

From: Debra Horen

Sent: Tuesday, July 11, 2017 11:55 PM

To: Baylands

Cc: Lall, Prem; Miller, Anja; Ebel, Barbara; Anderson, Greg; Johnson, Clara; Salmon, Michelle; Horen, Debra; Mackin, Coleen; Attard, Tony; Miller Ray AT Yahoo; Grossman, Beth; Bouscal, Paul; Diaz, Joel

Subject: Baylands toxins documentation

Hi Ingrid,

Please disseminate my email and the following documentation to the City Council and any Brisbane City Staff you think are appropriate.

Dear Mayor and Council Members,

I am submitting three documents that I believe to be material in analyzing the hazardous substances and remediation plan for the Baylands.

Under the Freedom Of Information Act, I requested documentation about former Superfund sites on the Baylands - sites that were on the EPA CERCLA during the creation of the National Priority Superfund List. The story of how the Brisbane CERCLA National EPA sites were handed off to to the DTSC (California EPA) is below.

- The Southern Pacific Railway was given a Remedial Action Order in 1988 due to human health hazards and the severity of the toxicity at the site. The EPA was calling for fencing off the area since it was so toxic. (Please refer to the document called Remedial Action Order 1988.)
- In 1989, the EPA handed this site to DTSC to manage, because UPC, who purchased this land from SP, committed to the site clean-up as part of the purchase agreement and assured the EPA that they had the sufficient resources to clean up the site. (Refer to the document named Southern Pacific Site Screening Assessment). This document calls out the specific hazardous substances known at the time to be on this site. Please skim the document to note the classification of how hazardous the known substances were - many of these hazardous substances are at the highest level. There is also a chronology at the back that shows some pertinent history at the site.
- The third document, called the Stauffer Preliminary Assessment 1987, shows that the Stauffer Site in Brisbane was removed from CERCLA and not put on the National Priority List because "It appears that this site is an unlikely candidate for inclusion on the CERCLA National Priorities List **due to the lack of a target population.**" (See section 1C) *There were no plans at the time of this decision to have anyone living near this site. Since the possibility of people living near this site has changed, so too should the conclusions and recommendations. **This important issue should be called out in the FEIR.***

I am sending these documents to you for 3 reasons:

1. This information was not included in the FEIR. I submit that **the FEIR is inadequate** since it omitted or did not adequately address these material facts.
2. The City of Brisbane is considering hiring Dr. Lee for vital second opinion. The Environmental expert who has been consulting for us at the public hearings has not addressed important questions that have been brought up at the hearings. She stated several times that she has no knowledge of gov't regulatory agencies failing at clean-ups. DTSC signed off at Bayview Hunters Point recently and gave the green light for housing to be built on land that still had dangerous levels of radiation. There is a Stauffer Site in Richmond California, a former Superfund site that was handed off to the Water Quality Board for oversight. More information can be found at <http://richmondconfidential.org/2009/11/09/years-later-chemical-company-lot-still-a-toxic-stew/> These are significant gov't regulatory agency failures in our Bay Area backyard. Brisbane definitely needs a second opinion from an environmental expert who does not turn a blind eye to important questions that our citizens have asked after years of research. Dr Lee has proven trustworthy. Please have Dr. Lee give his opinion on these documents and former Stauffer sites cross this country - so many of them Superfund sites with life endangering toxins. We don't even know what toxins lie under our former Stauffer site.
3. And finally, the citizens of Brisbane are entrusting the City Council with complete and thorough due diligence that will result in decisions that will not put human health or lives at risk. Never has a decision on the Brisbane City Council carried so much responsibility and liability. Please take a look at these documents. This is not a time to rush to decision because a campaign for City Council is near. The City Council Baylands hearings this spring seemed like a horse race, as does the schedule for deliberations. When you read these documents and you read about what happened at the Stauffer Site in Richmond, or the Hunters Point site, understand that your seat at the table with the regulatory agencies does not get you any less parts per million of allowable toxins or any more safety than the agencies provide. Please don't be lulled into a false complacency. Just like the saying when you are buying a house: Buyer Beware. The lesson is always to read all of the fine print and do all of your inspections. The outcomes of your decisions fall squarely on your shoulders

These documents are just a tip of the iceberg. The question about housing is not do we want housing or not. The question is, is housing, beyond a shadow of doubt, safe? There is no margin for error when health and lives are at stake.

Thank you for your consideration of these matters and, again, thank you for your service.
Deb Horen

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STATE OF CALIFORNIA
HEALTH AND WELFARE AGENCY
DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION

In the Matter of:) Docket #HSA 88/89 - 017
SOUTHERN PACIFIC TRANSPORTATION)
COMPANY) REMEDIAL ACTION ORDER
Geneva Avenue and Bayshore) Health and Safety Code,
Boulevard) Sections 205, 25355.5(a)
Brisbane, CA 94005) (1)(B), and 25355.5(a)(1)(C)

I. INTRODUCTION

1.1. Parties. The State Department of Health Services ("Department") issues this Remedial Action Order ("Order") to Southern Pacific Transportation Company ("Respondent"). Southern Pacific Transportation Company is a corporation incorporated in the State of Delaware doing business in California.

1.2. Site. The Site which is the subject of this Order is located at Geneva Avenue and Bayshore Boulevard in Brisbane, California. The Site is about 180 acres in size and is bounded by Bayshore Boulevard on the west, Sunnydale Avenue on the north, Industrial Way on the southwest and Tunnel Avenue on the east. A map of the Site is attached as Exhibit 1.

1 Site. The Site also overlays a discharge area and a potentially
2 usable ground water source. Contaminants from the Site may
3 migrate offsite via surface water runoff, wind dispersion, and
4 ground water transport. This could result in human and animal
5 exposure from direct contact with or ingestion of contaminated
6 soil or water. Prior to execution of this Order contamination
7 at the Site has been the subject of extensive studies and data
8 collection by Respondent.

9 2.2. Nature and Extent of Contamination. Soil and shallow
10 ground water at the Site are contaminated with a variety of
11 hazardous substances, including arsenic, barium, chromium,
12 copper, lead, zinc, oil, benzene, trichloroethane (TCA),
13 trichloroethylene (TCE), dichloroethylene (DCE), and vinyl
14 chloride. Arsenic, benzene and vinyl chloride are known human
15 carcinogens. Lead is known human teratogen. TCA, TCE and DCE
16 are central nervous system depressants and skin hazards.

17 In December 1981 an investigation by Respondent revealed
18 several areas of soil contaminated with oil and heavy metals.
19 Contamination of the upper water bearing zone with oil, metals,
20 and chlorinated volatile organic compounds was also found. In
21 wells 10, 11, 17, 24, and 25 floating oil was observed. Some
22 key findings are summarized below:

23 Table 1: Concentrations of heavy metals in soil (ppm).

24	<u>Boring</u>	<u>Depth</u>	<u>Copper</u>	<u>Lead</u>	<u>Zinc</u>	<u>Cadmium</u>
25	HLA19	8'	2680	5230	4160	753
	HLA19	11'	5230	1670	1020	286
26	HLA20	10'	9600	3100	4900	1300

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1 Table 2: Concentrations of heavy metals in unfiltered
2 shallow groundwater (ppm).

3 <u>Well #</u>	<u>Arsenic</u>	<u>Chromium</u>	<u>Copper</u>	<u>Lead</u>
4 HLA7	0.12	0.15	0.8	2.0

5 Table 3: Concentrations of solvents in shallow ground
6 water (ppb).

7 <u>Well #</u>	<u>1,1-trans-DCE</u>	<u>1,1-DCE</u>	<u>TCE</u>	<u>Vinyl Chloride</u>
8 HLA1	2770	75	10,000	460

9 2.3. Pathways of Exposure. The Site in its present state
10 represents an actual or potential threat to public health and
11 the environment, as described below:

12 (a) there are temporary work crew overnight facilities on
13 the Site and trespassers have been seen on the Site;

14 (b) the Site is located in Visitacion Valley, a basin
15 tributary to the San Francisco Bay. The Bay is located
16 approximately 2000 feet east of the Site. The Bay is used
17 for recreational and commercial fishing and water
18 recreation;

19 (c) the Site overlays a potentially usable ground water
20 source;

21 (d) the hazardous substances addressed in this Order have
22 been found in on-site soils and shallow ground water.
23 Contaminants could further migrate to ground water aquifers
24 which may be used to supply drinking water to area residents;

25 (e) surface soil contaminants may be dispersed via surface
26 water runoff and wind. Exposure of humans to contaminated
27 soil and particulates via direct contact, inhalation or
ingestion may occur.

1 (f) exposure of wildlife of the Bay may occur as a result
2 of surface runoff or wind dispersal of contaminants; and
3 (g) exposure of wildlife of the Bay may occur as a result
4 of horizontal migration of contaminated groundwater into
5 the Bay.

6 2.4. Department Action. The Site has been placed by the
7 Department, pursuant to Section 25356 of the Health and Safety
8 Code, on the list of hazardous substances release site subject
9 to Chapter 6.8 of Division 20 of the Health and Safety Code, for
10 priority remedial action.

11 III. ORDER

12 3. Based on the foregoing FINDINGS AND DETERMINATIONS, IT
13 IS HEREBY ORDERED THAT Respondent conduct the following response
14 activities in the manner specified herein and in accordance with
15 a schedule specified by the Department as follows:

16 3.1. Groundwater Monitoring Program. Within 30 days of
17 the effective date of this Order, Respondent shall submit to the
18 Department for review and approval a ground water monitoring
19 program. The objectives of the monitoring program are to
20 monitor the migration of contaminants in the ground water and to
21 forewarn of any threat to public health and the environment from
22 contamination emanating from the Site. The program will be
23 incorporated into this Order by reference.

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1 3.2. Remedial Investigation Data Study Report. Within 120
2 days of the effective date of this Order, Respondent shall
3 submit to the Department for review and approval a Remedial
4 Investigation (RI) Data Study Report. The objectives of the RI
5 Data Study Report are to determine the nature and full extent of
6 contamination of air, soil, surface water and ground water at
7 the Site and contamination from the Site affecting adjacent
8 areas, and to identify all existing and potential migration
9 pathways, including the direction, rate and dispersion of
10 contaminant migration. The RI Data Study Report shall describe
11 or include the following items:

12 (a) site characteristics with map;

13 (b) waste characteristics including:

14 1) a list of all hazardous wastes and hazardous
15 substances which were disposed, discharged, spilled,
16 treated, stored, transferred, transported, handled or
17 used at the site, including a description of their
18 estimated volumes, concentrations and characteristics;

19 2) a description of all manufacturing processes which
20 are or were related to each hazardous substance,
21 material, or waste, or which produced any hazardous
22 waste; and

23 3) past disposal practices;

24 (c) existing data, including a summary of all air, soil,
25 surface water, and groundwater data that has been generated
26 and the QA/QC procedures which were followed;

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1 (d) past data which Respondent believes was generated in
2 accordance with EPA QA/QC requirements (EPA's Guidance
3 Document QAMS-005 dated December 1980) shall be validated.
4 If this validation cannot be documented, a representative
5 number of samples shall be collected and analyzed to verify
6 those past results which are to be used as a basis for
7 remedial action decisions at the Site.

8 (e) previous remedial response actions;

9 (f) based on currently available data, a Preliminary Public
10 Health and Environmental Evaluation (PPHEE) to identify
11 data gaps. The PPHEE shall be included to describe how the
12 magnitude and probability of actual or potential harm to
13 public health or welfare or the environment by the
14 threatened or actual release of a hazardous substance or
15 hazardous waste will be determined. The PPHEE shall
16 identify and characterize the following items:

- 17 1) hazardous substances and/or hazardous wastes
18 present in all relevant environmental media (e.g., air,
19 water, soil, sediment, biota;
- 20 2) environmental fate and transport mechanisms within
21 specified environmental media;
- 22 3) intrinsic toxicological properties and relevant
23 human health standards and criteria for hazardous
24 substances and hazardous wastes which are present at
25 the Site;
- 26 4) exposure pathways and extent of expected or
27 potential exposure;

- 1 5) population at risk; and
- 2 6) extent of expected harm and the likelihood of such
- 3 harm occurring;
- 4 (g) recommendations of additional work needed to eliminate
- 5 data gaps, with supplemental remedial investigation
- 6 sampling plan outlines;
- 7 (h) nature and extent of the problem, including a summary
- 8 of the actual and potential on-site and off-site health and
- 9 environmental effects;
- 10 (i) identification of general response actions.

11 3.2.1. Supplemental RI Sampling Plan. If additional work
12 is recommended to eliminate data gaps identified in the RI Data
13 Study Report or if additional sampling is required to validate
14 past data, within 30 days of the effective date of approval from
15 the Department of the RI Data Study Report Respondent shall
16 submit a Supplemental RI Sampling Plan to the Department for
17 review and approval. The Supplemental RI Sampling Plan shall
18 address and including, at a minimum, the following elements:

- 19 (a) Sampling
- 20 (b) Quality Assurance/Quality Control;
- 21 (c) Data Management;
- 22 (d) Health and Safety;
- 23 (e) PPHEE; and
- 24 (f) Schedule.

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1 3.2.1.1. Sampling. A Sampling section shall describe the
2 activities which will be undertaken, if necessary, to eliminate
3 data gaps and to complete a profile of on-site and off-site air,
4 soil, surface water, and groundwater contamination attributable
5 to operations and activities at the Site. The section shall be
6 prepared in accordance with "Preparation of a U.S. EPA Region 9
7 Sample Plan", and shall, at a minimum, describe or include the
8 following items:

- 9 (a) investigation objectives;
10 (b) site background;
11 (c) a summary of existing air, soil, groundwater, and
12 surface water data, including the rationale for locations
13 and types of analyses previous conducted;
14 (d) chemical parameters of interest;
15 (e) sample types;
16 (f) map of locations to be sampled, if any;
17 (g) sample locations and frequency, if any;
18 (h) engineering specifications for all sampling
19 installations, if any, such as groundwater monitoring
20 wells, soil borings, and piezometers;
21 (i) analytical procedures;
22 (j) provisions for gaining access to and obtaining samples
23 from adjacent properties, where appropriate; and
24 (k) operational plan.

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1 3.2.1.2. Quality Assurance/Quality Control. If samples are
2 required, a Quality Assurance/Quality Control (QA/QC) section
3 shall describe the procedures for collection, preservation, and
4 transport of samples; the calibration and maintenance of
5 instruments; and the processing, verification, storage and
6 reporting of the data. The section shall be prepared in
7 accordance with EPA Guidance Document QAMS-005 and shall
8 specifically describe:

- 9 (a) sample identification procedures;
10 (b) sample preservation procedures;
11 (c) chain-of-custody procedures;
12 (d) EPA-approved analytical methods which may be used; and
13 (e) the certified laboratory or laboratories which will
14 perform the analyses.

15 3.2.1.3. Data Management. A Data Management section shall
16 be prepared which describes how all technical data will be
17 managed and preserved in accordance with paragraph 6.17.

18 3.2.1.4. Health and Safety. A Health and Safety section
19 shall describe the specific personnel, procedures and equipment
20 which shall be used during field activities to protect the
21 health and safety of the workers at the Site, authorized
22 representatives of the Department, and the general public from
23 exposure to hazardous wastes or hazardous substances. The
24 section shall be prepared in accordance with "Hazardous Waste
25 Operations and Emergency Response", 29 CFR Part 1910.120, and
26 DHS "Site Safety Plan Outline for Site Assessment of Site
27 Mitigation Projects (1987)."

1 3.2.1.5. PPHEE. A separate section of the Supplemental RI
2 Sampling Plan shall specifically set forth in what ways the
3 PPHEE, called for in Section 3.2(e) above, shall be augmented so
4 as to incorporate the additional data collected.

5 3.2.1.6. Schedule. A Schedule shall be prepared which
6 provides the time frames and dates of completion for each
7 activity conducted under the Supplemental RI Sampling Plan.

8 3.2.2. Supplemental RI Data Study Report. If a
9 Supplemental RI Sampling Plan is needed and implemented as set
10 forth above, Respondent shall submit a Supplemental RI Data Study
11 Report on the results within 60 days following completion of the
12 final activity described in the schedule in paragraph 3.2.1.6.
13 The Supplemental Report shall set forth in what ways, if any,
14 conclusions in the RI Data Study Report are modified as a result
15 of implementation of the Supplemental RI Sampling Plan.

16 3.3. Community Relations Plan. Within 60 days of the
17 effective date of this Order, a Community Relations Plan shall
18 be prepared as a stand-alone document. It shall describe how
19 the public and the adjoining community will be kept informed of
20 the activities conducted at the Site under this Order. The
21 Community Relations Plan shall be prepared in accordance with
22 Health and Safety Code Sections 25356.1(d) and 25358.7 and the
23 following guidance document: EPA "Community Relations in
24 Superfund: A Handbook" (Draft, October 1987).

25 3.4. Feasibility Study (FS) Workplan Submission.
26 Within 60 calendar days of the effective date of the later of
27 approval from the Department of the RI Data Study Report or of
any Supplemental RI Data Study Report, Respondent shall submit

1 to the Department for review and approval an FS Workplan and
2 Schedule which addresses all the activities necessary to conduct
3 a complete Feasibility Study of the Site and any off-site areas
4 where there is a release or threatened release of hazardous
5 substances from the Site. The FS Workplan shall be developed
6 and the activities under it and the Order shall be conducted in
7 accordance with the following laws, regulations, and lawful
8 orders, to the extent they are applicable:

9 (a) California Health and Safety Code.

10 (b) California Administrative Code, Title 22.

11 (c) Comprehensive Environmental Response, Compensation and
12 Liability Act of 1980 as amended.

13 (d) National Oil and Hazardous Substances Pollution
14 Contingency Plan, 40 Code of Federal Regulations (CFR),
15 Part 300.

16 (e) EPA's "Guidance on Feasibility Studies Under CERCLA,"
17 (June, 1985).

18 (f) The Department's document, "The California Site
19 Mitigations Decision Tree Manual" (May 1986).

20 (g) Division 7 of the California Water Code and lawful
21 orders of the Regional Water Quality Control Board to the
22 extent they are applicable.

23 3.5. FS Objectives. The objectives of the FS are as
24 follows:

25 (a) Determine the magnitude and probability of actual or
26 potential harm to public health or welfare or to the
27 environment by the threatened or actual release of
hazardous substances or hazardous waste at the Site;

1 (b) Identify and evaluate appropriate remedial actions to
2 prevent or minimize future releases and mitigate any
3 releases which have already occurred; and

4 (c) Collect and evaluate the information necessary to
5 prepare a Remedial Action Plan in accordance with the
6 requirements of Health and Safety Code Section 25356.1.

7 3.6. FS Workplan Contents. The FS Workplan shall
8 address and include, at a minimum, each of the following
9 elements:

- 10 (a) Project Management
- 11 (b) Feasibility Study Performance
- 12 (c) Schedule

13 3.6.1. Project Management. A Project Management section
14 of the FS Workplan shall describe how the FS will be managed by
15 Respondent and its contractors, subcontractors, and consultants.
16 It shall include an organization chart with the names and titles
17 of key personnel and a description of their individual
18 responsibilities.

19 3.6.2. Feasibility Study Performance. A Feasibility
20 Study Performance section of the FS Workplan shall describe how
21 the Feasibility Study will be performed. The objective of the
22 Feasibility Study is to identify a remedial action or set of
23 remedial actions which will permanently prevent or minimize the
24 release of hazardous substances or contaminants from the Site so
25 that they do not migrate or cause substantial danger to present
26 or future public health and welfare of the environment. This
27 objective shall be accomplished through the identification,
development, and evaluation of remedial action alternatives with

1 respect to technical, public health, environmental,
2 institutional, and cost considerations. The Feasibility Study
3 Performance section shall include, at a minimum, the following
4 items:

5 (a) A summary of the existing and potential hazards for
6 which corrective action may be required;

7 (b) A description of the alternative remedial actions which
8 will be evaluated;

9 (c) A list of the technologies which will be screened for
10 each alternative remedial action described in (b) above;

11 (d) A description of the public health, environmental, and
12 cost factors and criteria which will be considered in
13 screening and analyzing each alternative remedial action
14 technology, including, but not limited to, effectiveness,
15 reliability, timeliness of implementation, unit cost,
16 availability, operation and maintenance costs, and
17 conformity with applicable laws and regulations.

18 3.6.3. Schedule. A Schedule shall be prepared which
19 provides the time frames and dates of completion for each
20 activity conducted under the FS Workplan and for submission of
21 the Feasibility Study Report.

22 3.7. FS Workplan Implementation. Respondent shall
23 implement the FS Workplan as approved by the Department in
24 accordance with the approved schedule.

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1 3.8. Feasibility Study Report. The Feasibility Study
2 Report shall be submitted to the Department for review and
3 approval in accordance with the approved FS Workplan Schedule.
4 The Feasibility Study Report shall summarize the results of the
5 Feasibility Study including presentation and interpretation of
6 all data and information generated and/or compiled during the
7 Feasibility Study. The Feasibility Study shall address the
8 following subjects relating to the Site:

9 a. Description of Current Situation

- 10 1. Site Background Information
11 2. Nature and Extent of Release
12 3. Objective of Remedial Action(s)

13 b. Description of Remedial Action Technologies

- 14 1. Pilot Studies
15 2. Bench Tests
16 c. Screening of Remedial Action Technologies
17 1. Technical Criteria
18 2. Remedial Action Alternatives Developed
19 3. Environmental and Public Health Criteria
20 4. Other Screening Criteria

21 5. Cost Criteria

22 d. Analysis of Remedial Action Alternatives

- 23 1. Technical Feasibility
24 2. Environmental Evaluation
25 3. Institutional Requirements
26 4. Public Health Evaluation
27 5. Cost Analysis

e. Recommended Remedial Action

1 IV. REMEDIAL ACTION PLAN

2 4.1. Draft Remedial Action Plan. Within 60 calendar
3 days after the effective date of Department approval of the
4 Feasibility Study Report, Respondent shall prepare and submit to
5 the Department for review and approval a draft Remedial Action
6 Plan (RAP) which is based on the RI Data Study Report together
7 with any supplement and the Feasibility Study Report. The RAP
8 shall set forth in detail appropriate steps to remedy air, soil,
9 surface water, and ground water contamination at the Site and
10 adjacent properties due to contamination emanating from the
11 site. The RAP shall satisfy the standards and requirements set
12 forth in California Health and Safety Code Section 25356.1, and
13 shall be consistent with the California Water Code. In
14 addition, the RAP shall contain a schedule for implementation of
15 all proposed removal and remedial actions. Upon approval of the
16 draft RAP by the Department, the plan shall be circulated for
17 public comment for at least 30 days.

18 4.2. Final Remedial Action Plan. Within 60 days of
19 completion of the public comment period, the draft RAP shall be
20 revised, as appropriate, in consideration of public comment as
21 determined by the Department. Upon approval of the revised Plan
22 by the Department, the Plan shall be considered the Final RAP.

23 4.3. Remedial Design. Within 180 days after the
24 effective date of Department approval of the Final RAP in
25 accordance with California Health and Safety Code Section
26 25356.1, Respondent shall submit to the Department a detailed
27 Remedial Design and Implementation Plan (RDIP) containing
technical and operational plans and engineering designs for

1 implementation of the approved remedial or removal action
2 alternative(s), and a schedule for implementing the construction
3 phase. The RDIP shall also include post remedial sampling and
4 monitoring procedures for air, soil, surface water and ground
5 water, an operation and maintenance manual, and shall cover all
6 of the subjects described in paragraphs 3.2.1.1 (Sampling),
7 3.2.1.2 (QA/QC), 3.2.1.3 (Data Management), 3.2.1.4 (Health and
8 Safety), and 3.3 (Community Relations) as they relate to the
9 removal and remedial activities. Submission of a detailed RDIP
10 shall not be deemed to be a waiver of any right of Respondent to
11 judicial review and decision under Health and Safety Code
12 Section 25356.1 or otherwise or any statutory rights to
13 arbitration as to costs.

14 4.4. Implementation of Final Remedial Action Plan.
15 Upon Department approval of the RDIP and schedule, Respondent
16 shall implement the Final RAP as approved in accordance with the
17 approved RDIP and schedule, subject to and without waiver of any
18 right of Respondent to judicial review and decision under
19 Section 25356.1 of the Health and Safety Code or otherwise and
20 any statutory right to arbitration as to costs. Prior to
21 beginning any implementation work, Respondent shall provide the
22 Department with a description of the nature and design of the
23 construction equipment to be employed, a site specific hazardous
24 waste transporter plan (if necessary), and the identity of any
25 contractors, transporters, and other persons conducting the
26 removal and remedial activities for Respondent.

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1 4.4.1. Operation and Maintenance. Respondent shall be
2 responsible for all operation and maintenance requirements in
3 accordance with the Final RAP and RDIP.

4 4.4.2. Modifications to RAP and RDIP. If during the
5 implementation of the Final RAP and RDIP, the Department
6 determines that the implementation of the RAP and RDIP must be
7 modified in order to protect public health and safety or the
8 environment, the Department may take the following actions:

9 (a) Request that Respondent modify the implementation of
10 the RAP and the RDIP. Within a time period specified by
11 the Department, Respondent and the Department shall meet
12 and discuss the recommended modification and, upon
13 agreement, Respondent shall modify the implementation of
14 the RAP and RDIP.

15 (b) In the event that Respondent and the Department are
16 unable to reach an agreement on the modification of the
17 implementation of the RAP and RDIP, the Department may
18 modify the implementation as deemed necessary by the
19 Department to protect public health and safety.

20 4.4.3. Discontinuation of Remedial Technology. Any
21 remedial technology employed in implementation of the final RAP
22 shall be left in place and operated by Respondent until and
23 except to the extent that the Department authorizes Respondent
24 in writing to discontinue, move or modify some or all of the
25 remedial technology because Respondent has met the criteria
26 specified in the Final RAP for its discontinuance or because the
27 modifications would better achieve the goals of the Final RAP.

1 4.5. Project Coordinator. Within five calendar days of
2 the effective date of the Order, Respondent shall submit to the
3 Department in writing, the name and address of a Project
4 Coordinator whose responsibilities will be to receive all
5 notices, comments, approvals, and other communications from the
6 Department to Respondent. Respondent may, in its discretion,
7 change the Project Coordinator, in which case Respondent shall
8 submit to the Department the name and address of the new Project
9 Coordinator within five calendar days of the change.

10 4.6. Project Engineer/Geologist. The work performed
11 pursuant to this Order shall be under the direction and
12 supervision of a qualified Professional Engineer or a Registered
13 Geologist with expertise in hazardous waste site cleanup. The
14 name and address of the project engineer or geologist chosen by
15 Respondent shall be submitted to the Department within 5
16 calendar days of the effective date of this Order.

17 4.7. Quarterly Summary Reports. After the effective
18 date of this Order and quarterly thereafter, Respondent shall
19 submit a Quarterly Summary Report of its technical/engineering
20 activities under the provisions of this Order. The report shall
21 describe: 1) specific actions taken by or on behalf of
22 Respondent during the previous calendar quarter; 2) actions
23 expected to be undertaken during the current calendar quarter;
24 3) all planned activities for next quarter; and 4) all results
25 of sample analyses, tests and other data generated or received
26 by SPTC. The Quarterly Summary Report shall be received by

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1 Respondent. The Quarterly Summary Report shall be received by
2 the Department by the 15th day of the next quarter following the
3 first full calendar quarter after the effective date of this
4 Order.

5 4.8. Incorporation of Documents. All plans, schedules,
6 reports, specifications, and other documents required or
7 submitted by Respondent to this Order, are, upon written
8 approval by the Department, incorporated into this Order and
9 shall be implemented by Respondent as approved.

10 4.9. Exhibits. All Exhibits attached hereto are
11 incorporated herein by this reference.

12 4.10. Submittals and Approvals. All Submittals and
13 notifications from Respondent required by this Order shall be
14 sent simultaneously to:

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17 Mr. Dwight Hoenig, Chief
18 Northern California Coast Section Toxic Substances
19 Control Division 2151 Berkeley Way, Annex 7
Berkeley, CA 94704

20 Mr. Steven Ritchie
21 Executive Officer
22 California Regional Water Quality Control Board
San Francisco Bay Region
1111 Jackson Street, Room 6040
Oakland, CA 94607

23 Mr. Jerry Clifford, Chief
24 Superfund Programs Branch, Region IX
25 U.S. Environmental Protection Agency
215 Fremont Street
San Francisco, CA 94105

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1 All approvals, decisions, notices, and requests made under
2 the Order shall be communicated to Respondent in writing by Mr.
3 Dwight Hoenig, Chief, or his designee. No informal advise,
4 guidance, suggestions or comments by the Department regarding
5 reports, plans, specifications, schedules or any other writing
6 prepared or submitted by or for Respondent shall be construed to
7 relieve Respondent of its obligation to obtain such formal
8 approvals as may be required herein.

9 4.11. Department Review and Approval. If after review
10 of any report, plan, schedule, remedial action plan or other
11 document which Respondent submits for Department approval
12 pursuant to this Order, the Department determines that the
13 document is not satisfactory and cannot be approved, the
14 Department may take the following actions:

15 (a) Return the submitted document to Respondent with
16 recommended changes. Within a time period specified by the
17 Department, Respondent and the Department shall meet and
18 discuss recommended changes and Respondent shall submit a
19 revised document, within a time period specified by the
20 Department incorporating the recommended changes to the
21 Department for approval. All such approvals by the
22 Department shall be in writing.

23 (b) In the event that Respondent and the department are
24 unable to reach an agreement on the changes, the Department
25 may exercise its authority under the Health and Safety Code
26 to modify the submitted document as deemed necessary to
27 protect public health and safety or the environment, and to

1 approve the document as modified.

2 4.12. Modifications. Respondent may by written request
3 seek modification, termination or revision of this Order or any
4 portion of this Order or any program or plan submitted pursuant
5 to this Order at any time. This Order and any applicable
6 program, plan, or schedule may be modified, terminated or
7 revised by the Department at any time. In addition, the
8 Department reserves the right to take additional enforcement
9 action including issuing new or additional lawful orders as
10 provided by law. Any modification to this Order pursuant to
11 this paragraph shall be effective upon issuance and deemed
12 incorporated into this Order.

13 4.13. Time Periods. Unless otherwise specified, time
14 periods begin from the effective date of this Order and "days"
15 means calendar days. If any action is required to be done on a
16 date which is a Saturday, Sunday or legal holiday, the time
17 within which the action is to be taken shall be extended to the
18 next business day following the Saturday, Sunday or legal
19 holiday.

20 4.14. Schedule. To assist the parties and others
21 concerned with implementation of this Order, the following
22 schedule is set forth:

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Due Date

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1. Groundwater Monitoring Program
(paragraph 3.1). 30 calendar days
after effective
date.
2. Remedial Investigation Data Study
Report (3.2). 120 calendar days
after effective
date.
3. Supplemental RI Sampling Plan,
if necessary (3.2.1). 30 calendar days
after Department
approval of 2 (RI
Data Study
Report).
4. Supplemental RI Data Study Report,
if necessary (3.2.2). 60 calendar days
after completion
of 3 (Supplemental
RI Sampling Plan)
in accordance
with the approved
schedule
(3.2.1.6).

- 1 11.. Remedial Design (4.3). 180 calendar days
- 2 after Department
- 3 approval of the
- 4 final RAP.
- 5 12. Finald RAP Implementation (4.4). . . In accordance
- 6 with the approved
- 7 schedule (4.3).
- 8 13. Project Coordinator and Engineer
- 9 (4.5 and 4.6). 5 calendar days
- 10 after effective
- 11 date.
- 12 14. Quarterly Reports (4.7). 15th day of each
- 13 calendar
- 14 quarter.

15 4.15. Extension Requests. If, for any reason,

16 Respondent is unable to perform any activity or submit any

17 document within the time required under this Order, Respondent

18 may request, in writing an extension of the time specified. The

19 extension request shall include a justification for the delay.

20 All such requests shall be in advance of the date on which the

21 activity or document is due.

22 4.16. Extension Approvals. The Department shall grant

23 the request and specify a new schedule, in writing, upon showing

24 that good cause exists for an extension. The new schedule shall

25 be deemed incorporated in the Order.

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1 4.17. Endangerment During Implementation. In the event
2 that the Chief of the North Coast California Section of the
3 Toxic Substances Control Division of the Department (or his
4 equivalent in any successor agency) determines that any
5 activities or circumstances are creating an imminent or
6 substantial endangerment to the health and welfare of people on
7 the site or in the surrounding area or to the environment, the
8 Section Chief (or equivalent) may order Respondent to stop
9 further implementation of this Order for such period of time as
10 needed to abate the endangerment. Any deadline contained in
11 this Order which is directly affected by a Stop Work Order under
12 this section shall be extended for the term of such Stop Work
13 Order.

14 4.18. Site Access. Respondent shall assist and cooperate
15 with the Department and/or its authorized representatives in
16 moving freely about all property at the Site and adjacent to it
17 at all reasonable times for the purposes of, inter alia:
18 inspecting records, operations logs, sampling and analytic data,
19 and contracts related to this Order; reviewing the progress of
20 Respondent in carrying out the terms of this Order; conducting
21 such tests as the Department may deem necessary; and verifying
22 the data submitted to the Department by Respondent. To the
23 extent that work required pursuant to this Order must be done on
24 property not owned or controlled by Respondent, Respondent shall
25 use its best efforts to obtain site access agreements from the
26 owners of such property within 60 days of request by the
27 Department. Best efforts as used in this paragraph shall
include, at a minimum, a certified letter from Respondent to the

1 owners of such properties requesting access agreements to permit
2 Respondent and authorized representatives of the Department
3 access to such properties. In the event that agreements for
4 site access are not obtained within 60 days of request by the
5 Department, Respondent shall notify the Department regarding its
6 failure to obtain such agreements within 15 days thereafter. In
7 the event that the Department obtains access, Respondent shall
8 undertake the work required pursuant to this Order. Nothing in
9 this paragraph is intended or shall be construed to limit in any
10 way the right of entry or inspection that the Department or any
11 other agency may otherwise have under law, or to take
12 appropriate enforcement actions against said property owners.

13 4.19. Sampling, Access, and Data/Document Availability.
14 Respondent shall permit the Department and/or its authorized
15 representatives to inspect and copy all sampling, testing,
16 monitoring or other data generated by or on Respondent's behalf
17 in any way pertaining to work and pursuant to this Order.
18 Respondent shall allow duplicate samples to be taken by the
19 Department and/or its authorized representatives of any samples
20 collected by Respondent pursuant to this Order. Respondent
21 shall maintain a central depository of the data, reports, and
22 other documents prepared pursuant to this Order. All data,
23 reports and other documents shall be preserved by Respondent for
24 a minimum of six years or three years after completion of the
25 work, whichever is later. If the Department requests that some
26 or all of these documents be preserved for a longer period of
27 time, Respondent shall either comply with that request or
deliver the documents to the Department or permit the Department

1 to copy the documents prior to destruction. Respondent shall
2 notify the Department in writing at least six months prior to
3 destroying any documents prepared pursuant to this Order.

4 4.20. Noncompliance. In the event that the Department
5 believes that Respondent is not in compliance with this Order,
6 or with any reports, plans, specifications, schedules or other
7 documents incorporated as part of this Order pursuant to
8 paragraph 4.8, the Department shall provide Respondent notice in
9 writing of such noncompliance and permit Respondent an
10 opportunity to remedy such noncompliance to the satisfaction of
11 the Department within the time period specified by the
12 Department in the notice. The Department may also seek
13 penalties for noncompliance as provided in paragraph 4.20. and
14 cost recovery the state funds expended as provided in paragraph
15 4.22. If Respondent remedies such noncompliance to the
16 satisfaction of the Department and within the time period
17 specified by the Department, Respondent shall not be deemed to
18 be in noncompliance with this Order.

19 4.21. Penalties for Noncompliance. Failure to comply
20 with the provisions of this Order, or with any reports, plans,
21 specifications, schedules or other documents incorporated as
22 part of this Order pursuant to paragraph 4.8., or any
23 modifications thereto, may subject Respondent to civil penalties
24 and/or punitive damages as provided by the California Health and
25 Safety Code sections 25188 and 25359, and other applicable
26 provisions of law, in addition to cost recovery as specified in
27 paragraph 4.22.

1 4.22. Cost Recovery. Respondent is liable for any costs
2 of oversight by the Department of Respondent activities under
3 this Order. In addition, failure or refusal of Respondent to
4 comply with this Order will make Respondent liable for any
5 government costs incurred, including those payable from the
6 Hazardous Substance Account or the Hazardous Substance Cleanup
7 Fund for any response action at the Site, as provided in Section
8 25360 of the Health and Safety Code , 42 USC Sec. 9601 et seq.
9 (CERCLA) and other applicable provisions of law. These costs
10 include the Department's direct and indirect costs. Such costs
11 shall be those recorded by the Department's accounting system
12 and will include costs both directly assigned to the Site as
13 incurred, as well as those indirect costs which the accounting
14 system may allocate to the Site, based upon the system's
15 internal allocation method. Additionally, the Department shall
16 bill for interest applicable to those direct and indirect costs
17 paid from the Hazardous Substance Cleanup Fund (created by
18 Section 25385.3 of the Health and Safety Code). These costs may
19 include a ten percent (10%) administrative surcharge.

20 4.23. Additional Enforcement Actions. By issuance of
21 this Order, the Department does not waive any further
22 enforcement actions.

23 4.24. Compliance with Applicable Laws. Respondent shall
24 carry out this Order in compliance with all applicable local,
25 State, and Federal requirements, including, but not limited to,
26 requirements to obtain permits and to assure worker safety. The
27 Department will assist Respondent in requesting review and

1 comment by the RWQCB and EPA on activities conducted under this
2 Order so that Respondent may know what actions may be necessary
3 to fulfill legal and regulatory obligations under the
4 authorities of these agencies.

5 4.25. Government Liabilities. The State of California
6 shall not be liable for any injuries or damages to persons or
7 property resulting from acts or omissions by Respondent, its
8 officers, directors, employees, agents, receivers, trustees,
9 successors, or of any persons, including but not limited to
10 firms, corporations, subsidiaries, contractors, or consultants
11 in carrying out activities pursuant to this Order, not shall the
12 State of California be held as party to any contract entered
13 into by Respondent or its agents in carrying out activities
14 pursuant to this Order.

15 4.26. Reservation of Rights. Nothing in this Order is
16 intended or shall be construed to limit the rights of any of the
17 parties hereto with respect to claims arising out of or relating
18 to the deposit or disposal at any other location of substances
19 removed from the Site. Nothing in this Order is intended or
20 shall be construed to limit or preclude the Department from
21 taking any other action authorized by law to protect the public
22 health and welfare or the environment and recovering the costs
23 thereof. Nothing in this Order is intended or shall be
24 construed to limit or preclude any statutory right that
25 Respondent has or may have to seek judicial review of orders or
26 determinations by the Department, including but not limited to
27 determinations made by the Department pursuant to Section
4.11.(b) of this Order. Nothing in this Order is intended or

1 shall be construed to limit any right of Respondent to
2 arbitration or seek to recover costs it has incurred for
3 remedial actions at the Site.

4 4.27. Severability. The requirements of this Order are
5 severable, and Respondent shall comply with each and every
6 provision hereof notwithstanding the effectiveness of any other
7 provision.

8 4.28. Parties Bound. This Order applies to and is
9 binding according to its terms upon Respondent, its directors,
10 officers, agents, employees, contractors, and their successors
11 and assigns and upon the Department and any successor agency
12 with responsibility for administering the provisions of Chapter
13 6.8. of Division 20 of the Health and Safety Code.

14 4.29. Representative Authority. Each undersigned
15 representative of the parties to this Order certifies that he or
16 she is fully authorized to enter into the terms and conditions
17 of this Order and to execute and to legally bind such party to
18 this document.

19 4.30. Interagency Coordination. All approvals, reviews,
20 or modifications of any reports, plans, schedules, or any other
21 document submitted to the Department by Respondent shall be done
22 in coordination with the RWQCB.

23 4.31. Binding on Successors. The parties to this Order
24 specifically agree that this Order shall be binding upon all
25 assigns, successors, or takers in interest of any nature. The
26 parties recognize that no party shall evade its obligations
27 under this agreement by any transfer or assignment of ownership,
leasehold, interest, or other right herein.

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It is so ordered this 14th day of December,
1988.

Dwight Hoenig 12/14/88
Dwight Hoenig, Chief (Date)
Region 2
Toxic Substances Control Division

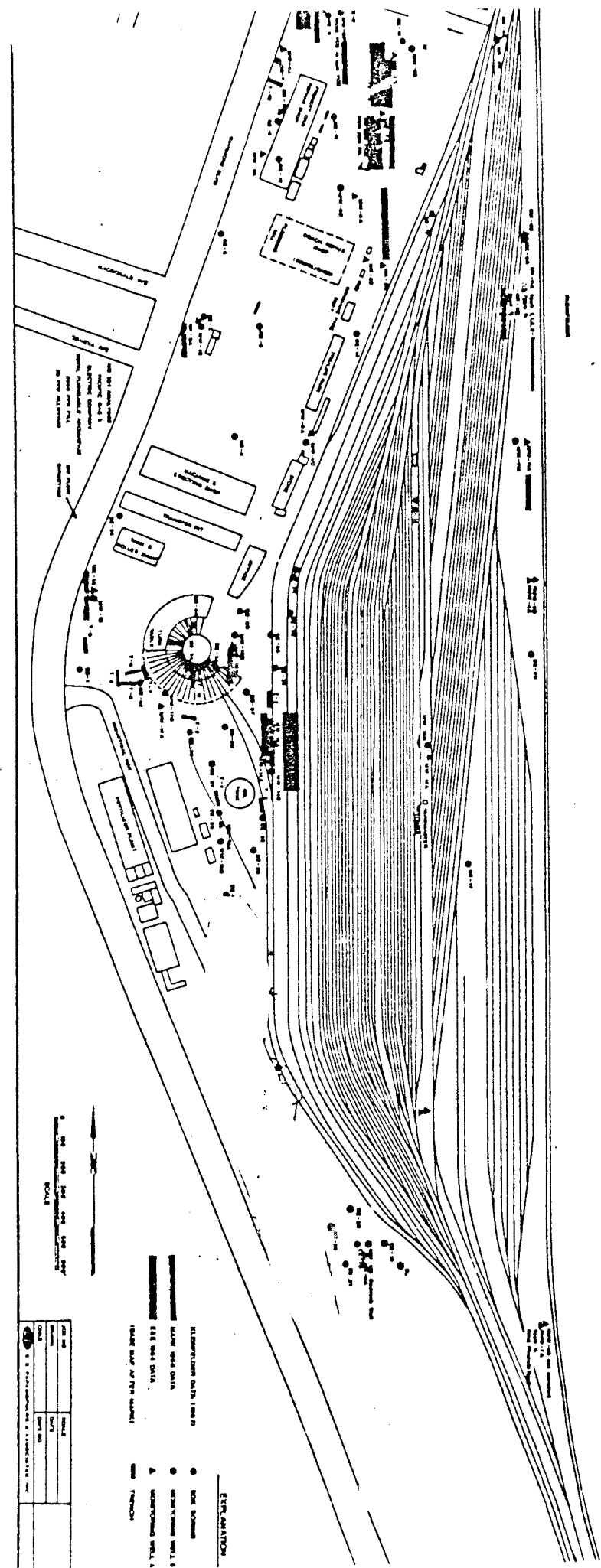
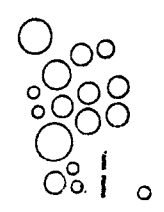


EXHIBIT 1
 Southern Pacific Transportation Co.
 Brisbane, California

EPA REGION 9 SITE PRIORITIZATION PROFILE

1.0 SITE INFORMATION

Southern Pacific Trans Co

Site Name	SOUTHERN PACIFIC TRANSPORTATION COMPANY - BRISBANE RAILYARD		
City/County/State	BRISBANE, SAN MATEO COUNTY, CA		
CERCLIS ID#	CAD980638415		
Site Operation (e.g. plating shop, dry cleaner, mining, landfill, Federal Facility)	Railyard		
Regulatory Agencies Involved (e.g. EPA, DTSC, RWQCB, ADEQ, HDOH, NDEP, Navajo Nation)	EPA, DTSC, RWQCB		
CERCLIS Status/Date (e.g. PA, SI, HRS Package, NPL, GAO backlog, RCRA deferral)	PA 1 - 1982; PA 2 - 1985; SI - 1992; HRS Scoresheet - 1992; Site Screening Checklist - 1997; GAO Backlog - 1998.		

2.0 HRS SUMMARY

HRS Score	42.68 (1992)	Pathway of Concern	Groundwater	Targets (e.g. actual exposure, potential exposure)	Potential
HRS Contaminants	Sampling Result (include media and date)		HRS Benchmark (specify using SCDM)	Other Benchmark (e.g. MCL, PRG, NOAA)	
Vinyl Chloride	18 mg/kg soil 0.37 mg/L - gw - 1997		4.5x10 ⁻⁵ mg/L CRSC	0.022 mg/kg PRG, 2.0x10 ⁻³ mg/L MCL	
Trichloroethylene	3 mg/kg soil 210 mg/L - gw - 1997		7.7x10 ⁻³ mg/L CRSC	2.8 mg/kg PRG, 5.0x10 ⁻³ mg/L MCL	
Tetrachloroethylene	0.7 mg/kg - soil 5.9 mg/L - gw - 1997		1.6x10 ⁻³ mg/L CRSC	5.7 mg/kg PRG, 5.0x10 ⁻³ mg/L MCL	
Sampling Data Confidence <input type="checkbox"/> No oversight; no QA/QC; no data <input type="checkbox"/> Regulatory oversight; partial or unknown QA/QC <input checked="" type="checkbox"/> Regulatory oversight; QA/QC validation			Remediation Cost Consideration <input checked="" type="checkbox"/> Likely very expensive or difficult <input type="checkbox"/> Easy and relatively cheap		

3.0 OTHER INFLUENCING FACTORS

Regulatory Agency/Relevant Activities:	DTSC and RWQCB are actively providing oversight for the property.
PRP Viability:	Universal Paragon (aka Sunquest or Tuntex) owner since 1990. The company intends to develop the property and appears to be cooperative with regulators
Other Influencing Factors:	DTSC and RWQCB believe the company has adequate resources to complete the cleanup.

For SST Use Only.

Prioritization Summary Recommendations

SST RECOMMENDED PRIORITY:
(indicate HIGH, MEDIUM, LOW, or NFA)

(complete attached site prioritization worksheet)

SST CONCURRENCE:

Date:

4.0 SITE PRIORITIZATION WORKSHEET

The following risk-based criteria should be used as a guideline to assist in the prioritization of CERCLIS sites. These guidelines can be used in various stages of assessment. When interpreting the information provided below, one should understand that conservative assumptions were made where information is lacking and the risk value is subjective.

Site screeners should complete this form by using the categories as guidelines. The "Notes" sections should be used to document assumptions made, data sources, or other information pertinent to determining risk prioritization.

5.0 HAZARD IDENTIFICATION

Complete the sections below for the suspected contaminants of greatest concern. Use SCDMs as a reference for assigning hazardous substance risk category. Assign a Hazard Factor for each hazardous substance evaluated and then assign an Overall Hazard Factor Value by selecting the higher of the two Hazard Factors. If only one hazardous substance is evaluated, the Overall Hazard Factor Value will be the same as the Hazard Factor for A.

HAZARDOUS SUBSTANCE A: <u>Vinyl Chloride</u>			
Estimate the hazard properties for this hazardous substance.			
Hazard Property	HIGH	MEDIUM	LOW
Quantity	<input checked="" type="checkbox"/> $\geq 10,000$ lbs; or ≥ 5 mil. gals; or $\geq 25,000$ yds ³ ; or ≥ 1 acre	<input type="checkbox"/> $< 10,000$ lbs and ≥ 100 lbs; or < 5 mil. gals and $\geq 50,000$ gals; or $< 25,000$ yds ³ and ≥ 250 yds ³ ; or < 1 acre and ≥ 500 ft ²	<input type="checkbox"/> < 100 lbs; or $< 50,000$ gals; or < 250 yds ³ ; or < 500 ft ²
Toxicity	<input checked="" type="checkbox"/> $\geq 10,000$	<input type="checkbox"/> $< 10,000$ and ≥ 100	<input type="checkbox"/> < 100
Mobility	<input checked="" type="checkbox"/> 1	<input type="checkbox"/> < 1 and ≥ 0.001	<input type="checkbox"/> < 0.001
Bioavailability	<input type="checkbox"/> $\geq 1,000$	<input type="checkbox"/> $< 1,000$ and ≥ 10	<input type="checkbox"/> < 10
Concentration (if known)	<input checked="" type="checkbox"/> \geq benchmark = 4.5×10^{-5} mg/L	<input type="checkbox"/> near benchmark =	<input type="checkbox"/> low relative to benchmark =
Level of Containment	<input checked="" type="checkbox"/> None	<input type="checkbox"/> Partial	<input type="checkbox"/> Full
Hazard Factor for A	<u>HIGH</u>	MEDIUM	LOW

Comments: A groundwater extraction and treatment system has been online since 1994. Vinyl chloride was chosen because it has the highest toxicity of VOCs detected in groundwater.

Quantity: Information in the NUS Site Inspection describes areas of contamination greater than 1 acre.

Toxicity/Mobility/Bioavailability: From SCDM

Concentration: Highest concentration of vinyl chloride detected in groundwater in 6/97 was 0.37 mg/L.

Level of Containment: Vinyl chloride was detected in soil and groundwater at the site.

HAZARDOUS SUBSTANCE B: <u>Tetrachloroethylene</u>			
Estimate the hazard properties for this hazardous substance.			
Hazard Property	HIGH	MEDIUM	LOW
Quantity	[X] $\geq 10,000$ lbs; or ≥ 5 mil. gals; or $\geq 25,000$ yds ³ ; or ≥ 1 acre	[] $< 10,000$ lbs and ≥ 100 lbs; or < 5 mil. gals and $\geq 50,000$ gals; or $< 25,000$ yds ³ and ≥ 250 yds ³ ; or < 1 acre and ≥ 500 ft ²	[] < 100 lbs; or $< 50,000$ gals; or < 250 yds ³ ; or < 500 ft ²
Toxicity	[] $\geq 10,000$	[X] $< 10,000$ and ≥ 100	[] < 100
Mobility	[X] 1	[] < 1 and ≥ 0.001	[] < 0.001
Bioavailability	[] $\geq 1,000$	[] $< 1,000$ and ≥ 10	[] < 10
Concentration (if known)	[X] \geq benchmark = 1.6×10^{-3} mg/L	[] near benchmark =	[] low relative to benchmark =
Level of Containment	[X] None	[] Partial	[] Full
Hazard Factor for B	HIGH	MEDIUM	LOW

Comments: A groundwater extraction and treatment system has been online since 1994.

Quantity: Information in the NUS Site Inspection describes areas of contamination greater than 1 acre.

Toxicity/Mobility/Bioavailability: From SCDM.

Concentration: Highest concentration of tetrachloroethylene detected in groundwater in 6/97 was 5.9 mg/L.

Level of Containment: Tetrachloroethylene was detected in soil and groundwater at the site.

OVERALL HAZARD FACTOR: HIGH MEDIUM LOW

6.0 VULNERABILITY ANALYSIS

Assign a high, medium, or low priority category to each of the following factors. Assign an Overall Vulnerability Factor Value for the site based on the dominant vulnerability risk categories.

Vulnerability Factor	High	Medium	Low
1. Environmental Setting - Land use within 0.5 miles of the site	<input checked="" type="checkbox"/> Residential	<input type="checkbox"/> Agricultural/ Commercial	<input type="checkbox"/> Industrial
2. Sensitive Populations - Distance to nearest day care center, school, nursing home, or hospital	<input checked="" type="checkbox"/> Within 0.25 miles of site		<input type="checkbox"/> More than 0.25 miles from site
3. Population Density - Evaluate within 0.5 miles	<input type="checkbox"/> Dense	<input checked="" type="checkbox"/> Moderate	<input type="checkbox"/> Sparse
4. Groundwater Contamination - Evaluate groundwater contamination within 4 miles of the site	<input checked="" type="checkbox"/> Documented Release	<input type="checkbox"/> Potential for Release	<input type="checkbox"/> Release Not likely
5. Groundwater Use - Wells used for drinking water are located	<input type="checkbox"/> Within 0.5 miles of the site	<input type="checkbox"/> 0.5 to 2 miles from site	<input checked="" type="checkbox"/> More than 2 miles from site
6. Surface Water Location - Distance to nearest surface water body	<input checked="" type="checkbox"/> Within 0.5 miles of the site	<input type="checkbox"/> 0.5 to 2 miles from site	<input type="checkbox"/> More than 2 miles from site
7. Sensitive Habitats - Distance to nearest sensitive habitat	<input checked="" type="checkbox"/> Within 0.5 miles of the site	<input type="checkbox"/> 0.5 to 2 miles from site	<input type="checkbox"/> More than 2 miles from site
8. Soil/Air Contamination - Evaluate the potential for exposure to individuals from contaminated soil or air releases	<input type="checkbox"/> Documented or probable exposure	<input type="checkbox"/> Potential for exposure	<input checked="" type="checkbox"/> Exposure not likely

Comments: 1. Residential neighborhood located within 0.5 mile, based on map review.

2. Candlestick Cove School is located within 0.25 mile of the site.

3. 1989 population data indicates a population of 34 within 0.5 mile of the site. The population rises to over 100,000 between 1 to 2 miles from the site. Due to the dated nature of population data and increasing population trends in the area, it can be reasonably assumed that the population density has increased near the site.

4. Sampling activities at the site have confirmed the presence of contaminants associated with the site in groundwater.

5. The nearest public well is located 2.5 miles to the west of the site.

6. San Francisco Bay is located 2,500 feet to the east of the site.

7. There is a wetland located less than 0.25 mile from the site.

8. The site is fenced along its northern and western borders; there are no known access restrictions along the eastern and southern sides. A guard has been hired by the current owners to prohibit trespassers.

OVERALL VULNERABILITY FACTOR: **HIGH** MEDIUM LOW

7.0 OTHER INFLUENCING FACTORS

Assign a high, medium, or low priority category to each of the following factors.

Other Influences	High	Medium	Low
1. Site remedial/ removal history	<input type="checkbox"/> None	<input checked="" type="checkbox"/> Some	<input type="checkbox"/> All wastes removed
2. Regulatory involvement	<input type="checkbox"/> No involvement	<input type="checkbox"/> Somewhat active	<input checked="" type="checkbox"/> Very Active
3. Environmental justice	<input checked="" type="checkbox"/> Site is in a low income or minority neighborhood		<input type="checkbox"/> Site is <u>not</u> in a low income or minority neighborhood
4. Brownfields/Redevelopment	<input checked="" type="checkbox"/> Possible candidate		<input type="checkbox"/> Not a likely candidate
5. Political attention	<input type="checkbox"/> Very visible	<input checked="" type="checkbox"/> Some attention	<input type="checkbox"/> None
6. Public attention	<input type="checkbox"/> Very visible	<input checked="" type="checkbox"/> Some attention	<input type="checkbox"/> None

Comments: 1. A groundwater extraction and treatment system has been online since 1994 in the northern area, Operable Unit 1 (OU-1), with DTSC oversight.

2. Site is currently being remediated for contamination under authority of RWQCB and DTSC.

3. According to 1997 Site Screening Checklist, the site is in a low income/minority neighborhood.

4. Site is vacant and cleared of most buildings. Current owner is a property development group, Universal Paragon (aka Sunquest, Tuntex). Universal Paragon is performing remediation activities with the goal of redevelopment.

5. According to 1997 Site Screening Checklist, the site has received some political attention.

6. The Citizens League for Environmental Action Now (CLEAN) and the Bay Area Mountain Watch have raised concerns about the site. The community was reportedly unhappy about the site being sold to a foreign owned development company.

OTHER INFLUENCING FACTORS:

HIGH

MEDIUM

LOW

8.0 SUMMARY OF PRIORITIZATION FACTORS

Reviewer will summarize the priorities assigned to the risk factors discussed above. For sites that do not score above 28.5 according to the HRS, assign No Further Action (NFA) to the overall site priority.

OVERALL HAZARD FACTOR	<u>HIGH</u>	MEDIUM	LOW
OVERALL VULNERABILITY FACTOR	<u>HIGH</u>	MEDIUM	LOW
OTHER INFLUENCING FACTORS	HIGH	<u>MEDIUM</u>	LOW

OVERALL SITE PRIORITY:
(indicate HIGH, MEDIUM, LOW, or NFA)

MEDIUM

Reviewer: Jason Musante, E & E START

Date: 12/20/99

SST Use Only

9.0 SST RECOMMENDATION

Summary recommendation

OVERALL SITE PRIORITY:
(indicate HIGH, MEDIUM, or LOW)

SST RECOMMENDATION

- Forward site to the RDT for listing
- Need additional site information (e.g. initiate SI or ESI)
- Do not forward site at this time
- Maintain site under State Lead
- Site is low priority
- Archive site per the PUP policy

Additional Comments:

SST CONCURRENCE:

Date:

- Please attach the following information (only if it is relevant and available):
- A. Contact Report
 - B. Site Observation Report
 - C. Investigation History and Sampling Results

2.0 HRS Summary

The Southern Pacific Transportation Company (SPTCo) - Brisbane Railyard site consists of an approximately 180-acre compound located in Brisbane, California. Currently, the site is largely unvegetated and level. Several building foundations and track remenants were located throughout the site. Three of the former railyard buildings are present on site. SPTCo owned the Bayshore Railyard site from 1896 to 1990. The site was used for railcar rehabilitation and maintenance operations from 1914 to 1960. The site is bordered on the west by Bayshore Boulevard and Industrial Way and the commercial and industrial businesses that line these roads. To the east is a SPTCo freight rail line, a large undeveloped parcel of filled land, and the inactive Brisbane landfill. San Francisco Bay is located 2500 feet to the east.

The sources of contamination at the site are related to railyard operations. The specific operations, as they pertain to waste generation, handling, and disposal, are not known; however they can be assumed to have been consistent with similar railyard operations that utilized alkaline/caustic cleaners, corrosion inhibitors, grease, lubricating oils, fuel oils, organic solvents, and paints and thinners. A leaky, 3 million gallon, above-ground oil storage tank is known to have existed onsite. Site investigations have identified four main areas of contamination: the northern area (approx. 20,000 sq. ft.), the oil tank area and the turntable area (approx. 80,000 sq. ft. combined), and a southern disposal area (approx. 140,000 sq. ft.). The following compounds have been detected at the site during soil and groundwater studies: trichloroethylene (3 ppm soil/210,000 ppb groundwater), tetrachloroethylene (0.70 ppm soil/5,900 ppb groundwater), 1,1-dichloroethene (300 ppb groundwater), cis and/or trans 1,2-dichloroethylene (50 ppm soil/3000 ppb groundwater), vinyl chloride (18 ppm soil/370 ppb groundwater), 1,1,2-trichloroethane (200 ppb groundwater), toluene (5 ppm soil), ethyl benzene (8 ppm soil), xylene (30 ppm soil), petroleum hydrocarbons: waste oil (24,000 ppm soil) and diesel fuel (16,000 ppm soil), copper (430 ppm soil), lead (6,700 ppm soil), and arsenic (19 ppm soil). Because the sole operator at the site was SPTCo and the fact that the above compounds were detected at the site, it can be assumed that SPTCo generated and disposed of (knowingly or unknowingly) these materials at the site.

In April 1982, SPTCo notified the EPA, DHS and the RWQCB that the presence of metals, oil, grease, and solvents were detected in the soil at the site. Since then, both DTSC and RWQCB have been actively involved with the site (see attached summary of past regulatory action). In 1988, DTSC submitted to SPTCo a Remedial Action Order to begin groundwater monitoring, complete a RI/FS, and produce a remedial action plan. In 1990 the site was purchased from SPTCo by Universal Paragon (aka Sunquest or Tuntex). DTSC issued an Imminent and/or Substantial Endangerment Order, requiring Tuntex to continue with the work specified in the 1988 Remedial Action Order. The site was divided into two operable units in 1995. Operable Unit 1 is the northern area. DTSC is the lead agency for Operable Unit 1 and has approved the installation and operation of a groundwater remediation system in this area. Operable Unit 2 includes the former oil tank area, the turntable, and the southern disposal area. The RWQCB is the lead agency for Operable Unit 2 and is currently reviewing Universal Paragon's conceptual Remedial Action Plan. Universal Paragon has been responsive to regulatory orders and DTSC and RWQCB have been overseeing remedial activities. DTSC and the RWQCB believe the company has the financial resources to complete the remediation. Universal Paragon intends to redevelop the property.

An HRS score of 42.68 was last derived for the site in 1992. The score was based on an observed release to groundwater. The HRS rationale #1 raises doubt about whether the background samples were appropriately chosen. In addition, the groundwater target population was not calculated correctly. Based on state agency lead activities and PRP viability, it appears that EPA involvement is not necessary.

CONTACT REPORT

AGENCY/AFFILIATION: RWQCB		
DEPARTMENT: Region 2 - San Francisco		
ADDRESS/CITY: 1515 Clay Street, Suite 1400, Oakland		
COUNTY/STATE/ZIP: Alameda, CA 94612		
CONTACT(S)	TITLE	PHONE
Randy Lee	Associate Water Resource Control Engineer	(510) 622-2375
E & E PERSON MAKING CONTACT: J. Musante		DATE: 12/7/99
SUBJECT: RWQCB site activity		
SITE NAME: Southern Pacific Transportation Company - Brisbane Railyard		EPA ID#: CAD980638415

DISCUSSION:

I contacted Mr. Lee regarding RWQCB activity at the site. Mr. Lee said that DTSC and the RWQCB have been working together as lead agency for the site. DTSC is the lead for the northern area of the site. The RWQCB is the lead for the southern disposal area and the former oil tank and turntable area.

The RWQCB activity has primarily been in an oversight capacity for the site owner, Sunquest (formerly Tuntex, Inc.). Currently, the RWQCB is reviewing Sunquest's Remedial Action work plan (conceptual). Sunquest has been cooperating with the RWQCB, and they appear to have the resources to complete remediation.

Mr. Lee said that the contaminants of concern at the site are diesel and Bunker C oil at the former oil tank and turntable area, and heavy metals at the southern disposal area.

CONTACT CONCURRENCE _____ DATE _____

CONTACT REPORT

AGENCY/AFFILIATION: DTSC		
DEPARTMENT: Region 2		
ADDRESS/CITY: 700 Heinz Ave., Suite 200, Berkeley		
COUNTY/STATE/ZIP: Alameda, CA 94710		
CONTACT(S)	TITLE	PHONE
Virginia Lasky		510-540-3817
PERSON MAKING CONTACT: J. Musante		DATE: 12/15/99
SUBJECT: DTSC activity (inquiry)		
SITE NAME: Southern Pacific Transportation Company - Brisbane Railyard		EPA ID#: CAD980638415

DISCUSSION:

I contacted Virginia Lasky regarding DTSC activity at the site. According to Ms. Lasky, DTSC and the RWQCB are working together as lead agency for the site. DTSC has the lead for the northern area. Ms. Lasky stated that she is the lead person for oversight of the implementation and operation of the remedial groundwater carbon adsorption system at the site. The major contaminants of concern at the site are perchloroethylene, trichloroethylene, and petroleum hydrocarbons. According to Ms. Lasky, DTSC has enough funding for oversight activities and Universal Paragon (RP) appears to have the resources to complete the Remedial Action Plan. Universal Paragon is cooperating with DTSC requests.



EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 11 - ENFORCEMENT INFORMATION

I. IDENTIFICATION

01 STATE
CA

02 SITE NUMBER
CAD980638415

II. ENFORCEMENT INFORMATION

01 PAST REGULATORY ACTION YES NO

02 DESCRIPTION OF FEDERAL, STATE, LOCAL REGULATORY/ENFORCEMENT ACTION

On February 28, 1983, CA DHS issued a Notice of Violation to SPTCo, citing the conditions outlined in the Harding Lawson Report. CA DHS directed SPTCo to correct specific deficiencies in the report, determine the extent of soil contamination at the site, and remove and dispose the contaminated soils. A plan of correction was required within 30 days.

In March 1985, CA DHS, Toxic Substances Control Division completed a preliminary assessment of the subject site. The report was submitted to EPA Region IX on August 7, 1985.

On April 18, 1985, CA DHS, based on the findings of the Ecology and Environment report, ordered SPTCo to begin a remedial investigation feasibility study of the site. A proposal for the study was to be received by CA DHS by May 8, 1985.

On December 13, 1985, the County of San Mateo Department of Health Services (SMDOHS) issued a Notice of Violation to SPTCo for the leaky oil tank at the site. SMDOHS ordered SPTCo to construct a fence around the tank within seven days.

On December 17, 1985, CA DHS issued SPTCo a Determination and Notice of Compliance Order requiring them to post the site with hazardous substance area signs and to enclose the contaminated areas of the site, including the oil tank, the sump at the northwest end of the site, and the oil separator at the southwestern side of the site with fencing.

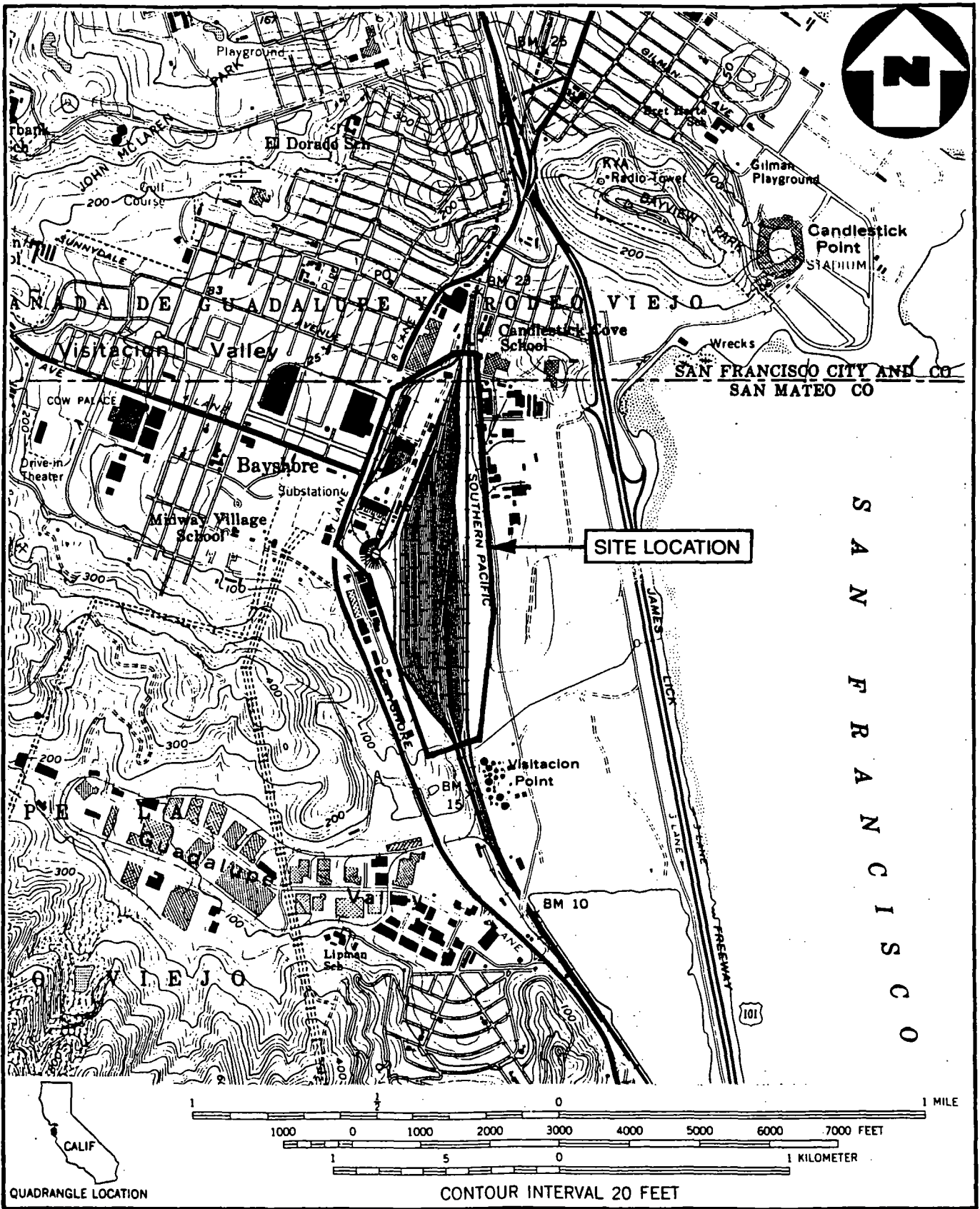
On January 29, 1986, CA DHS sent a draft Remedial Action Order to SPTCo for review. The Remedial Action Order required SPTCo to complete a remedial investigation of the site and a remedial action based on the results of the remedial investigation.

On December 5, 1988, CA DHS submitted to SPTCo a Remedial Action Order. SPTCo was ordered, upon approval of the remedial action order to begin groundwater monitoring at the site, complete a remedial investigation feasibility study, conduct a preliminary public health and environmental evaluation, produce a remedial action plan, and pay costs for agency oversight. A schedule for adherence was provided.

On February 23, 1990, CA DHS issued an Imminent and/or Substantial Endangerment Order to Tuntex. The order required Tuntex to continue with the work at the site as specified in the December 15, 1988 remedial action order.

III. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

California Department of Health Services, File information.
California Regional Water Quality Control Board, File information,



SOURCE: (7.5 MINUTE SERIES) U.S.G.S. SAN FRANCISCO SOUTH, CAL. QUAD.

SITE LOCATION MAP

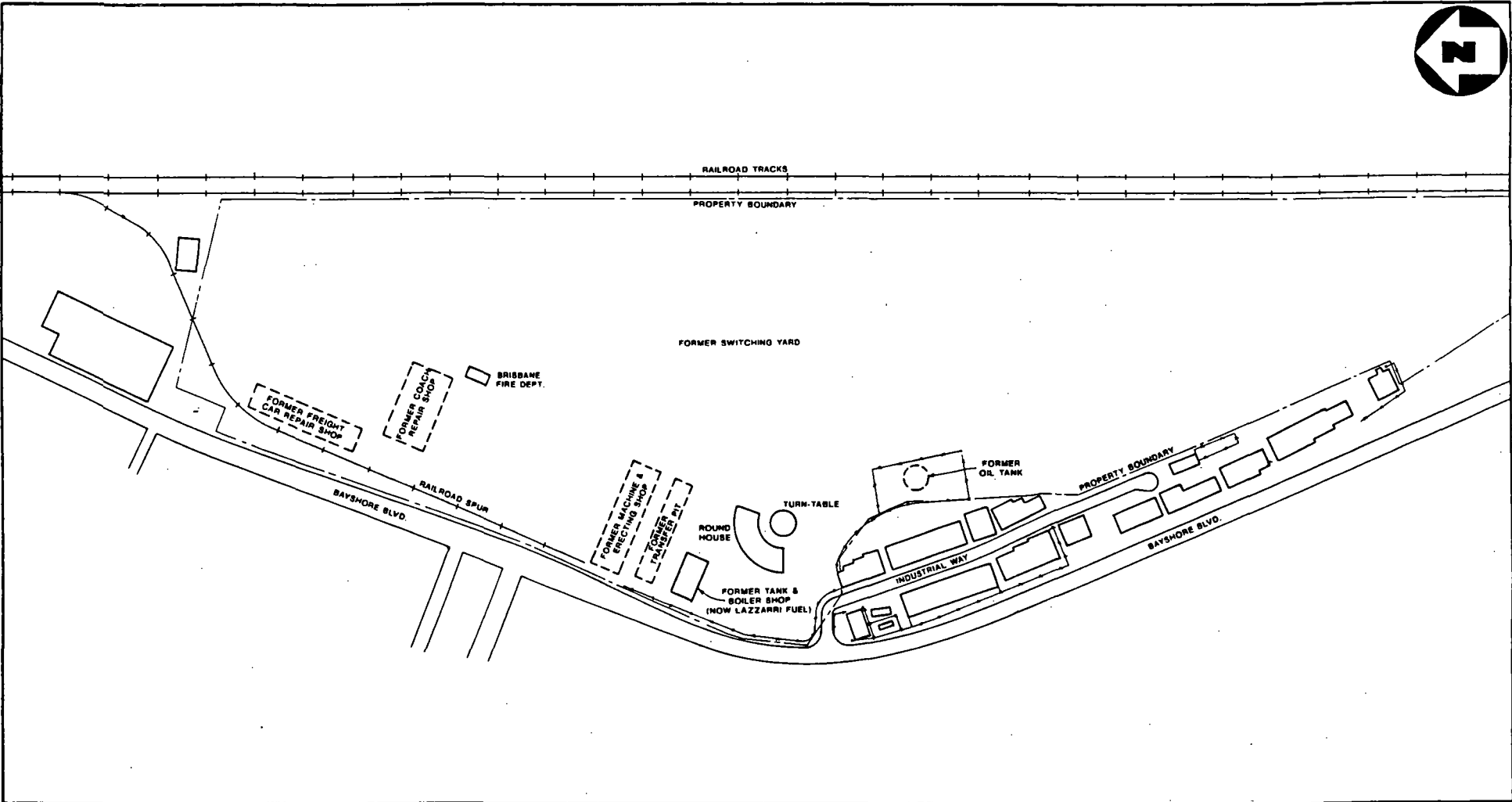
SOUTHERN PACIFIC-BRISBANE RAILYARD, BRISBANE, CAL.

SCALE 1: 24000

FIGURE 2.1



2-3



SITE SKETCH
SOUTHERN PACIFIC-BRISBANE RAILYARD, BRISBANE, CAL.
 (NO SCALE)

Attachment C

SITE SCREENING SAMPLING EVENT SUMMARY TABLE

Site Name: Southern Pacific Trans. Brisbane

Site Screener: Karen Toth

Date	Event	Media	Location	Depth	Method	Quality	Result	Benchmark
04/90	Remedial Investigation	Soil	North Area SG1-11-0	0 ft	200 series	High	Lead 790 ppm	PRG (Indust.) 1000 ppm
			NSB-3-15A	15 ft bgs	Mod. 8015		TPH Diesel 16,000 ppm TPH Oil 24,000 ppm	
			South Area SDSB-6-4A	4 ft bgs	200 series		Lead 6700 ppm	1000 ppm
			Oil Tank Area OTSB-5-9A	9 ft bgs	Mod. 8015		TPH Diesel 8,000 ppm TPH Oil 22,000 ppm	

Key:

Date - Date sample was collected.**Event** - Who did it and why?**Media** - e.g., groundwater, soil, air, etc.**Sample Location** - Physical location with respect to source (e.g., up- or downgradient).**Sample Depth** - For soil, depth below ground surface sample was collected. For groundwater, depth of well screen.**Method** - Analytical testing method used.**Data Quality** - QA/QC level (high, medium, or low)**Result** - Analytical results (parameter/value, units)**Benchmark** - Risk-based benchmark for parameters in the same units as results.

Attachment C

SITE SCREENING SAMPLING EVENT SUMMARY TABLE

Site Name: Southern Pacific Trans. Brisbane

Site Screener: Karen Toth

Date	Event	Media	Location	Depth	Method	Quality	Result	Benchmark
06/90	Quarterly Groundwater Sampling	Groundwater	LF-10B	35-45 ft bgs	8260	High	TCE 94,000 ppb	MCL 5 ppb
			LF-9A	10-20 ft bgs		High	C/T-DCE 5 ppb	6 ppb
							TCE 30,000 ppb	5 ppb
							PCE 5,900 ppb	5 ppb
			LF-9B	34-44 ft bgs		High	C/T-DCE 6 ppb	6 ppb
							TCE 28,000 ppb	5 ppb
			PCE 2,500 ppb	5 ppb				

Key:

Date - Date sample was collected.**Event** - Who did it and why?**Media** - e.g., groundwater, soil, air, etc.**Sample Location** - Physical location with respect to source (e.g., up- or downgradient).**Sample Depth** - For soil, depth below ground surface sample was collected. For groundwater, depth of well screen.**Method** - Analytical testing method used.**Data Quality** - QA/QC level (high, medium, or low)**Result** - Analytical results (parameter/value, units)**Benchmark** - Risk-based benchmark for parameters in the same units as results.

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SITE SCREENING SAMPLING EVENT SUMMARY TABLE

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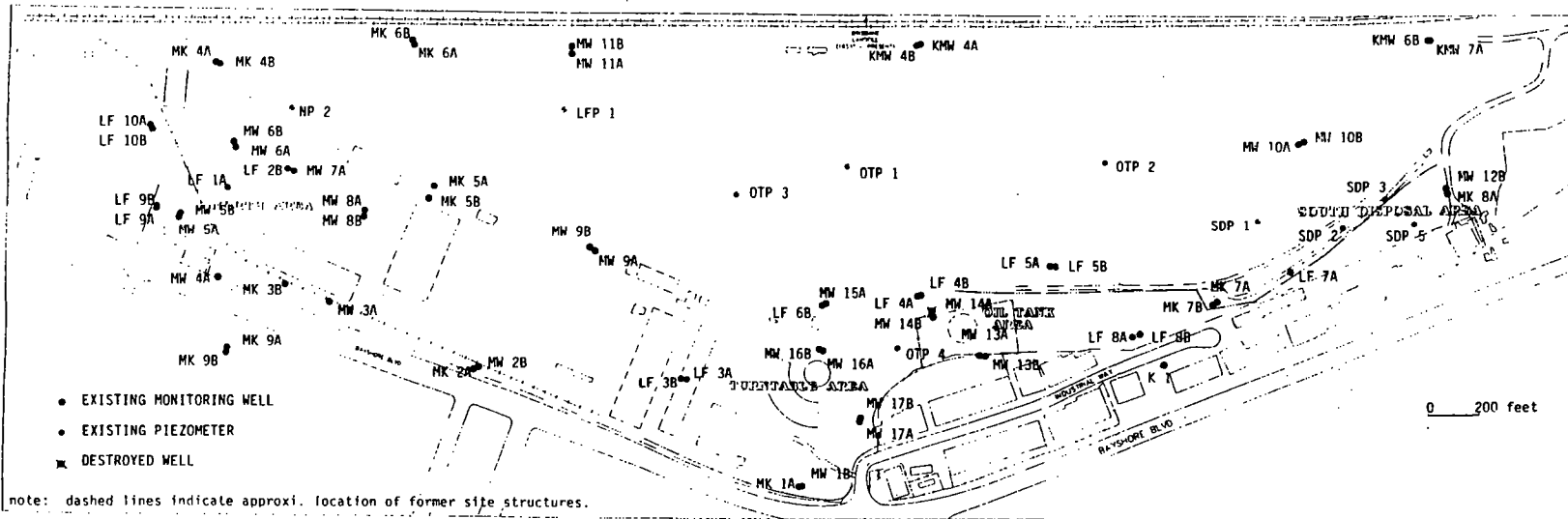
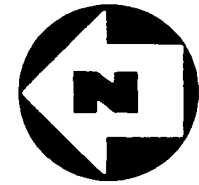
Site Screener: Karen Toth

Date	Event	Media	Location	Depth	Method	Quality	Result	Benchmark
06/97	Quarterly Groundwater Sampling	Groundwater	LF-10B	35-45 ft bgs	8260	High	TCE 210,000 ppb	MCL 5ppb
			LF-11A	10-20 ft bgs		High	Vinyl Chloride 370 ppb	0.5 ppb
							C-DCE 2,700 ppb	6 ppb
							T-DCE 170 ppb	6 ppb
			LF-9A	10-20 ft bgs		High	TCE 3,400 ppb	5 ppb
							PCE 5300 ppb	5 ppb
							C-DCE 140 ppb	6 ppb
							T-DCE 17 ppb	6 ppb
			LF- 9B	34 -44 ft bgs		High	TCE 310 ppb	5 ppb
							PCE 550 ppb	5 ppb
							TCE 8,100 ppb	5 ppb

Key:

Date - Date sample was collected.**Event** - Who did it and why?**Media** - e.g., groundwater, soil, air, etc.**Sample Location** - Physical location with respect to source (e.g., up- or downgradient).**Sample Depth** - For soil, depth below ground surface sample was collected. For groundwater, depth of well screen.**Method** - Analytical testing method used.**Data Quality** - QA/QC level (high, medium, or low)**Result** - Analytical results (parameter/value, units)**Benchmark** - Risk-based benchmark for parameters in the same units as results.

MK wells installed by the Mark Group (1986)
 MW wells installed by Ecology and Environment (1984)
 KMW wells installed by Kleinfelder (1987)
 LF wells installed by Levine-Fricke
 Piezometers installed by Levine-Fricke



3-10

Modified from Levine and Fricke. For Tuntex Properties, Inc. (Brisbane). Supplemental Remedial Investigation Data Study Report. The Bayshore Rail road, Brisbane, California. Volume I. Project Number 2034.16. July 31, 1990.

FIGURE 3.2

WELL LOCATION MAP
 SOUTHERN PACIFIC TRANSPORTATION COMPANY SITE
 San Mateo County, California





ecology and environment, inc.

120 HOWARD STREET, SUITE #640, SAN FRANCISCO, CALIFORNIA 94105, TEL. 415-777-2811

International Specialists in the Environment

SFUND RECORDS CTR
2068377

RECOMMENDATION FOR FURTHER ACTION

DATE: January 19, 1987
PREPARED BY: Matt Lacey, Ecology and Environment, Inc.
SITE: Stauffer Chemical Company
200 Industrial Way
Brisbane, CA 94005
San Mateo County

TDD #: F9-8612-46
EPA ID #: CAD980636948

1. Initial FIT Conclusions and Recommendations For Further Action:

a) Site Description:

The Stauffer Chemical Company (SCC) operated and owned a bone-glue and bone-char plant at 200 Industrial Way, Brisbane, California, from 1951 to 1963 (see Site Location Map, Figure 1.0). The site is currently occupied by the Moore Manufacturing Company (3). Apparently, all by-products of the glue extraction process were sold as fertilizer. The only wastes generated were in the preparation of hides for glue extraction. The chrome-tanned hide material was treated with sulfuric acid to dissolve the chrome before extraction and the chrome solution was discharged into an area sewer line. Similar activities occurred under different ownership as far back as 1878 (1). There is no information available regarding the size of the facility.

Aerial photo interpretation by the Abandoned Site Program (ASP) of the Department of Health Services (DOHS) indicates potential ponds on-site, but a Site Inspection by ASP in 1981 did not locate them. The ponds could belong to neighboring Southern Pacific Railroad (SP) (2).

Apparent Problem:

Apparently unregulated processing of hides took place at the SCC site for over 80 years. There is uncertainty regarding the types and quantities of chemicals used. According to SCC "organics" were the only wastes generated, but a chromium/sulfuric acid solution was a waste product that may have been



Figure 1.0 Site Location Map

Stauffer Chemical Company

200 Industrial Way, Brisbane, CA



Thomas Brothers Map Scale: 1 Inch to 1/2 mile

released to the environment. Hydrogen peroxide and sodium hydroxide were also used but supposedly were never present as wastes. Upon closure of the site in 1963, 10 to 20 feet of imported fill material was used to prepare the site for a nearby freeway (1, 4).

Due to the lack of historical data, it is unclear whether observed ponds belonged to SCC or to SP. The ASP conducted a site inspection on July 14, 1981, and was unable to locate any ponds or landfills (5). The adjacent SP site is presently undergoing remedial investigation under the California Superfund authority (6).

- o Observed Release: There is no information available concerning an observed release.
- o Direct Contact/Fire and Explosion: The present threat from a direct contact or fire/explosion incident is unknown.
- o Waste Type/Quantity: According to SCC, the hydrogen peroxide and sodium hydroxide used in the glue extraction process were constituents of the fertilizer by-product. Also, the sulfuric acid/chromium solution was apparently discharged to a sewer line (1). Miscellaneous lab reagents were disposed of upon closure of operations (4).

Specific quantities of compounds discharged, leaked or spilled on-site are not known.

- o Groundwater: The uppermost aquifer is brackish. The aquifer used for drinking water is several hundred feet below ground surface. There is no evidence of inter-connectedness of aquifers. The only known wells within one mile of SCC are used to monitor the SP site under the California Superfund authority. It is not known if any industrial or municipal wells are within a three-mile radius. The City of Brisbane receives water from the Crystal Springs Reservoir, approximately ten miles to the south (9).

The net precipitation as calculated for the months November through April is 6 1/2 inches (7).

- o Surface Water: The nearest surface water is the San Francisco Bay, approximately 3/4 of a mile east of the site. The facility slopes very gradually toward the bay. It is not known whether the 10 to 20 feet of fill material used to cover the site in 1963 is still intact. Thus the potential for surface water runoff coming in contact with contaminants on the SCC site is unknown.

The one-year, 24-hour rainfall is approximately 3 inches (8).

c) Conclusions/Recommendations:

The property at 200 Industrial Way in Brisbane, California was owned by SCC from 1951 to 1963. Bones and hides were processed to obtain glue and fertilizer by-product. Similar activities occurred under different ownership as early as 1878. According to SCC, miscellaneous lab reagents were disposed on-site. Hydrogen peroxide, sodium hydroxide, sulfuric acid and chromium were also used on-site.

Upon closure of the site in 1963, about 10 to 20 feet of fill was used to cover the site for a road project. Any ponds that existed would have been covered and therefore would be difficult to locate.

No evidence to support an observed release is available. The groundwater below SCC is brackish and there is no evidence to support inter-connectedness of aquifers. The nearest surface water, the San Francisco Bay, is 3/4 of a mile away.

FIT recommendations are as follows:

It appears that this site is an unlikely candidate for inclusion on the CERCLA National Priorities List due to the lack of a target population. However, SCC should be considered for a low priority Site Inspection due to the lack of information regarding the historical operations and waste management practices.

2. FIT Review/Concurrence:

John Mac 2/2/87

3. EPA Recommendation For Further Action:

4. Response Termination: No Further Action ____; Active ____;
Pending ____.

Justification:

P.A./S.I. CONTACT LOG

Facility Name: Stauffer Chemical Company
Facility ID: CAD980636948

Name	Affiliation	Phone #	Date	Information
JoAnne Cox	RWQCB-Oakland	464-1255	12/16/86	No file exists for Brisbane site.
Gene Boyer	DOHS-Emergency	540-2043	12/22/86	No results available from ASP sampling.
Denise Kato	DOHS-Emergencyville	540-2043	1/9/87	See Contact Report.
Denise Kato	DOHS-Emergencyville	540-2043	1/23/87	See Contact Report.
Robin Breuer	RWQCB	464-1255	1/23/87	No wells within 1 mile radius. Drinking water aquifer is several hundred feet deep.
Carl Wilcox	Department of Fish and Game	(707) 944-2011	1/28/87	Wetlands on east side of Bay, no endangered species.

CONTACT REPORT

AGENCY: Department of Health Services
ADDRESS: Emeryville, CA
PERSON CONTACTED: Denise Kato
PHONE: 540-3414
FROM: Matt Lacey
TO: File
DATE: 1/23/87
SUBJECT: Stauffer Chemical Company

After attempting to score the adjacent Southern Pacific Railroad yard on the MITRE scoring package, it was determined that the aquifer of concern is brackish and is not used for groundwater. There is no evidence of inter-connectedness of aquifers.

CONTACT REPORT

AGENCY: DOHS - Emeryville
ADDRESS: Emeryville CA
PERSON CONTACTED: Denise Kato
PHONE: 540-3414
FROM: Matt Lacey
TO: File
DATE: 1/9/87
SUBJECT: Stauffer Chemical Company

Stauffer Chemical Company was not considered as part of the Southern Pacific (SP) Railroad yard for RI/FS purposes. They were unable to locate any ponds or any landfill. The oil tank referred to in the ASP site inspection is located on SP property.