

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02824

August 12, 1998

ENVIRONMENTAL HEALTH SERVICES

1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
(510) 337-9335 (FAX)

Mr. Cyrus Colburn
Lincoln Property Company
330 Hatch Drive, Suite A
Foster City, CA- 94404

Ref: Use of stockpiled soil on Parcel 2 located across from 7055 to 7091 Central Avenue, Newark, CA

Dear Mr. Colburn:

I am in receipt of the report dated August 3, 1998, prepared by Erler and Kalinowsk (EKI) which includes the laboratory results of the stockpile soil samples collected at the referenced property.

In order to comply with the risk management plan, six composite samples were collected from the 750 cubic yards of stockpiled soil and analyzed for lead, PCB's and petroleum hydrocarbons in order evaluate if the stockpiled soil can be used as an "unrestricted access" soil. Based on the laboratory results of the soil samples, no PCB was detected, less than 100-PPM petroleum hydrocarbons was detected and up to 140 PPM of lead was detected. Except for lead, the contaminants were found in concentrations less than the established cleanup levels as per the risk management plan. However, although a lead concentration of 140 PPM in one composite soil sample exceeds the cleanup level of 130 PPM, the average lead concentration of 45 PPM is lower then the cleanup level.

Based on the information provided to this Department, this Department approves the use of the stockpiled soil in "unrestricted access" areas. If you have any questions, you may reach me at (510) 567-6764.

Sincerely,

Madhulla Logan
Hazardous Material Specialist

C: Michelle King, Erler and Kalinowski, Inc. 1730 Amphlett Blvd., Suite 320, San Mateo, CA - 94402

Jackie Bretschneider, City of Newark Fire Department, Newark, CA

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



202824

Alameda County
Environmental Health
1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
(510)567-6700 FAX(510)337-9335

July 9, 1996

Edgar Thrift
Lincoln Property Company
101 Lincoln Center Drive
Foster City, CA - 94404-1167

Ref: Former Redwood Lumber - 7091 Central Avenue, Newark, CA

Dear Mr. Thrift:

I am in receipt of the final document "Risk Management Plan", dated June 6, 1996, and an addendum to the Risk Management Plan, dated July 3, 1996, prepared by Erler and Kalinowski, Inc (EKI) for the referenced site. Also, a document dated May 24, 1996 was submitted by American Brass and Iron (AB&I) which includes information requested by this Department on foundry material classification, and the Federal EPA's SW-846 document, "Test Methods for Evaluating Solid Waste".

The risk management plan was submitted in response to our request letter dated, May 21, 1996 as a comprehensive approach to coordinate the proposed redevelopment of the property for commercial (including light and heavy industrial) land uses with prudent management of the contamination currently existing on the property. Also, a risk assessment, a deed restriction, and reporting procedures, were requested by this Department as part of closure requirements which have been submitted as part of the final risk management plan.

The risk management plan has been reviewed and embodies all the necessary requirements of this Department. A closure letter will be issued subsequent to the implementation of section 4.0 of the risk management plan which includes but not limited to submittal of an as-built plan to document the relocation of the foundry material on the site and the capping of the site.

If you have any questions, you may reach me at (510) 567-6764.

Sincerely,

Madhulla Logan
Hazardous Material Specialist

C: Jackie Bretschneider, City of Newark Fire Department, 37101 Newark Blvd, Newark,
CA - 94560

Ted Trenholme, Alameda County Water District, 43885 Grimmer Blvd, Fremont,
CA - 94537

Michelle King, Erler and Kalinowski, Inc., 1730 So. Amphlett Blvd, Suite 320,
San Mateo, CA - 94402

Dave Robinson, AB&I, 7825 San Leandro Street, Oakland, CA - 94621

Files/Gordon Coleman, Acting Chief, Alameda County Environmental Health Department

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#2824

Alameda County CC4580
Environmental Health Services
1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
(510)567-6700 FAX(510)337-9335

May 21, 1996

Mr. Edgar Thrift
Lincoln Property Company
101 Lincoln Centre Drive
Foster City, CA - 94404-1167

Ref: Former Redwood Lumber - 7091 Central Avenue, Newark, CA

Dear Mr. Thrift:

I am in receipt of the letter dated May 14, 1996 from Erler and Kalinowski, Inc (EKI) requesting that this Department clarify Lincoln's and AB & I's (American Brass and Iron's) obligations with regard to additional requirements that need to be fulfilled to obtain a no-further action or closure letter from this Department and the Alameda County Water District (ACWD). Given below is a list of requirements that are needed by both this Agency and the Alameda County Water District to meet the regulatory requirements for site closure:

- An acceptable risk management plan should be submitted which will include a provision to remediate the site by capping it as shown by the Figures 1 through 3 which was submitted at the meeting held on March 14, 1996. During the soil management process, adequate precautions should be taken to avoid disturbing the native soil at depths no greater than 3 feet and likewise contaminated foundry soils should not be placed in depths greater than 3 feet.
- A health and ecological based risk assessment should be performed by a qualified individual and by using accepted and peer-reviewed risk assessment methodologies. The risk assessment should consider all the necessary exposure pathways, the exposed target population and should be based on the future use of the property.
- Concentration of lead on site exceeds the hazardous waste levels and hence a deed restriction or deed notification is required.
- It is to Mr. Ted Trenholme's understanding based on his conversation with the San Francisco Regional Water Quality Control Board, that a waste discharge permit may not be required as long as the native soil is not disturbed to more than 3 feet in depth and a setback of clean soil is provided on that portion of the property alongside the flood control channel. However you should contact the SFRWQCB to confirm this.
- Provide additional information to the ACDEH regarding statistical analyses and casting sand thickness presented previously by AB&I.
- Any discolored or odorous soils found during demolition of existing buildings should be reported immediately to all the involved regulatory agencies. Based on the extent and level

of contamination identified, additional work may be required.

- Additional **deposit-refund money** will be required by this Department for the review of the risk management plan, risk assessment plan and for other oversight cost.

All the above listed information should be submitted to this Department within 60 days of receiving this letter. This is a formal request for technical information and any delays should be requested in writing. If you have any questions, you may reach me at (510) 567-6764.

Sincerely,



Madhulla Logan,
Hazardous Material Specialist

CC: **Jackie Bretschneider**, City of Newark Fire Department, 37101 Newark Boulevard, Newark, CA - 94560

Ted Trenholme, Alameda County Water District, 43885 South Grimmer Boulevard, Fremont, CA - 94537

Michelle King, Erler and Kalinowski, Inc., 1730 So. Amphlett Blvd, Suite 320, San Mateo, CA - 94402.

Gordon Coleman, Acting Chief, Alameda County Environmental Health Department

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#2824

Alameda County CC4580
Environmental Health Services
1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577

April 30, 1996

Dave Robinson
Environmental Engineering Manager
American Brass and Iron
7825 San Leandro Street,
Oakland, CA - 94621

Ref: Former Redwood Lumber, 7091 Central Avenue, Newark, CA

Dear Mr. Robinson :

I am in receipt of the documents "Soil Sampling and Analysis", dated March 13, 1996 and "Soil and Groundwater Sampling and Chemical Analysis", dated April 29, 1996. Based on the data submitted to the concerned regulatory agencies, lead is present in some areas of the site in concentrations exceeding the California TTLCs (Total Threshold Limit Concentrations) although, the 95% upper confidence limit (UCL) of the average concentrations of lead are within the California TTLC values and the EPA's Preliminary Remediation Goals (PRGs) for commercial sites. In response to your request to manage the lead contamination on-site, this Department in conjunction with the Alameda County Water District (ACWD) and the City of Newark Fire Department requires that the following information be submitted to move the site towards closure:

1. A comprehensive risk management plan that is acceptable to the regulatory agencies needs to be submitted. This risk management plan should include at a minimum the following information:
 - methods to mitigate any of the potential negative impacts posed by lead contamination on-site, like capping the site, using liners, barriers, etc.
 - strategy to address the risk posed during any earth moving activities, foundation and utility trenching, water impoundments, etc and specifically address the risk to the construction workers.
 - methods to restrict the contaminated soil to areas that are not easily accessible, like under the buildings etc.
 - include a site development map showing areas to be landscaped and mention how the public (employees, pedestrians, construction workers, utility workers etc) are going to be protected from contamination present in these areas.
2. A health and ecological based risk assessment should be performed by a qualified individual and by using accepted and peer-reviewed risk assessment methodologies. The risk assessment should consider all the necessary exposure pathways, the exposed target population and should be based on the future use of the property.
3. Concentration of lead on site exceeds the hazardous waste levels and hence a deed restriction

or deed notification may be required. Based on the results of the risk assessment, the site may have restricted future use and this needs to be specifically stated in the deed.

4. The site has been identified as having imported waste, and hence a waste discharge permit may be required by the landfill division of the San Francisco Regional Water Quality Control Board (RWQCB) to leave the contamination on-site. Contact Mr. Curtis Scott of the RWQCB at 286-0455 to get further information on their waste discharge requirements.
5. In addition to the above specified requirements, provide information on the following:
 - the summary of soil results and an explanation of the SW-846 method that was used to convey that the average soil concentrations based on a 95% UCL for lead were less than the California hazardous waste levels.
 - submit a site diagram which shows contours of site and depth of sand. This map will be used for purposes of delineating the foundry sand for the site management plan.
6. Any discolored or odorous soils found during any demolition of existing buildings should be reported to the Newark Fire Department.
7. Additional deposit-refund money may be required by this Department for the review of the risk management plan, risk assessment plan and other oversight cost.

All the above listed information should be submitted to this Department within 60 days of receiving this letter. This is a formal request for technical information and any delays should be requested in writing. If you have any questions, you may reach me at (510) 567-6764.

Sincerely,



Madhulla Logan
Hazardous Material Specialist

C: **Jackie Bretschneider**, City of Newark Fire Department, 37101 Newark Boulevard,
Newark, CA - 94560

Ted Trenholme, Alameda County Water District, 43885 South Grimmer boulevard,
Fremont, CA - 94537

Gordon Coleman, Acting Chief, Alameda County Environmental Health Department

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R02824

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

November 14, 1995

Mr. Dave Robinson
American Brass
7825 San Leandro Street
Oakland, CA - 94621

Ref: American Brass - 7091 Central Avenue, Newark, CA

Dear Mr. Robinson:

I am in receipt of the workplan for soil sampling and analysis, dated September 13, 1995 prepared by BSK and Associates for the above referenced property. The plan has been reviewed and is acceptable to this Department.

Based on the results of this preliminary investigation, additional soil or groundwater investigation may be required by this Department. Also, this Department has not received groundwater monitoring reports for the past year. Please submit this information to this Department.

As I have mentioned previously, this Department charges oversight fees through a deposit refund mechanism. The deposit refund mechanism is authorized in Alameda County Ordinance Code Section 3-140.6 and the account is charged at a hourly rate of \$90.00. Hence, please remit an amount of \$1500 payable to Alameda County Environmental Health.

If you have any questions, call me at (510) 567-6764.

Yours Sincerely,

A handwritten signature in cursive script that reads "Madhulla Logan".

Madhulla Logan
Hazardous Material Specialist

MS



Telephone Number: (415)

Certified Mailer #: P 062 127 854

January 31, 1990

Mr. Michael A. Shekey
Selman, Breitman & Burgess
Suite 2050
Two Century Plaza
2049 Century Park East
Los Angeles, California 90067-2592

Re: Copies of Selected Documents from the Redwood Lumber Site File

Dear Mr. Shekey:

Per Roseanne Hurvitz's letter of January 2, 1990 and my conversation with Ms. Hurvitz on January 19, enclosed are copies of the following documents from our file for Redwood Lumber, 7091 Central Avenue, Newark, California:

Woodward Clyde's Field Evaluation (Environmental) Assessment (of Redwood Lumber Site) dated February 23, 1989

All letters in the Redwood Lumber File with the exception of a Letter from the City of Newark to our office concerning handling of the Redwood Lumber case. The letters included are as follows:

- * June 5, 1989 letter from our office to Cabot, Cabot & Forbes;
- * July 5, 1989 letter from Cabot, Cabot & Forbes to Reginald Sandberg et al.;
- * July 5, 1989 letter from Cabot, Cabot & Forbes to Rafat A. Shahid (our office);
- * August 3, 1989 letter from Passalacqua, Mazzone & Gladden to Mr. Ireland (Cabot, Cabot & Forbes);
- * August 3, 1989 letter from Passalacqua, Mazzone & Gladden to Rafat A. Shahid (our office);
- * August 8, 1989 letter from Passalacqua, Mazzone & Gladden to Mr. Ireland (Cabot, Cabot & Forbes);
- * August 8, 1989 letter from Passalacqua, Mazzone & Gladden to Katherine Chesick (our office);

Page 2 of 2
Mr. Michael A. Shekey
Redwood Lumber Site
January 31, 1990

R02824

- * August 11, 1989 letter from Cabot, Cabot & Forbes to Rafat A. Shahid (our office); and
- * September 21, 1989 letter from our office to Mr. Ireland (Cabot, Cabot & Forbes).

You will be billed for this service at the rate of \$1.00 per page of enclosed information and at the rate of \$56.00 per hour for our time spent (see attached).

If you have any questions, please contact me at (415) 271-4320.

Sincerely,



Katherine A. Chesick
Senior Hazardous Materials Specialist

enclosures

cc w/o enclosures:

Jacquelyn Bretschneider, Newark Hazardous Materials Bureau
Jill Duerig, Alameda County Water District
Howard Hatayama, State Department of Health Services
Lester Feldman, Regional Water Quality Control Board
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Rafat A. Shahid, Alameda County Department of Environmental
Health
Files



Certified Mailer #: P 062 128 089

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

September 21, 1989

Mr. W. Thomas Ireland, Vice President,
Cabot, Cabot & Forbes
4700 Bohannon Drive, Suite 120
Menlo Park, California 94025

Re: Plan of Correction for the Redwood Lumber Company site, 7091
Central Avenue, Newark, California

Dear Mr. Ireland:

We have received and reviewed the Proposal Plan of Correction for the Redwood Lumber Company Site located at 7091 Central Avenue in Newark. This proposal was prepared by Woodward-Clyde Consultants and dated August 1989. The work proposed in this document is acceptable to us and may be conducted provided the following items are incorporated:

- 1) All borings are permitted through the Alameda County Water District (ACWD);
- 2) Site field work is scheduled in advance with our office, the ACWD, and the Newark Hazardous Materials Bureau to enable representatives from these offices to witness field activities if necessary;
- 3) Sanborn Fire Insurance Maps are reviewed as part of the proposed Task 2, Public Records Review. These maps are available at the City of Newark Planning Department, at the ACWD and from the Sanborn Map Company (Pelham, New York (914) 738-1649). Maps of the area exist for 1908, 1925, and 1925-1932. These maps show building locations, construction types, well and tank locations, etc. at the time the maps were made;
- 4) Review of records is done for possible underground tank locations. The presence of a tank is suggested by the discovery of a Chevron gas pump on the property;

Page 2 of 3
Mr. Ireland
Cabot, Cabot & Forbes
September 21, 1989

- 5) Soil samples will be collected from the stained soil in the vicinity of the former transformer; samples will also be collected from stained concrete in this area. These samples must be analyzed for polychlorinated biphenyls and petroleum hydrocarbons (including hydrocarbons in the mineral oil boiling point range);
- 6) Samples collected from barren ground will be analyzed for pH, pesticides (EPA Method 8080 at a minimum), and volatile and semi-volatile compounds, in addition to Title 22 Metals;
- 7) All analyses will be done in accordance with Title 22. For California Waste Extraction tests, **extraction must be done by the specified acid solution(s)**, not with distilled water;
- 8) Information is submitted on asbestos hazards of the degraded insulation of "the rusted gas furnace" (see page 9, Preliminary Report, Aqua Resources, Inc., 1985);
- 9) Documentation is submitted on any work done as a result of the Woodward-Clyde Consultants February 23, 1989 Memorandum. This memorandum documented site conditions. Due to the variable nature and large aerial extent of potentially hazardous materials on site, the memorandum recommended a planned, controlled program of hazardous waste removal and disposal;
- 10) The contents of Appendix G (Sample Preservation, Packaging and Shipment) will be submitted. These were missing from our proposal copy;
- 11) The final report will contain, in an organized manner, the following site history information requested in item 1) of our June 5, 1989 letter:

A complete site ownership and use history. Include the following information for all site uses:

- * the materials, chemicals and processes used;
- * the wastes produced;
- * the waste handling practices;
- * any information on underground tanks on the property; and
- * to scale diagrams showing process locations, buildings, railroad tracks, chemical and waste storage areas, maintenance areas, equipment pits (including any furnace and boiler locations), sumps and any above and below ground storage tanks.

Page 3 of 3
Mr. Ireland
Cabot, Cabot & Forbes
September 21, 1989

- 12) The final report will contain, in an organized manner, a summary of samples collected to date (location, type, depth, type of analyses done, analytical results) and a map showing all sampling locations.

We have not commented on the sections of the proposal which describe monitoring well installations and ground water sampling because we will oversee only soil remediation at this site. The ground water investigation and surface water quality concerns will be handled by the ACWD and the Regional Water Quality Control Board (RWQCB). These agencies must be contacted for their requirements for and comments on the proposed ground water investigation.

Should you wish to meet to discuss this site, or should you have any questions, please contact Katherine Chesick, Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,



Rafat A. Shahid, Chief,
Hazardous Materials Division

RAS:kac

cc: Alan Lattanner, Woodward-Clyde Consultants
Jacquelyn Bretschneider, Newark Hazardous Materials Bureau
Jill Duerig, Alameda County Water District
Howard Hatayama, State Department of Health Services
Lester Feldman, Regional Water Quality Control Board
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Katherine Chesick, Alameda County Hazardous Materials Division
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R02824

Certified Mailer #:P 833 981 429

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

June 5, 1989

Mr. A. John Low
Cabot, Cabot & Forbes
Two Embarcadero Plaza
2200 Geng Road
Suite 210
Palo Alto, California 94303

Re: Contamination at the Redwood Lumber Company site, 7091 Central Avenue, Newark, California

Dear Mr. Low:

This case has been referred to us by the City of Newark Hazardous Materials Bureau for oversight of soil investigation and remediation. We have received and reviewed copies of the Woodward-Clyde Consultants reports dated July 29, 1987 (Final Report, Environmental Site Evaluation, Redwood Lumber Site) and August 20, 1987 (Interim Report, Soil and Groundwater Sampling, Redwood Lumber Site). These reports indicate the site has hosted a lumber mill (the Redwood Lumber Company), a plastic pipe extruding operation, an auto-wrecking business, and possibly a foundry. The site was also used to store scrap metal and dispose of foundry waste. The reports document the existence of oil puddles, a broken transformer, and hazardous waste contaminated soil at the site.

Because soil contamination has been found on site, you must submit a plan of correction per the California Code of Regulations Title 22 Section 66328. The plan must include the following:

- 1) A complete site ownership and use history. Include the following information for all site uses:
 - * the materials, chemicals and processes used;
 - * the wastes produced;
 - * the waste handling practices;
 - * any information on underground tanks on the property; and
 - * to scale diagrams showing process locations, buildings, railroad tracks, chemical and waste storage areas, maintenance areas, equipment pits (including any furnace and boiler locations), sumps and any above and below ground storage tanks.

Page 2 of 3
Mr. Low
Cabot, Cabot & Forbes
June 5, 1989

Be sure to include information on the activities of American Brass and Foundry (reference Figure 2, Woodward-Clyde Consultants, August 20, 1987 report) and whether any chemical treatment of wood was ever done on site.

- 2) Complete copies of all environmental reports prepared for the property (including the report "Site Investigation: Redwood Lumber Co." prepared by Aqua Resources, Inc. for Trinity Development and the reports for any work performed per the recommendations of the August 20, 1987 Woodward-Clyde Consultants report). These reports shall include copies of all analytical results.
- 3) Complete analytical results for the August 20, 1987 Woodward-Clyde Report, including the asbestos analyses. Only a summary sheet of the results was included with the report.
- 4) A proposal to identify (show on figures) and sample barren and stained areas not already sampled.
- 5) A proposal for the determination of the vertical and lateral extent of contamination identified in the August 20, 1987 Woodward-Clyde Consultants report. Contamination found at sampling areas 9 (waste oil puddle with up to 210,000 ppm oil and grease), 10 (soil beneath pallet on which battery casings were stored), 14 (soil from transformer base contaminated with up to 875 ppm polychlorinated biphenyls) and 16 (surface soil with up to 52,000 ppm total petroleum hydrocarbons) must be addressed at a minimum. Lead contamination found at sampling areas 3 and 10 must be assessed for solubility and compared to soluble threshold limit concentration (STLC) levels.
- 6) The analytical methods and State Certified Laboratory to be used for sample analysis. The analytical methods shall be chosen based on information assembled for item 1) above and based on information contained within Woodward-Clyde Consultants' August 20, 1987 report. Based on the site history known at this time, total petroleum hydrocarbons (gas and diesel boiling range), oil and grease, heavy metals (lead, copper, zinc, nickel, chromium), caustics, polychlorinated biphenyls, solvents (including acetone) and possibly wood treatment chemicals such as arsenic and phenols are of concern.
- 7) A proposal for disposal of the broken transformer, contaminated soil, and any oils, fuels and sludges remaining in trenches and containers on site.
- 8) A deposit of \$800, payable to Alameda County, to cover our time on this project.

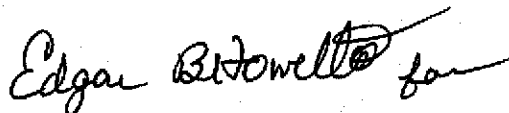
Page 3 of 3
Mr. Low
Cabot, Cabot & Forbes
June 5, 1989

This plan shall be submitted within 45 days of the date of this letter.

We wish to inform you that the soil contamination on the Redwood Lumber property evidences illegal disposal of hazardous waste. According to the California Health and Safety Code Section 25189.5, this violation is punishable by fines of up to \$100,00 per day. We also wish to draw your attention to Section 25191 of the Code which states that persons concealing records relating to the disposal or handling of hazardous waste or making false statements in records or reports used for the purpose of compliance may be fined up to \$25,000 per day per violation.

We look forward to working with you in investigating and remediating this site. Please feel free to contact Katherine Chesick, Hazardous Materials Specialist, at (415) 271-4320 if you have any questions.

Sincerely,



Rafat A. Shahid, Chief,
Hazardous Materials Division

RAS:kac

cc: Mr. W. Thomas Ireland, Cabot, Cabot & Forbes
Jacquelyn Bretschneider, Newark Hazardous Materials Bureau
Jill Duerig, Alameda County Water District
Howard Hatayama, State Department of Health Services
Lester Feldman, Regional Water Quality Control Board
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