



Alameda County

AUG 24 2011

Environmental Health

August 22, 2011**NOTICE TO REGULATORS –HERTZ SERVICE FACILITY – NON EMERGENCY POTENTIAL
RELEASE OF WASTEWATER**

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United States Environmental Protection Agency
Region 9
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San Francisco, CA 94105

RE: Oakland Metropolitan International Airport
Hertz Service Facility
8000 Earhart Road
Oakland, California 94621
Report of Potential Non-Emergency Release - July 21, 2011

Dear Sir or Madam:

The Port of Oakland ("Port") hereby provides notice of the discovery of an unauthorized release and discharge of wastewater which occurred on July 21, 2011, on Port property leased to The Hertz Corporation ("Hertz") and operated as the Hertz Service Facility, located at 8000 Earhart Road, Oakland, California ("Site") at the Oakland International Airport ("Airport").

The Port does not know whether this release exceeded regulatory thresholds for emergency reporting/notification established by the California Emergency Management Agency ("EMA") or the National Response Center ("NRC") – or whether reporting is necessarily required under other applicable laws. The Port observed that wastewater was released from a Baker Tank used by Hertz. The Port believes that the Baker Tank contained primarily water with some oil or fuel residue from an oil-water separator and/or from Hertz's car wash operations. Since the Port does not know how much oil or fuel was in the water, the Port does not know whether the regulatory thresholds were exceeded. Nonetheless, as a public service, the Port has elected to report this release on a voluntary basis to appropriate federal, state, and local environmental regulatory agencies.

The Port is providing the EMA and the NRC with a copy of this letter by mail rather than by telephone or by on-line forms, because based upon the limited information that the Port has on the release, and the uncertainty as to whether a reportable quantity of hazardous substances was released, the Port does not consider the release to be urgent or a non-emergency release. Therefore, the Port has not used the on-line forms provided by EMA and the NRC or the Department of Toxic Substances Control (DTSC) for reporting non-emergency releases under California Health and Safety Code Section 25359.4.

Location of Release

On July 21, 2011 ("July 21 Incident"), the Port's environmental consultant, AECOM observed that Hertz had discharged potentially-contaminated wastewater from a Baker tank located at the Site. The Port believes this discharge contained either wastewater from the oil-water separator or the car wash wastewater. The discharge occurred directly onto the adjacent asphalt pavement,

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entered a slotted storm drain, eventually overflowing into the vegetated swale on the Site. The oil-water separator for the car wash had been shut down at the direction of the East Bay Municipal Utility District ("EBMUD") on June 26, 2011 after the discovery of a discharge of gasoline into the sanitary sewer system operated by EBMUD caused by a gasoline fuel release into the oil-water separator ("Fuel Release Incident"). EBMUD issued a Notice of Violation on July 5, 2011 related to the Fuel Release Incident. The July 21 Incident may be related to the earlier Fuel Release Incident since the wastewater may have been from water from the oil-water separator, although there was no visible fuel or sheen observed in the discharged wastewater. The Port requested that Hertz provide notice to the appropriate environmental regulatory agencies. Hertz sent an Underground Storage Tank Unauthorized Release (Leak)/Contamination Site Report to the Oakland Fire Department dated July 8, 2011, copying various environmental regulatory agencies. A copy of Hertz's prior notice is attached.

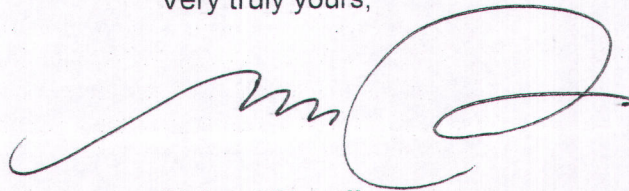
Nature and Source of the Release

The precise contents of the Baker tank, whether wastewater from the oil-water separator or from the car wash, or a combination of both, are unknown to the Port. The Port has sent a letter of complaint to Hertz, but has not received a comprehensive response. The Port has also demanded that Hertz assume full responsibility for responding to both the Fuel Release Incident and the July 21 Incident.

Conclusion

If you would like additional information about this incident at the Hertz Service Facility, please contact Mr. Dale Klettke, Port Associate Environmental Scientist, at (510)627-1118 or by email at dklettke@portoakland.com.

Very truly yours,



Richard Sinkoff
Director of Environmental Programs & Planning
Port of Oakland

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