Certification No. 151

17. Chemical Methods to be used for Analyzing Samples

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Number
gasoline -TPHG, BTXE gasoline -TPHG, BTXE kerosene -TPHD, BTXE	5030 (or 8020) 5030 prep method 5030 prep method	8020, 5030 GC FID/DHS method 3020/5030 GC FID 3550 GC/FID

18. Submit Site Safety Plan see attached

19. Workman's Compensation: Yes [X] No []

Copy of Certificate enclosed? Yes [] No [X]

Name of Insurer on file with ACHCSA (STATE FUND)

20. Plot Plan submitted? Yes [X] No []

21. Deposit enclosed? Yes [X] No []

22. Please forward to this office the following information within 60 days after receipt of sample results.

- a) Chain of Custody Sheets
- b) Original Signed Laboratory Reports
- c) TSD to Generator copies of wastes shipped and received
- d) Attachment A summarizing laboratory results

I declare that to the best of my knowledge and belief the statements and information provided above are correct and true. I understand that information in addition to that provided above may be needed in order to obtain an approval from the Department of Environmental Health and that no work is to begin on this project until this plan is approved.

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

I understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Safety and Health Administration) requirements concerning personnel and safety.

I will notify the Department of Environmental Health at least two (2) working days (48 hours) after approval of this closure plan in advance to schedule any required inspections. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility is not shared nor assumed by the County of Alameda.

Signature of Contractor

Name (please type) Kevin M. Krause
Signature *K. M. Krause*
Date 6-19-90

Signature of Site Owner or Operator

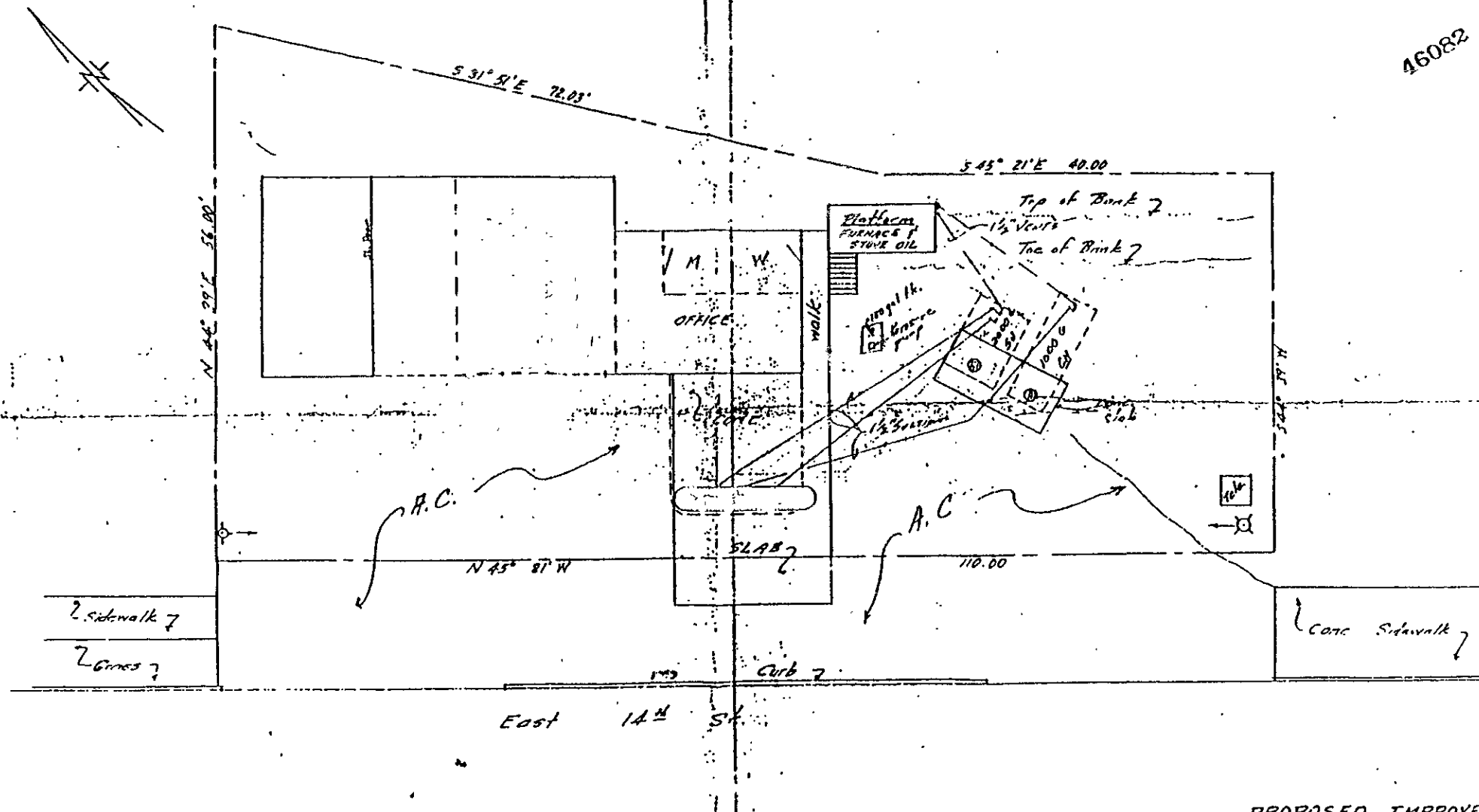
Name (please type) Victor Adams for Pacific Trust
Signature *Victor L. Adams*
Date 6/19/90



Victor L. Adams
Vice-President and
Trust Officer

1245 South Winchester Blvd.
San Jose, California 95128
(408) 244-9605
FAX (408) 241-4742

46082



Source: "Proposed Improvements, Service Station 7-636,
 21450 East 14th St., Hayward."
 Dated 2/28/54
 Alameda County Public Works Agency

PROPOSED IMPROVEMENTS
 SERVICE STATION 7-636
 21450 E 14th ST. HAYWARD
 SCALE: 1" = 10' FEB. 28 1954
 Mission KCC
 [Signature]

Christopher M. French, R.G.

ENVIRONMENTAL INVESTIGATION, REMEDIATION, AND RISK ASSESSMENT

SITE PLAN (1954)

Pacific Trust Company

Job Number 9023	Date 12/89	Plate 3
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**STATE
COMPENSATION
INSURANCE
FUND**

P.O. BOX 807, SAN FRANCISCO, CA 94101-0807

CERTIFICATE OF WORKERS' COMPENSATION INSURANCE

JUNE 8, 1990

POLICY NUMBER: 0612912 - 90
CERTIFICATE EXPIRES: 4-15-91

┌
KTW AND ASSOCIATES
43289 OSGOOD ROAD
FREMONT
CA 94539

└
This is to certify that we have issued a valid Workers' Compensation insurance policy in a form approved by the California Insurance Commissioner to the employer named below for the policy period indicated.

This policy is not subject to cancellation by the Fund except upon ten days' advance written notice to the employer.

We will also give you TEN days' advance notice should this policy be cancelled prior to its normal expiration.

This certificate of insurance is not an insurance policy and does not amend, extend or alter the coverage afforded by the policies listed herein. Notwithstanding any requirement, term, or condition of any contract or other document with respect to which this certificate of insurance may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies.


PRESIDENT



SAFETY PLAN

Road, Fremont, Calif. 94539
(415) 623-0480
Lic. # 572427

SITE SAFETY PLAN

Pacific Trust
Hayward Motors
21450 Mission Blvd.
Hayward, California 94505

Introduction:

A Site Safety Plan (SSP) has been designed to address safety provisions during the site tank removal. Its purpose is to provide established procedures to protect all on-site personnel from direct skin contact, inhalation, or ingestion of potentially hazardous materials that may be encountered at the site. The SSP establishes personnel responsibilities, personal protective equipment standards, decontamination procedures, and emergency action plans.

K.T.W. & Associates seeks to enter the property previously described for the purpose of conducting a standard tank removal - soil sample procedures are as follows.

Each sample to be chemically analyzed will be collected in a brass sleeve, capped with aluminum foil lined plastic lids, sealed with tape, and placed on blue ice at or below 4 degrees Centigrade in a cooler immediately. All Chain of Custody protocol will be followed.

This SSP describes means for protecting all on-site personnel from contamination or personal injury while conducting on-site activities. As described below, we will strive to meet all requirements mandated by the California Department of Health Services.

Responsibilities of Key Personnel:

All personnel on-site will have assigned responsibilities. Thomas Gregory will serve as Project Manager. Mr. Gregory will also serve as Site Safety Officer (SSO). As SSO, Mr. Gregory will assure that on-site personnel have received a

copy of SSP. Compliance with the SSP will be monitored at all times by the SSO. Appropriate personnel protective equipment, will be available and utilized by all on-site personnel.

Christopher French R.G. #4465 will be responsible for keeping field notes, collecting and securing samples, and assuring sample integrity by adherence to Chain of Custody protocol. All on-site employees will take reasonable precautions to avoid unforeseen hazards. After documenting understanding of the SSO, each on-site employee will be responsible for strict adherence to all points contained herein. On-site employees are held responsible to perform only those tasks for which they believe they are qualified. Provisions of the SSO are mandatory and personnel associated with on-site activities will adhere strictly hereto.

Job Hazard Analysis:

Hazards likely to be encountered on-site include those commonly encountered when operating any mechanical equipment, such as the danger of falling objects or moving machinery. Simple precautions will reduce or eliminate risks associated with operating such equipment.

Qualified personnel only will have any contact with equipment. All on-site personnel are required to wear hard hats when in close proximity to equipment. Latex sampling gloves will be worn by persons collecting or handling samples to prevent exposure to contaminants. Gloves will be changed between samples, and used ones discarded, to avoid cross-contamination. Furthermore, no on-site smoking, open flame, or sparks will be permitted in order to prevent accidental ignition.

Mechanical Safeguards:

- Provide adequate working space around equipment.
- Do not stand near backhoe buckets and earthmoving equipment.
- Verify that all equipment is in good condition.
- Do not stand or walk under elevated loads or ladders.
- Do not stand near unguarded excavation and trenches.

- Do not enter excavation or trenches over 5 feet deep that are not properly guarded, shored, or sloped.
- Consult SSO if other mechanical hazards exist.

Risk Assessment Summary:

Exposure to chemicals anticipated on-site include gasoline, benzene, toluene, xylene and ethylbenzene (BTX&E). These chemicals present a hazard because they are moderately to extremely toxic and most are highly flammable. Threshold Limit Values (TLV's), Short Term Exposure Limits (STEL's) and Toxicity levels (LD50, oral-rate), all in mg/kg (ppm), are listed below.

<u>Compound</u>	<u>TLV</u>	<u>STEL</u>	<u>Toxicity</u>
Gasoline	50	75	
Benzene	10.0	150	4894
Toluene	10.0	150	5000
Xylene	10.0	150	4300
Kerosene	300	150	

Personal Protective Equipment:

Personnel on-site will have access to appropriate personal protective equipment (level C or greater). When handling samples, the on-site geologist will wear latex gloves.

Work Zones:

Access to the site will be restricted to authorized personnel. A set of cones, placards, or wide yellow tape, surrounding the site will define the perimeter. The Project Manager will be responsible for site security.

Decontamination Measures:

Avoidance of contamination whenever possible is the best method for protection. Common sense dictates that on-site personnel avoid sitting, leaning, or placing equipment on possibly contaminated soil. All personnel

will be advised to wash their hands, neck and face with soap and water following each day's use.

General Safe Work Practices:

Personal safety and hygiene should be of utmost consideration while on-site. To prevent ingestion of contaminants no person shall be allowed to eat, drink, or smoke on the site. The SSO will designate an appropriate near-by area, where it will be safe to allow lunches, etc.

During the inerting process, and during removal, an explosimeter (Gas-Tech) will be on-site to determine proper levels. This instrument is factory serviced every six (6) months, and is calibrated within 24 hours prior to use in the field. Two (2) ABC rated fire extinguishers will be on-site for the duration of the project.

Medical Surveillance Program:

According to CFR 29, 1910.120, Paragraph (F), employees who wear respirators 30 days or more during one year or who have been exposed to hazardous substances or health hazards above established permissible exposure limits are required to be monitored medically. All site personnel will be required to have had a complete chemical/physical examination to comply with the medical monitoring program.

Contingency Plans:

In the event of accident, injury, or other emergency, the Project Director, Senior Project Manger, or other person will notify appropriate governmental agencies or individuals as follows:

1. Alameda County Health Care Services
80 Swan Way, Room 200
Oakland, California
415 271-4320

2. Police/Fire/EMT
911

3. CHEMTREC
1 800 424-9300

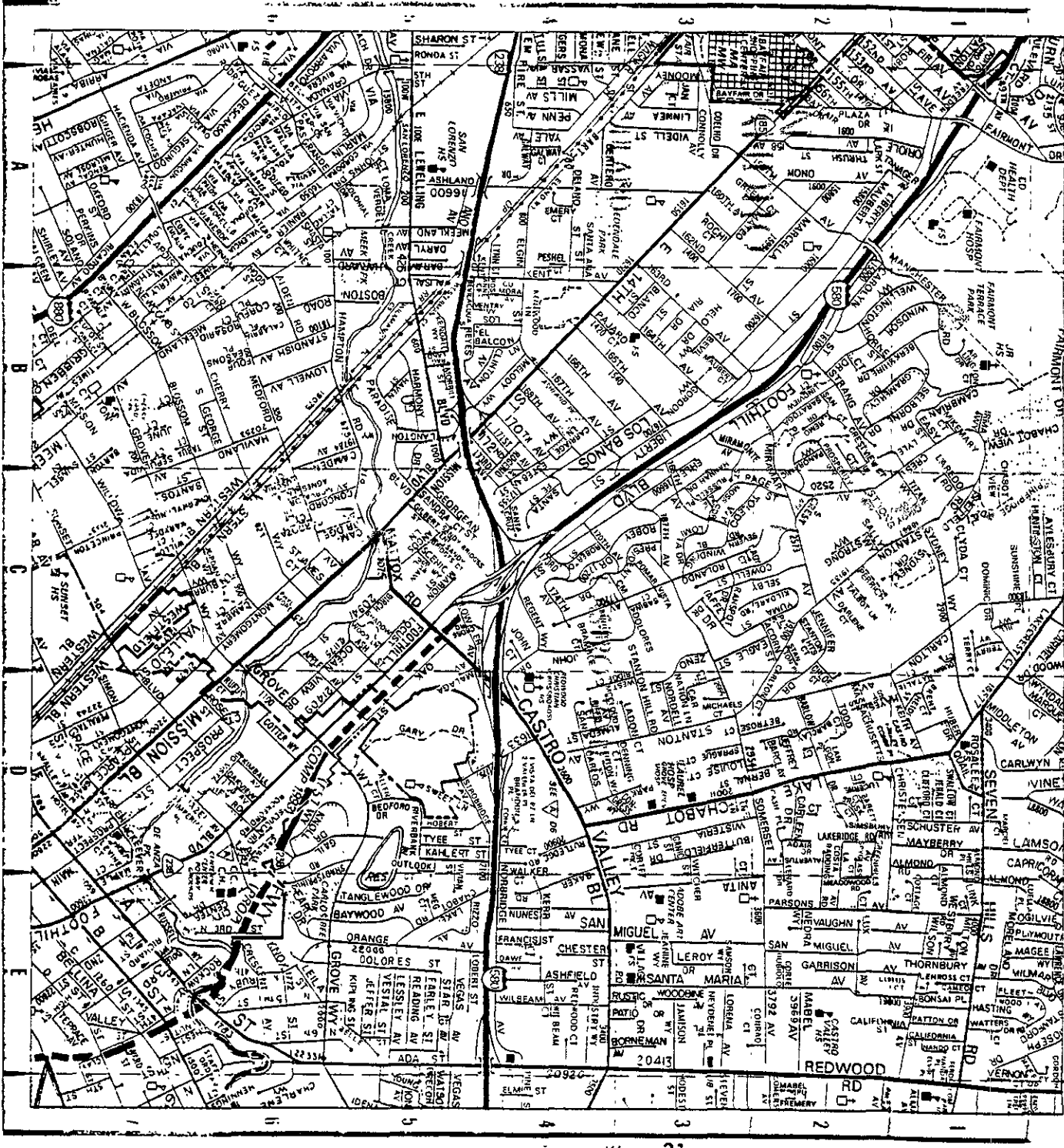
In the event of a mobile injury, the casualty shall be transported to the Laurel Hospital, Lake Chabot Road (415) 537-1234. To reach the facility, the transporting unit will travel north on Mission Boulevard to Mattox Road, proceed east on Mattox Road to the Castro Valley Boulevard (a continuation) until Lake Chabot Road ends at Castro Valley Boulevard. Turning north onto Lake Chabot Road, and then west into the facility emergency entrance, the transporting unit will be met by previously notified personnel at the hospital.

SIGNED BY K.T.W. & ASSOCIATES ON SITE PERSONNEL:

_____	_____
	Date
_____	_____
	Date
_____	_____
	Date
_____	_____
	Date
_____	_____
	Date

28

28



1-310

1-311

175 of VADTIV of Map 58

1-312

1-315

FOR CANTONWAY SEE MAP 26

31

YRIGH 1988



FORM 'A':
SITE

UNDERGROUND STORAGE TANK PROGRAM
FACILITY/SITE, INFORMATION and/or PERMIT APPLICATION

COMPLETE THIS FORM FOR EACH FACILITY/SITE

MARK ONLY ONE ITEM	<input type="checkbox"/> 1 NEW PERMIT	<input type="checkbox"/> 3 RENEWAL PERMIT	<input type="checkbox"/> 5 CHANGE OF INFORMATION	<input checked="" type="checkbox"/> 7 PERMANENTLY CLOSED SITE
	<input type="checkbox"/> 2 INTERIM PERMIT	<input type="checkbox"/> 4 AMENDED PERMIT	<input type="checkbox"/> 6 TEMPORARY SITE CLOSURE	

I. FACILITY/SITE INFORMATION & ADDRESS — (MUST BE COMPLETED)

FACILITY/SITE NAME PACIFIC TRUST		CARE OF ADDRESS INFORMATION 90 VICTOR ADAMS		
ADDRESS 21450 MISSION ST. 24750		NEAREST CROSS STREET	<input checked="" type="checkbox"/> Box to indicate CORPORATION <input type="checkbox"/> INDIVIDUAL	<input type="checkbox"/> PARTNERSHIP LOCAL-AGENCY <input type="checkbox"/> COUNTY-AGENCY <input type="checkbox"/> STATE-AGENCY <input type="checkbox"/> FEDERAL-AGENCY
CITY NAME HAYWARD	STATE CA	ZIP CODE 94541	SITE PHONE #, WITH AREA CODE (408) 244-9605	
TYPE OF BUSINESS <input checked="" type="checkbox"/> 1 GAS STATION <input type="checkbox"/> 2 DISTRIBUTOR <input type="checkbox"/> 3 FARM <input type="checkbox"/> 4 PROCESSOR <input type="checkbox"/> 5 OTHER	<input checked="" type="checkbox"/> Box if INDIAN RESERVATION or TRUST LANDS <input type="checkbox"/>	EPA ID #	# of TANK's AT THIS SITE 3	
EMERGENCY CONTACT PERSON (PRIMARY) DAYS: NAME (LAST, FIRST) ADAMS, VICTOR PHONE # WITH AREA CODE (408) 244-9605 NIGHTS: NAME (LAST, FIRST) Same PHONE # WITH AREA CODE		EMERGENCY CONTACT PERSON (SECONDARY) DAYS: NAME (LAST, FIRST) Same PHONE # WITH AREA CODE NIGHTS: NAME (LAST, FIRST) Same PHONE # WITH AREA CODE		

II. PROPERTY OWNER INFORMATION & ADDRESS — (MUST BE COMPLETED)

NAME PACIFIC TRUST		CARE OF ADDRESS INFORMATION 90 VICTOR ADAMS		
MAILING or STREET ADDRESS 1245 S. WINCHESTER		<input checked="" type="checkbox"/> Box to indicate CORPORATION <input type="checkbox"/> INDIVIDUAL	<input type="checkbox"/> PARTNERSHIP LOCAL-AGENCY <input type="checkbox"/> COUNTY-AGENCY	<input type="checkbox"/> STATE-AGENCY <input type="checkbox"/> FEDERAL-AGENCY
CITY NAME SAN JOSE	STATE CA	ZIP CODE 95128	PHONE #, WITH AREA CODE 408 244-9605	

III. TANK OWNER INFORMATION & ADDRESS — (MUST BE COMPLETED)

NAME SAME		CARE OF ADDRESS INFORMATION		
MAILING or STREET ADDRESS		<input checked="" type="checkbox"/> Box to indicate CORPORATION <input type="checkbox"/> INDIVIDUAL	<input type="checkbox"/> PARTNERSHIP LOCAL-AGENCY <input type="checkbox"/> COUNTY-AGENCY	<input type="checkbox"/> STATE-AGENCY <input type="checkbox"/> FEDERAL-AGENCY
CITY NAME	STATE	ZIP CODE	PHONE #, WITH AREA CODE	

IV. LEGAL NOTIFICATION AND BILLING ADDRESS

CHECK ONE (1) BOX INDICATING WHICH ABOVE ADDRESS SHOULD BE USED FOR BOTH LEGAL NOTIFICATION AND BILLING: I. II. III.

THIS FORM HAS BEEN COMPLETED UNDER PENALTY OF PERJURY, AND TO THE BEST OF MY KNOWLEDGE, IS TRUE AND CORRECT.

APPLICANT'S NAME (PRINTED & SIGNATURE) K.M. Krause for PACIFIC TRUST	DATE 6-5-90
--	-----------------------

LOCAL AGENCY USE ONLY

COUNTY #	JURISDICTION #	AGENCY #	FACILITY ID #	# of TANKS at SITE
CURRENT LOCAL AGENCY FACILITY ID #		APPROVED BY NAME	PHONE # WITH AREA CODE	
PERMIT NUMBER	PERMIT APPROVAL DATE	PERMIT EXPIRATION DATE		
LOCATION CODE	CENSUS TRACT #	SUPERVISOR-DISTRICT CODE	BUSINESS PLAN FILED YES <input type="checkbox"/> NO <input type="checkbox"/>	DATE FILED
CHECK #	PERMIT AMOUNT	SURCHARGE AMOUNT	FEE CODE	RECEIPT # BY:

THIS FORM MUST BE ACCOMPANIED BY AT LEAST (1) OR MORE TANK PERMIT FORM 'B' APPLICATION(S), UNLESS THIS IS A CHANGE OF SITE INFORMATION ONLY.
FORM A (3-2-88)

LOCAL AGENCY COPY

NO 38651



FORM 'B':
TANK

UNDERGROUND STORAGE TANK PROGRAM
TANK PERMIT APPLICATION INFORMATION

COMPLETE A SEPARATE FORM WITH THE FOLLOWING INFORMATION FOR EACH TANK.

NO 74792

MARK ONLY ONE ITEM	<input type="checkbox"/> 1 NEW PERMIT	<input type="checkbox"/> 3 RENEWAL PERMIT	<input type="checkbox"/> 5 CHANGE OF INFORMATION	<input type="checkbox"/> 7 PERMANENTLY CLOSED TANK
	<input type="checkbox"/> 2 INTERIM PERMIT	<input type="checkbox"/> 4 AMENDED PERMIT	<input type="checkbox"/> 6 TEMPORARY TANK CLOSURE	<input checked="" type="checkbox"/> 8 TANK REMOVED
FACILITY/SITE NAME WHERE TANK IS INSTALLED:				FARM TANK - YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>

I. TANK DESCRIPTION COMPLETE ALL ITEMS - IF UNKNOWN -- SO SPECIFY

A. OWNERS TANK ID # <u>002</u>	B. MANUFACTURED BY: <u>UNKNOWN</u>
C. YEAR INSTALLED <u>UNKNOWN</u>	D. TANK CAPACITY IN GALLONS: <u>2,000</u>

II. TANK CONTENTS IF (A.1), IS MARKED, COMPLETE ITEM C. IF (A.1), IS NOT MARKED, COMPLETE ITEM D.

A. <input checked="" type="checkbox"/> 1 MOTOR VEHICLE FUEL <input type="checkbox"/> 3 CHEMICAL PRODUCT <input type="checkbox"/> 5 HAZARDOUS <input type="checkbox"/> 80 EMPTY <input type="checkbox"/> 95 UNKNOWN	B. <input checked="" type="checkbox"/> 1 PRODUCT <input type="checkbox"/> 2 WASTE	C. <input checked="" type="checkbox"/> 1 UNLEADED <input type="checkbox"/> 4 GASAHOL <input type="checkbox"/> 7 METHANOL <input type="checkbox"/> 2 LEADED <input type="checkbox"/> 5 JET FUEL <input type="checkbox"/> 99 OTHER (DESCRIBE IN ITEM D, BELOW)
D. IF NOT MOTOR VEHICLE FUEL, ENTER NAME OF HAZARDOUS SUBSTANCE STORED & C.A.S. #		C.A.S. #:

III. TANK CONSTRUCTION MARK ONE ITEM ONLY IN BOX A, B, C, & D

A. TYPE OF SYSTEM	<input type="checkbox"/> 1 DOUBLE WALLED	<input type="checkbox"/> 3 SINGLE WALLED WITH EXTERIOR LINER	<input type="checkbox"/> 95 UNKNOWN
	<input checked="" type="checkbox"/> 2 SINGLE WALLED	<input type="checkbox"/> 4 SECONDARY CONTAINMENT	<input type="checkbox"/> 99 OTHER _____
B. TANK MATERIAL	<input checked="" type="checkbox"/> 1 STEEL/IRON	<input type="checkbox"/> 2 STAINLESS STEEL	<input type="checkbox"/> 3 FIBERGLASS
	<input type="checkbox"/> 5 CONCRETE	<input type="checkbox"/> 6 POLYVINYL CHLORIDE	<input type="checkbox"/> 7 ALUMINUM
	<input type="checkbox"/> 9 BRONZE	<input type="checkbox"/> 10 GALVANIZED STEEL	<input type="checkbox"/> 95 UNKNOWN
			<input type="checkbox"/> 4 STEEL CLAD W/FIBERGLASS REINFORCED PLASTIC
			<input type="checkbox"/> 8 100% METHANOL COMPATIBLE FRP
			<input type="checkbox"/> 99 OTHER _____
C. INTERIOR LINING	<input type="checkbox"/> 1 RUBBER LINED	<input type="checkbox"/> 2 ALKYD LINING	<input type="checkbox"/> 3 EPOXY LINING
	<input type="checkbox"/> 5 GLASS LINING	<input checked="" type="checkbox"/> 6 UNLINED	<input type="checkbox"/> 4 PHENOLIC LINING
	<input type="checkbox"/> IS LINING MATERIAL COMPATIBLE WITH 100% METHANOL?	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> 95 UNKNOWN
			<input type="checkbox"/> 99 OTHER _____
D. CORROSION PROTECTION	<input type="checkbox"/> 1 POLYETHYLENE WRAP	<input type="checkbox"/> 2 TAR OR ASPHALT	<input type="checkbox"/> 3 VINYL WRAP
	<input type="checkbox"/> 5 CATHODIC PROTECTION	<input checked="" type="checkbox"/> 91 NONE	<input type="checkbox"/> 4 FIBERGLASS REINFORCED PLASTIC
			<input type="checkbox"/> 95 UNKNOWN
			<input type="checkbox"/> 99 OTHER _____

IV. PIPING INFORMATION CIRCLE A IF ABOVE GROUND, U IF UNDERGROUND, BOTH IF APPLICABLE

A. SYSTEM TYPE	<input checked="" type="radio"/> A <input checked="" type="radio"/> U	SUCTION	<input type="radio"/> A <input type="radio"/> U	2 PRESSURE	<input type="radio"/> A <input type="radio"/> U	3 GRAVITY	<input type="radio"/> A <input type="radio"/> U	91 NONE	<input type="radio"/> A <input type="radio"/> U	95 UNKNOWN	<input type="radio"/> A <input type="radio"/> U	99 OTHER
B. CONSTRUCTION	<input checked="" type="radio"/> A <input checked="" type="radio"/> U	SINGLE WALLED	<input type="radio"/> A <input type="radio"/> U	2 DOUBLE WALLED	<input type="radio"/> A <input type="radio"/> U	3 LINED TRENCH	<input type="radio"/> A <input type="radio"/> U	91 NONE	<input type="radio"/> A <input type="radio"/> U	95 UNKNOWN	<input type="radio"/> A <input type="radio"/> U	99 OTHER
C. MATERIAL	<input checked="" type="radio"/> A <input checked="" type="radio"/> U	STEEL/IRON	<input type="radio"/> A <input type="radio"/> U	2 STAINLESS STEEL	<input type="radio"/> A <input type="radio"/> U	3 POLYVINYL CHLORIDE (PVC)	<input type="radio"/> A <input type="radio"/> U	4 FIBERGLASS PIPE	<input type="radio"/> A <input type="radio"/> U	91 NONE		
		5 ALUMINUM	<input type="radio"/> A <input type="radio"/> U	6 CONCRETE	<input type="radio"/> A <input type="radio"/> U	7 STEEL CLAD W/FRP	<input type="radio"/> A <input type="radio"/> U	8 100% METHANOL COMPATIBLE FRP				
		9 GALVANIZED STEEL	<input type="radio"/> A <input type="radio"/> U	95 UNKNOWN	<input type="radio"/> A <input type="radio"/> U	99 OTHER						

V. LEAK DETECTION SYSTEM CIRCLE P FOR PRIMARY, OR S FOR SECONDARY, A PRIMARY LEAK DETECTION SYSTEM MUST BE CIRCLED.

<input type="checkbox"/> P <input type="checkbox"/> S	1 VISUAL CHECK	<input type="checkbox"/> P <input type="checkbox"/> S	2 INVENTORY RECONCILIATION	<input type="checkbox"/> P <input type="checkbox"/> S	3 VADOSE WELLS	<input type="checkbox"/> P <input type="checkbox"/> S	4 ELECTRONIC MONITOR	<input type="checkbox"/> P <input type="checkbox"/> S	5 GROUND WATER MONITORING WELLS
<input type="checkbox"/> P <input type="checkbox"/> S	6 PRECISION TESTING	<input type="checkbox"/> P <input type="checkbox"/> S	7 PRESSURE TESTING	<input checked="" type="radio"/> P <input type="radio"/> S	91 NONE	<input type="checkbox"/> P <input type="checkbox"/> S	95 UNKNOWN	<input type="checkbox"/> P <input type="checkbox"/> S	99 OTHER _____

VI. INFORMATION ON TANK PERMANENTLY CLOSED IN PLACE

1. ESTIMATED DATE LAST USED (MO/YR)	2. ESTIMATED QUANTITY OF SUBSTANCE REMAINING IN GALLONS	3. WAS TANK FILLED WITH INERT MATERIAL? <input type="checkbox"/> YES <input type="checkbox"/> NO
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THIS FORM HAS BEEN COMPLETED UNDER PENALTY OF PERJURY, AND TO THE BEST OF MY KNOWLEDGE, IS TRUE AND CORRECT.

APPLICANT'S NAME (PRINTED & SIGNATURE) <u>K. M. KRAUSE FOR PUBLIC TRUST</u>	DATE <u>6-5-90</u>
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LOCAL AGENCY USE ONLY

COUNTY #	JURISDICTION #	AGENCY #	FACILITY ID #	TANK ID #
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
CURRENT LOCAL AGENCY FACILITY ID #		APPROVED BY NAME		PHONE # WITH AREA CODE
<input type="text"/>		<input type="text"/>		<input type="text"/>
PERMIT NUMBER	PERMIT APPROVAL DATE	PERMIT EXPIRATION DATE		
<input type="text"/>	<input type="text"/>	<input type="text"/>		
CHECK #	PERMIT AMOUNT	SURCHARGE AMT.	FEE CODE	RECEIPT #
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
BY: <input type="text"/>				



FORM 'B':
TANK

UNDERGROUND STORAGE TANK PROGRAM
TANK PERMIT APPLICATION INFORMATION

COMPLETE A SEPARATE FORM WITH THE FOLLOWING INFORMATION FOR EACH TANK

MARK ONLY ONE ITEM	<input type="checkbox"/> 1 NEW PERMIT	<input type="checkbox"/> 3 RENEWAL PERMIT	<input type="checkbox"/> 5 CHANGE OF INFORMATION	<input type="checkbox"/> 7 PERMANENTLY CLOSED TANK
	<input type="checkbox"/> 2 INTERIM PERMIT	<input type="checkbox"/> 4 AMENDED PERMIT	<input type="checkbox"/> 6 TEMPORARY TANK CLOSURE	<input checked="" type="checkbox"/> 8 TANK REMOVED
FACILITY/SITE NAME WHERE TANK IS INSTALLED:				FARM TANK - YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>

I. TANK DESCRIPTION COMPLETE ALL ITEMS - IF UNKNOWN - SO SPECIFY

A. OWNERS TANK ID #	003	B. MANUFACTURED BY:	UNKNOWN
C. YEAR INSTALLED	UNKNOWN	D. TANK CAPACITY IN GALLONS:	400XX

II. TANK CONTENTS IF (A.1), IS MARKED, COMPLETE ITEM C. IF (A.1), IS NOT MARKED, COMPLETE ITEM D.

A. <input type="checkbox"/> 1 MOTOR VEHICLE FUEL	<input checked="" type="checkbox"/> 2 PETROLEUM	B. <input checked="" type="checkbox"/> 1 PRODUCT	C. <input type="checkbox"/> 1 UNLEADED	<input type="checkbox"/> 2 LEADED	<input type="checkbox"/> 3 DIESEL
<input type="checkbox"/> 3 CHEMICAL PRODUCT	<input type="checkbox"/> 4 OIL	<input type="checkbox"/> 2 WASTE	<input type="checkbox"/> 4 GASAHOL	<input type="checkbox"/> 5 JET FUEL	<input type="checkbox"/> 6 AVIATION GAS
<input type="checkbox"/> 5 HAZARDOUS	<input type="checkbox"/> 80 EMPTY	<input type="checkbox"/> 95 UNKNOWN	<input type="checkbox"/> 7 METHANOL	<input checked="" type="checkbox"/> 99 OTHER (DESCRIBE IN ITEM D, BELOW)	
D. IF NOT MOTOR VEHICLE FUEL, ENTER NAME OF HAZARDOUS SUBSTANCE STORED & C.A.S. #			KEROSENE C.A.S. #		

III. TANK CONSTRUCTION MARK ONE ITEM ONLY IN BOX A, B, C, & D

A. TYPE OF SYSTEM	<input type="checkbox"/> 1 DOUBLE WALLED	<input type="checkbox"/> 3 SINGLE WALLED WITH EXTERIOR LINER	<input type="checkbox"/> 95 UNKNOWN
	<input checked="" type="checkbox"/> 2 SINGLE WALLED	<input type="checkbox"/> 4 SECONDARY CONTAINMENT	<input type="checkbox"/> 99 OTHER
B. TANK MATERIAL	<input checked="" type="checkbox"/> 1 STEEL/IRON	<input type="checkbox"/> 2 STAINLESS STEEL	<input type="checkbox"/> 3 FIBERGLASS
	<input type="checkbox"/> 5 CONCRETE	<input type="checkbox"/> 6 POLYVINYL CHLORIDE	<input type="checkbox"/> 7 ALUMINUM
	<input type="checkbox"/> 9 BRONZE	<input type="checkbox"/> 10 GALVANIZED STEEL	<input type="checkbox"/> 95 UNKNOWN
C. INTERIOR LINING	<input type="checkbox"/> 1 RUBBER LINED	<input type="checkbox"/> 2 ALKYO LINING	<input type="checkbox"/> 3 EPOXY LINING
	<input type="checkbox"/> 5 GLASS LINING	<input checked="" type="checkbox"/> 6 UNLINED	<input type="checkbox"/> 4 PHENOLIC LINING
	IS LINING MATERIAL COMPATIBLE WITH 100% METHANOL?		<input type="checkbox"/> 95 UNKNOWN
			<input type="checkbox"/> YES <input type="checkbox"/> NO
D. CORROSION PROTECTION	<input type="checkbox"/> 1 POLYETHYLENE WRAP	<input type="checkbox"/> 2 TAR OR ASPHALT	<input type="checkbox"/> 3 VINYL WRAP
	<input type="checkbox"/> 5 CATHODIC PROTECTION	<input checked="" type="checkbox"/> 91 NONE	<input type="checkbox"/> 4 FIBERGLASS REINFORCED PLASTIC
		<input type="checkbox"/> 95 UNKNOWN	<input type="checkbox"/> 99 OTHER

IV. PIPING INFORMATION CIRCLE A IF ABOVE GROUND, U IF UNDERGROUND, BOTH IF APPLICABLE

A. SYSTEM TYPE	A <input checked="" type="radio"/> U SUCTION	A U 2 PRESSURE	A U 3 GRAVITY	A U 91 NONE	A U 95 UNKNOWN	A U 99 OTHER
B. CONSTRUCTION	A <input checked="" type="radio"/> U 1 SINGLE WALLED	A U 2 DOUBLE WALLED	A U 3 LINED TRENCH	A U 91 NONE	A U 95 UNKNOWN	A U 99 OTHER
C. MATERIAL	A <input checked="" type="radio"/> U 1 STEEL/IRON	A U 2 STAINLESS STEEL	A U 3 POLYVINYL CHLORIDE (PVC)	A U 4 FIBERGLASS PIPE	A U 91 NONE	
	A U 5 ALUMINUM	A U 6 CONCRETE	A U 7 STEEL CLAD W/FRP	A U 8 100% METHANOL COMPATIBLE FRP		
	A U 9 GALVANIZED STEEL	A U 95 UNKNOWN	A U 99 OTHER			

V. LEAK DETECTION SYSTEM CIRCLE P FOR PRIMARY, OR S FOR SECONDARY, A PRIMARY LEAK DETECTION SYSTEM MUST BE CIRCLED.

P S 1 VISUAL CHECK	P S 2 INVENTORY RECONCILIATION	P S 3 VADOSE WELLS	P S 4 ELECTRONIC MONITOR	P S 5 GROUND WATER MONITORING WELLS
P S 6 PRECISION TESTING	P S 7 PRESSURE TESTING	<input checked="" type="radio"/> P S 91 NONE	P S 95 UNKNOWN	P S 99 OTHER

VI. INFORMATION ON TANK PERMANENTLY CLOSED IN PLACE

1. ESTIMATED DATE LAST USED (MO/YR)	2. ESTIMATED QUANTITY OF SUBSTANCE REMAINING IN GALLONS	3. WAS TANK FILLED WITH INERT MATERIAL? <input type="checkbox"/> YES <input type="checkbox"/> NO
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THIS FORM HAS BEEN COMPLETED UNDER PENALTY OF PERJURY, AND TO THE BEST OF MY KNOWLEDGE, IS TRUE AND CORRECT.

APPLICANT'S NAME (PRINTED & SIGNATURE) K.M. KRAUSE FOR PACIFIC TRUST	DATE 6-5-90
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LOCAL AGENCY USE ONLY

COUNTY #	JURISDICTION #	AGENCY #	FACILITY ID #	TANK ID #
CURRENT LOCAL AGENCY FACILITY ID #		APPROVED BY NAME		PHONE # WITH AREA CODE
PERMIT NUMBER	PERMIT APPROVAL DATE	PERMIT EXPIRATION DATE		
CHECK #	PERMIT AMOUNT	SURCHARGE AMT.	FEE CODE	RECEIPT #

NO 74793



FORM 'B':
TANK

UNDERGROUND STORAGE TANK PROGRAM
TANK PERMIT APPLICATION INFORMATION
COMPLETE A SEPARATE FORM WITH THE FOLLOWING INFORMATION FOR EACH TANK

No 74791

MARK ONLY ONE ITEM	<input type="checkbox"/> 1 NEW PERMIT	<input type="checkbox"/> 3 RENEWAL PERMIT	<input type="checkbox"/> 5 CHANGE OF INFORMATION	<input type="checkbox"/> 7 PERMANENTLY CLOSED TANK
	<input type="checkbox"/> 2 INTERIM PERMIT	<input type="checkbox"/> 4 AMENDED PERMIT	<input type="checkbox"/> 6 TEMPORARY TANK CLOSURE	<input checked="" type="checkbox"/> 8 TANK REMOVED

FACILITY/SITE NAME WHERE TANK IS INSTALLED: _____ FARM TANK - YES NO

I. TANK DESCRIPTION COMPLETE ALL ITEMS - IF UNKNOWN - SO SPECIFY

A. OWNERS TANK ID # <u>001</u>	B. MANUFACTURED BY: <u>UNKNOWN</u>
C. YEAR INSTALLED <u>UNKNOWN</u>	D. TANK CAPACITY IN GALLONS: <u>1000</u>

II. TANK CONTENTS IF (A.1), IS MARKED, COMPLETE ITEM C. IF (A.1), IS NOT MARKED, COMPLETE ITEM D.

A. <input checked="" type="checkbox"/> 1 MOTOR VEHICLE FUEL <input type="checkbox"/> 3 CHEMICAL PRODUCT <input type="checkbox"/> 5 HAZARDOUS	<input type="checkbox"/> 2 PETROLEUM <input type="checkbox"/> 4 OIL <input type="checkbox"/> 80 EMPTY <input type="checkbox"/> 95 UNKNOWN	B. <input type="checkbox"/> 1 PRODUCT <input type="checkbox"/> 2 WASTE	C. <input type="checkbox"/> 1 UNLEADED <input checked="" type="checkbox"/> 2 LEADED <input type="checkbox"/> 3 DIESEL <input type="checkbox"/> 4 GASAHOL <input type="checkbox"/> 5 JET FUEL <input type="checkbox"/> 6 AVIATION GAS <input type="checkbox"/> 7 METHANOL <input type="checkbox"/> 99 OTHER (DESCRIBE IN ITEM D, BELOW)
D. IF NOT MOTOR VEHICLE FUEL, ENTER NAME OF HAZARDOUS SUBSTANCE STORED & C.A.S. # _____			C.A.S. #: _____

III. TANK CONSTRUCTION MARK ONE ITEM ONLY IN BOX A, B, C, & D

A. TYPE OF SYSTEM	<input type="checkbox"/> 1 DOUBLE WALLED	<input type="checkbox"/> 3 SINGLE WALLED WITH EXTERIOR LINER	<input type="checkbox"/> 95 UNKNOWN
	<input checked="" type="checkbox"/> 2 SINGLE WALLED	<input type="checkbox"/> 4 SECONDARY CONTAINMENT	<input type="checkbox"/> 99 OTHER _____
B. TANK MATERIAL	<input checked="" type="checkbox"/> 1 STEEL/IRON	<input type="checkbox"/> 2 STAINLESS STEEL	<input type="checkbox"/> 3 FIBERGLASS
	<input type="checkbox"/> 5 CONCRETE	<input type="checkbox"/> 6 POLYVINYL CHLORIDE	<input type="checkbox"/> 7 ALUMINUM
	<input type="checkbox"/> 9 BRONZE	<input type="checkbox"/> 10 GALVANIZED STEEL	<input type="checkbox"/> 95 UNKNOWN
			<input type="checkbox"/> 4 STEEL CLAD W/FIBERGLASS REINFORCED PLASTIC
			<input type="checkbox"/> 8 100% METHANOL COMPATIBLE FRP
			<input type="checkbox"/> 99 OTHER _____
C. INTERIOR LINING	<input type="checkbox"/> 1 RUBBER LINED	<input type="checkbox"/> 2 ALKYD LINING	<input type="checkbox"/> 3 EPOXY LINING
	<input type="checkbox"/> 5 GLASS LINING	<input checked="" type="checkbox"/> 6 UNLINED	<input type="checkbox"/> 4 PHENOLIC LINING
	<input type="checkbox"/> IS LINING MATERIAL COMPATIBLE WITH 100% METHANOL?	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> 95 UNKNOWN
			<input type="checkbox"/> 99 OTHER _____
D. CORROSION PROTECTION	<input type="checkbox"/> 1 POLYETHYLENE WRAP	<input type="checkbox"/> 2 TAR OR ASPHALT	<input type="checkbox"/> 3 VINYL WRAP
	<input type="checkbox"/> 5 CATHODIC PROTECTION	<input checked="" type="checkbox"/> 91 NONE	<input type="checkbox"/> 4 FIBERGLASS REINFORCED PLASTIC
			<input type="checkbox"/> 95 UNKNOWN
			<input type="checkbox"/> 99 OTHER _____

IV. PIPING INFORMATION CIRCLE A IF ABOVE GROUND, U IF UNDERGROUND, BOTH IF APPLICABLE

A. SYSTEM TYPE	<input checked="" type="radio"/> A <input checked="" type="radio"/> U 1 SUCTION	<input type="radio"/> A <input type="radio"/> U 2 PRESSURE	<input type="radio"/> A <input type="radio"/> U 3 GRAVITY	<input type="radio"/> A <input type="radio"/> U 91 NONE	<input type="radio"/> A <input type="radio"/> U 95 UNKNOWN	<input type="radio"/> A <input type="radio"/> U 99 OTHER
B. CONSTRUCTION	<input checked="" type="radio"/> A <input checked="" type="radio"/> U 1 SINGLE WALLED	<input type="radio"/> A <input type="radio"/> U 2 DOUBLE WALLED	<input type="radio"/> A <input type="radio"/> U 3 LINED TRENCH	<input type="radio"/> A <input type="radio"/> U 91 NONE	<input type="radio"/> A <input type="radio"/> U 95 UNKNOWN	<input type="radio"/> A <input type="radio"/> U 99 OTHER
C. MATERIAL	<input checked="" type="radio"/> A <input checked="" type="radio"/> U 1 STEEL/IRON	<input type="radio"/> A <input type="radio"/> U 2 STAINLESS STEEL	<input type="radio"/> A <input type="radio"/> U 3 POLYVINYL CHLORIDE (PVC)	<input type="radio"/> A <input type="radio"/> U 4 FIBERGLASS PIPE	<input type="radio"/> A <input type="radio"/> U 91 NONE	
	<input type="radio"/> A <input type="radio"/> U 5 ALUMINUM	<input type="radio"/> A <input type="radio"/> U 6 CONCRETE	<input type="radio"/> A <input type="radio"/> U 7 STEEL CLAD W/FRP	<input type="radio"/> A <input type="radio"/> U 8 100% METHANOL COMPATIBLE FRP		
	<input type="radio"/> A <input type="radio"/> U 9 GALVANIZED STEEL	<input type="radio"/> A <input type="radio"/> U 95 UNKNOWN	<input type="radio"/> A <input type="radio"/> U 99 OTHER			

V. LEAK DETECTION SYSTEM CIRCLE P FOR PRIMARY, OR S FOR SECONDARY, A PRIMARY LEAK DETECTION SYSTEM MUST BE CIRCLED.

<input type="checkbox"/> P <input type="checkbox"/> S 1 VISUAL CHECK	<input type="checkbox"/> P <input type="checkbox"/> S 2 INVENTORY RECONCILIATION	<input type="checkbox"/> P <input type="checkbox"/> S 3 VADOSE WELLS	<input type="checkbox"/> P <input type="checkbox"/> S 4 ELECTRONIC MONITOR	<input type="checkbox"/> P <input type="checkbox"/> S 5 GROUND WATER MONITORING WELLS
<input type="checkbox"/> P <input type="checkbox"/> S 6 PRECISION TESTING	<input type="checkbox"/> P <input type="checkbox"/> S 7 PRESSURE TESTING	<input checked="" type="checkbox"/> P <input type="checkbox"/> S 91 NONE	<input type="checkbox"/> P <input type="checkbox"/> S 95 UNKNOWN	<input type="checkbox"/> P <input type="checkbox"/> S 99 OTHER _____

VI. INFORMATION ON TANK PERMANENTLY CLOSED IN PLACE

1. ESTIMATED DATE LAST USED (MO/YR) <u>1982</u>	2. ESTIMATED QUANTITY OF SUBSTANCE REMAINING IN <u>UNKNOWN</u> GALLONS	3. WAS TANK FILLED WITH INERT MATERIAL? <input type="checkbox"/> YES <input type="checkbox"/> NO
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THIS FORM HAS BEEN COMPLETED UNDER PENALTY OF PERJURY, AND TO THE BEST OF MY KNOWLEDGE, IS TRUE AND CORRECT.

APPLICANT'S NAME (PRINTED & SIGNATURE) <u>K.M. Krane FOR PACIFIC TRUST</u>	DATE <u>6-5-90</u>
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LOCAL AGENCY USE ONLY

COUNTY #	JURISDICTION #	AGENCY #	FACILITY ID #	TANK ID #
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
CURRENT LOCAL AGENCY FACILITY ID #			APPROVED BY NAME	PHONE # WITH AREA CODE
PERMIT NUMBER		PERMIT APPROVAL DATE	PERMIT EXPIRATION DATE	
CHECK #	PERMIT AMOUNT	SURCHARGE AMT.	FEE CODE	RECEIPT #
				BY: _____