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**VIA REGISTERED MAIL - -
RETURN RECEIPT REQUESTED**

December 15, 2010

Interim General Manager and
Board of Directors
Alameda-Contra Costa County Transit District
1600 Franklin Street, 10th Floor
Oakland, CA 94612

**Re: Notice of Violations and Intent to File Suit under the Resource
Conservation and Recovery Act**

**TO: Interim General Manager, Board Members, Owners, Site Managers and other
Responsible Parties:**

NOTICE

On behalf of Northern California River Watch ("River Watch"), I am providing statutory notification to the Alameda-Contra Costa County Transit District ("AC Transit") of its continuing and ongoing violations of the Federal Resource Conservation and Recovery Act of 1976, 42 U.S.C. §§ 6901 *et seq.*, ("RCRA"), in conjunction with AC Transit's continuing operations as a transit company, and in conjunction with unauthorized petroleum hydrocarbon releases and inadequate site cleanup requirements at the two sites further identified in the BACKGROUND section of this Notice. AC Transit is the current owner and operator of each of the sites so identified and has been the owner for many years. River Watch contends that AC Transit has an ongoing responsibility for existing contamination at each of the sites due to past and present releases of highly toxic substances such as benzene and toluene. AC Transit also bears responsibility for site remediation pursuant to the provisions of the RCRA due to its ownership of the real property upon which the sites are situated.

River Watch hereby notifies AC Transit that at the expiration of the appropriate notice periods under the RCRA, River Watch intends to commence a civil action against AC Transit on the following grounds:

1. AC Transit's use and storage of petroleum products at the two sites identified in this Notice has violated and continues to violate permits, standards, regulations, conditions, requirements and/or prohibitions effective pursuant to the RCRA regarding storage of petroleum in underground storage tanks ("USTs") (42 U.S.C. § 6972 (a)(1)(A));
2. AC Transit's operations at the two sites identified in this Notice have caused petroleum contamination of soil and groundwater which presents an imminent and substantial endangerment to human health and the environment (42 U.S.C. § 6972 (a)(1)(B)); and,
3. AC Transit's past and current operations at the two sites identified in this Notice violates the provisions of RCRA subchapter III (Subtitle C) which governs the handling of hazardous wastes. River Watch contends AC Transit has inadequately maintained records of the manner in which its fuels and/or its hazardous wastes have been treated, stored and/or disposed of; has inadequately monitored, reported and/or complied with existing regulations concerning its fuels and/or its hazardous wastes; has inadequately provided storage facilities for its fuels and wastes; and, in the past has not developed adequate contingency plans for effective action to minimize damage from the unauthorized releases of hazardous contaminants – all of which has presented and continues to present a substantial endangerment to human health and to the environment.

BACKGROUND

I. AC Transit Bus Maintenance Facility 1100 Seminary Avenue, Oakland, California

This AC Transit facility known as Division 4 is located on the southeastern corner of Seminary Avenue and San Leandro Avenue, and is utilized for the storage and maintenance of AC Transit buses. The facility contains a vehicle maintenance building, vehicle washing facility, parking garage, generator building, lift station, and a service building. The site also contains two large areas of former UST sites, known as Tank Farm No. 1 (east of the maintenance building), and Tank Farm No. 2 (north of the maintenance building). All USTs at this facility had been removed as of March of 2005.

Soil and groundwater contamination was discovered at the site following an unauthorized petroleum hydrocarbon release from AC Transit operations sometime in late 1986. In January of 1996, during a tank system upgrade, separate phase hydrocarbons (“SPH” or free product) were discovered in underlying soils.

Free product continued to exist in soil and groundwater at least until groundwater monitoring in November of 2008 (MW-2), and at the same time, fuel odors were noted in the water from wells MW-1, MW-3 and MW-11. On the basis of records available to River Watch at this time, it appears some oil skimming of free product may have been conducted, but no other methods of remediation have been implemented.

Depth to groundwater at this location is between 2.50 and 4.60 feet. Groundwater flow is west at a gradient of 0.35 ft. per 100 lineal ft. There are only six active monitoring wells at this site.

As of the latest monitoring reports River Watch has reviewed, high concentrations of petroleum hydrocarbons are present beneath this property and presumably adjacent to the site. As noted above, the hydrocarbon plume has not been fully delineated in spite of the length of time since the initial release. Based upon the most currently available sampling records (November of 2009), well monitoring reflects contaminant levels as follows: TPHg levels as high as 45,200 ug/l; TPHd as high as 35,600 ug/l; and ethylbenzene as high as 300 ug/l. These contaminant values have not been appreciably decreasing over time.

At the present time, over 24 years from the initial release of contaminants, the pollution of soil and groundwater remains almost completely unremediated. According to the latest documentation from records on file at the Regional Water Quality Control Board (“RWQCB”), the contaminant plume at the site has not been adequately characterized, and there is no end in sight for the engineering work which needs to be accomplished. In addition to a complete delineation of the contaminant plume, River Watch believes AC Transit must take proactive efforts to protect against aquifer and surface stream impact from this plume, as well as conduct current sensitive receptor and preferential pathway surveys.

On the basis of the current condition of this site, River Watch believes the following remediation work must be implemented immediately:

1. Complete delineation of the site for the purpose of enabling any remediation work to proceed;
2. Initiation of immediate vapor intrusion testing in each of the areas above the plume to determine whether employees of AC Transit and/or nearby residents are exposed to injurious levels of hydrocarbon, benzene or other toxic vapors;

3. Initiation of active remediation work as soon as possible to reduce any threat of further migration of contaminants into soil, groundwater and/or surface water;
4. Consideration of over-excavation to eliminate lingering sources of NAPL, MTBE, and petroleum hydrocarbon constituents from migrating into offsite groundwater and surface water;
5. Completion of current sensitive receptor surveys to outline and prevent the threats to offsite surface water and local water supply wells;
6. Completion of preferential pathway studies to determine whether there are conduits, sewer lines, storm drains, gravel lenses or other avenues by which hydrocarbons and constituents may be migrating offsite;
7. Completion of a current aquifer profile to determine whether the plume has impacted any underlying aquifer which is in communication with groundwater under the site; and,
8. Current residual mass calculations which will allow the measurement of remediation progress once removal processes are initiated.

II. AC Transit Facility 1177 47th Street, Emeryville, California

This facility known as Division 2 is located on the city block bound by 47th Street on the north, 45th Street on the south, San Pablo Boulevard on the east and Doyle Street on the west. The facility is used for the storage and maintenance of AC Transit buses and contains a vehicle maintenance building, vehicle washing facility, parking garage, emergency generator building, tire building, service building, fueling island, and storm water treatment facilities. The site also contains two areas of former UST sites known as Tank Farm No. 1 (at the northeastern corner of the property near the fuel dispenser islands) and Tank Farm No. 2 (near the center of the property near the maintenance building). Six USTs at this facility were removed as of December of 1999, leaving a 550 gallon UST still in use near the emergency generator.

Soil and groundwater contamination was discovered following an unauthorized petroleum hydrocarbon release from AC Transit operations in November of 1986. Monitoring wells were installed by 1989. There are sixteen active monitoring wells at this site. In 2003 SPH was detected. As of 2006 additional site characterization was conducted to determine the extent of SPH migration offsite.

Free product (free phase hydraulic oil) continues to exist in soil and groundwater in the vicinity of MW-13. In 2002 the thickness of the product in MW-13 was as much as seven feet, apparently due to leakage from a hydraulic hoist. On the basis of records available to River Watch at this time, it appears some oil skimming of free product has been conducted, but no other methods of remediation have been implemented.

Depth to groundwater at this location is between 2.80 and 10.80 feet. Groundwater flow is west at a gradient of 2.9 ft. per 100 lineal ft.

As of the latest monitoring reports reviewed by River Watch, high concentrations of petroleum hydrocarbons are present beneath the property (at MW-13) and may migrate west of the site via groundwater. Based upon the most currently available sampling records (May of 2010), well monitoring reflects TPHd levels as high as 255 ug/l, and MTBE levels downgradient from the site are slightly above State Maximum Contaminant Levels. However, free product levels at MW-13 are currently at a thickness of 0.34 feet. Despite monthly free product removal, the persistence of free product remains problematic.

At the present time, over 24 years from the initial release of contaminants, the pollution of the soil and groundwater remains unremediated. Engineering reports document only that monthly efforts to remove the free product is occurring. According to the latest documentation from records on file with the RWQCB, the contaminant plume has not been adequately characterized, and no remediation work appears to be planned. In addition to a complete delineation of the contaminant plume, River Watch believes AC Transit must take proactive efforts to protect against aquifer and surface stream impact from this plume, as well as conduct current sensitive receptor and preferential pathway surveys.

On the basis of the current condition of this site, River Watch believes the following remediation work must be implemented immediately:

1. Complete delineation of the site for the purpose of enabling any remediation work to proceed;
2. Initiation of active remediation work as soon as possible to reduce any threat of further migration of contaminants into soil, groundwater and/or surface water;
3. Consideration of over-excavation in the vicinity of MW-13 to eliminate lingering sources of NAPL, MTBE, and petroleum hydrocarbon constituents from migrating into offsite groundwater and surface water;

4. Completion of a current sensitive receptor survey to outline and prevent the threats to offsite surface water and local water supply wells. (Note: A survey was conducted in 2006, finding approximately 338 wells within a ½ mile radius of the site. None of these wells seem to have been the subject of testing to determine whether contamination from this site may have impacted those that lie downgradient from the site);
5. Completion of preferential pathway studies to determine whether there are conduits, sewer lines, storm drains, gravel lenses or other avenues by which hydrocarbons and constituents may be migrating offsite;
6. Completion of a current aquifer profile to determine whether the plume has impacted any underlying aquifer that communicates with groundwater under the site; and,
7. Current residual mass calculations which will allow the measurement of remediation progress once removal processes are initiated.

REGULATORY STANDARDS

The goals of the RCRA are the protection of the public and the environment from harm caused by waste storage and disposal, and to mandate the proper remediation of soil and groundwater which has been contaminated by hazardous waste and hazardous products, including petroleum hydrocarbons and gasoline formula constituents. The RCRA is a strict liability statute with a statute of limitations of five years. Pursuant to the RCRA, California has enacted laws and regulations which must be observed in conjunction with the RCRA provisions.

California's "Water Quality Objectives" exist to ensure protection of the beneficial uses of water. Several beneficial uses of water exist, and the most stringent water quality objectives for protection of all beneficial uses are selected as the protective water quality criteria. Alternative cleanup and abatement actions need to be considered which evaluate the feasibility of, at a minimum: (1) cleanup to background levels, (2) cleanup to levels attainable through application of best practicable technology, and (3) cleanup to protective water quality criteria levels. Existing and potential beneficial uses of area groundwater include domestic, agricultural, industrial and municipal water supply.

The RWQCB has adopted a Water Quality Control Plan or Basin Plan which designates all surface and groundwater within the North Coast and San Francisco Bay regions as capable of supporting domestic water supply. The RWQCB has adopted Maximum Contaminant Levels ("MCLs") and/or Water Quality Objectives ("WQOs") for all the pollutants identified in this Notice.

VIOLATIONS

I. Violations of Permits, Standards and Regulations - 42 U.S.C. § 6972(a)(1)(A)

AC Transit is in violation of provisions of the RCRA including, but not limited to, provisions governing general operating requirements for hazardous chemicals, release detection and prevention requirements, release reporting and investigation requirements, and release response and corrective action requirements. The contaminant levels in groundwater at the two sites identified in this Notice are significantly greater than the allowable MCLs and/or WQOs for said constituents. AC Transit has failed to prevent a release, failed to properly detect and monitor releases, failed to properly report and keep records releases and failed to take proper corrective action.

II. Creating Imminent and Substantial Endangerment - 42 U.S.C. § 6972(a)(1)(B)

AC Transit is responsible for the high levels of hydrocarbons as well as many other dangerous chemicals in groundwater in amounts significantly greater than the allowable MCL and/or WQO for said constituents. The concentration of these pollutants at the two sites identified in this Notice creates an imminent and substantial endangerment to public health and the environment.

The violations alleged in this Notice are knowing and intentional in that AC Transit has used, dumped, and failed to clean up these contaminants and dangerous chemicals which are known to contain hazardous substances; and, has intended that these materials are and will be used to implement its transit operations. AC Transit has known of the contamination at the two sites identified in this Notice for decades, and has also known that failing to promptly remediate the pollution allows the contamination to migrate through soil and groundwater and/or into the San Francisco Bay, and to continually contaminate and re-contaminate actual and potential beneficial uses such as municipal supply.

III. Mishandling of Hazardous Waste - 42 U.S.C. §§ 6924 et seq.

Since approximately 1986 AC Transit has operated its transit sites identified in this Notice and has used and/or stored hazardous chemicals and materials at those sites in a manner which has allowed significant quantities of hazardous constituents to be discharged to soil and groundwater beneath the sites and into the surrounding environment. Contaminant levels in groundwater at the sites are significantly greater than the allowable MCLs and/or WQOs for the hydrocarbons and hydrocarbon constituents noted above.

River Watch alleges that AC Transit has, for five years up to the date of this notice, engaged in the following activities or failures in violation of the RCRA's waste handling provisions:

1. Failed to adequately maintain records of the hazardous wastes identified in this Notice which were treated, stored or otherwise disposed of on or offsite (42 U.S.C. §6924(a)(1));
2. Failed to satisfactorily monitor, inspect, and report in accordance with provisions of the RCRA (42 U.S.C. §6924(a)(2));
3. Failed to adequately treat, store or properly dispose of the hazardous wastes found at the sites identified in this Notice 42 U.S.C. §6924(a)(3)0;
4. Failed to adequately locate, design and construct hazardous waste treatment, storage or disposal facilities (42 U.S.C. §6924(a)(4)); and,
5. Failed to properly implement contingency plans for effective action to minimize unanticipated damage from treatment, storage or disposal of the hazardous wastes found at the sites identified in this Notice (42 U.S.C. §6924(a)(5)).

AC Transit has either failed to properly label, track and/or report the type, quantity or disposition of fuels and/or waste from the sites, or has failed to use a manifest system to ensure that lost fuels and/or the waste generated is properly handled, stored, treated or disposed of. AC Transit's mishandling of its fuels and/or its hazardous wastes in violation of Subchapter C of the RCRA has created and is creating an imminent and substantial endangerment to human health and/or the environment.

IV. Unpermitted Handling, Treatment, Storage, Transportation and/or Disposal of Hazardous Waste - 42 U.S.C. § 6925

River Watch alleges that AC Transit has, for five years up to the date of this Notice, engaged in the following activities or failures in violation of the RCRA's waste handling provisions:

1. AC Transit's deposition and maintenance of hazardous waste as described herein has caused and continues to cause the generation and discharge of hazardous waste to the environment;
2. AC Transit has installed and maintained a system of conveyances to dispose of hazardous materials generated and released from the sites identified in this Notice;

3. AC Transit does not possess permits for the handling, storage, treatment, transportation, and/or disposal of the hazardous or solid waste found at the sites identified in this Notice; and,
4. AC Transit's unpermitted handling, storage, treatment, transportation and/or disposal of its hazardous waste at the sites identified in this Notice violates RCRA § 3005, 42 U.S.C. § 6925;

Information currently available to River Watch indicates that AC Transit's handling, treatment, storage, transportation, and/or disposal of its hazardous waste in violation of RCRA § 3004 has occurred every day for at least five years prior to the date of this Notice, or on numerous separate occasions, and, that those violations are continuing.

V. Prohibition Against Open Dumping -42 U.S.C. § 6945

River Watch alleges that AC Transit has, for five years prior to the date of this Notice, engaged in the following activities or failures in violation of the RCRA's waste handling provisions:

1. Engaged in open dumping by its discharge of hazardous waste to open ground where said waste will contaminate and has contaminated the soils, groundwater and surface waters as described in this Notice;
2. The two sites identified in this Notice do not qualify as landfills under 42 U.S.C. § 6944, and do not qualify as facilities for the disposal of hazardous waste;
3. AC Transit has no RCRA-authorized permit for the disposal, storage or treatment of solid or hazardous waste of the type currently and historically discharged at the sites identified in this Notice.

Information currently available to River Watch indicates that AC Transit's open dumping in violation of RCRA § 4005 has occurred every day for at least five years prior to the date of this Notice, and on numerous separate occasions, and that those violations are continuing.

Violations of the RCRA of the type alleged herein are a major cause of the continuing decline in water quality, environmental degradation, and bioaccumulation of harmful toxins in wildlife and humans in Northern California. With every discharge, groundwater and estuary waters are contaminated. These discharges can and must be controlled in order for the water supply to once again become safe.

In addition to the violations set forth above, this Notice is intended to cover all violations of the RCRA by AC Transit at the two sites identified in this Notice as evidenced by information which becomes available to River Watch after the date of this Notice.

NOTICE REQUIREMENTS

The RCRA requires that sixty days prior to the initiation of an action for violation of a permit, standard, regulation, condition, requirement, prohibition or order effective under the RCRA, a private party must give notice of the violation to the alleged violator, the Administrator of the Environmental Protection Agency and the State in which the violation is alleged to have occurred. If the alleged violator is an individual or corporation, service of notice shall be accomplished by registered mail addressed to, or by personal service upon, the owner or site manager, with a copy sent to the registered agent of the corporation. (See 42 U.S.C. § 6972(b)(1)(A)).

The RCRA also requires that a private party provide ninety days prior notice to the alleged violator, the Administrator of the Environmental Protection Agency and the State in which the violation is alleged to have occurred before initiating an action which alleges violations resulting in imminent and substantial endangerment to human health or the environment. (See 42 U.S.C. § 6972(b)(2)(A)). However, such an action may be brought immediately after such notification when a violation of Subtitle C of the RCRA (subchapter III 42 U.S.C. §§ 6921 - 6939e) is alleged.

Subchapter III of the RCRA requires hazardous waste to be tracked from the time of its generation to the time of its disposal, and further requires that such waste not be disposed of in any manner which may create a danger to human health or to the environment. As discussed above, AC Transit operates a transit service for Alameda and Contra Costa Counties. In implementing those operations, AC Transit has and is releasing hazardous toxins to the ground, groundwater, and potentially into surface waters of the San Francisco Bay.

River Watch alleges violations of Subchapter C (subchapter III) with regard to both a violation of a permit, standard, regulation, condition, requirement, prohibition or order effective under RCRA, as well as for creating an imminent and substantial endangerment to human health or the environment.

Under the RCRA, notice to a violator regarding an alleged violation of a permit, standard, regulation, condition, requirement, or order which has become effective under the RCRA shall include sufficient information to permit the recipient of the notice to identify the permit, standard, regulation, condition, requirement, or order which has allegedly been violated, the activity alleged to constitute a violation, the person or persons responsible for

the alleged violation, the date or dates of the violation (or reasonable range), and the full name, address, and telephone number of the person giving notice. Therefore, in compliance with the RCRA, River Watch provides the following information:

The standard, limitation, or order alleged to have been violated.

The RCRA, enacted in 1976, is a Federal law of the United States contained in 42 U.S.C. §§ 6901-6992k. Its goals are to protect the public from harm caused by hazardous waste disposal; to encourage reuse, reduction, and recycling; and, to clean up spilled or improperly stored wastes. The RCRA specifically protects groundwater.

The EPA's waste management regulations are codified at 40 C.F.R. §§ 239-282. Regulations regarding management of hazardous waste begin at 40 C.F.R. § 260. Pursuant to the RCRA, the State of California has enacted laws and promulgated regulations that are at least as stringent as the federal regulations.

AC Transit's tracking, manifesting, labeling, use, disposal, treatment, and storage of waste at the sites identified in the BACKGROUND section of this Notice, and the disposal of those wastes as described in this Notice has violated and continues to violate permits, standards, regulations, conditions, requirements and/or prohibitions effective pursuant to the RCRA regarding hazardous waste. (42 U.S.C. § 6972(a)(1)(A)).

AC Transit's operations at the sites identified in the BACKGROUND section of this Notice have caused contamination of soil, groundwater, surface waters and air, which contamination presents an imminent and substantial endangerment to human health and the environment. AC Transit owns or operates on-site dumps, discrete conveyances, preferential pathways or wells which have contributed to the transport, partial treatment, storage, or disposal of the hazardous wastes at the identified sites. (42 U.S.C. § 6972(a)(1)(B)).

The Activities Alleged to Constitute Violations

The narratives above describe with particularity the activities leading to violations. In summary, the RCRA requires that the environment and public be protected from the hazardous wastes generated by AC Transit. The Pollutants described in this Notice constitute hazardous waste under the RCRA, and are required to be managed so as to not cause endangerment to the public or the environment.

The liability of AC Transit stems from either its ownership or operation of the identified sites, or from activities conducted on the sites by AC Transit which violate the RCRA and have contributed to the past or present handling, storage, treatment, transportation, or disposal of any hazardous waste which, as noted above, may present an imminent and substantial endangerment to health or the environment.

The liability of AC Transit also stems from its ownership or operation of discrete conveyances, preferential pathways or wells which, as noted above, have caused pollutants to migrate and to be discharged to surface and groundwater via AC Transit's conduits, pipes, sewer lines, storm drains, utilities and the like, facilitating pollutant migration and discharge to waters of the State of California and the United States, and contributing to the past or present handling, storage, treatment, transportation, or disposal of any hazardous waste which may present an imminent and substantial endangerment to health or the environment.

River Watch contends, as noted herein, that AC Transit has inadequately maintained records of the manner in which its hazardous wastes have been treated, stored and/or disposed of; inadequately monitored, reported and/or complied with existing regulations concerning its wastes; inadequately provided storage facilities for its wastes; and in the past, has not developed adequate contingency plans for effective action to minimize damage from the unauthorized releases of hazardous contaminants – all of which presents a substantial endangerment to human health and to the environment. River Watch contends AC Transit does not possess RCRA-authorized permits for its handling of hazardous materials.

The discharger responsible for the alleged violation.

The discharger responsible for the alleged violations as described in this Notice is the Alameda-Contra Costa County Transit District referred to as "AC Transit" throughout this Notice.

The date or dates of violation or a reasonable range of dates during which the alleged activities occurred.

RCRA is a strict liability statute with a statute of limitations of five years. Therefore, although violations of the RCRA by AC Transit at the sites identified in this Notice have occurred for more than five years, the range of dates covered by this Notice is December 15, 2005 through the date of this Notice. River Watch will from time to time update and supplement this Notice to include all violations of the RCRA by AC Transit which occur after the date of this Notice. The majority of the violations identified herein are continuous. Therefore each day in which contaminants have remained in soils and groundwater at the identified sites, or where cleanup requirements have not been met is a separate violation.

River Watch believes all violations set forth in this Notice are continuing in nature, or will likely continue after the filing of a lawsuit. Specific dates of other violations are evidenced in AC Transit's own records (or lack thereof) or files and records of other regulatory agencies including, but not limited to the RWQCB, GeoTracker, and the Alameda County Health Department.

The full name, address, and telephone number of the person or entity giving notice.

The entity giving notice is Northern California River Watch, 500 North Main Street, Suite 110, Sebastopol, CA 95472; telephone and facsimile 707-824-4372; E-mail US@ncriverwatch.org. River Watch is a non-profit corporation organized under the laws of the State of California. River Watch is dedicated to the protection and enhancement of the waters of the State of California including all rivers, creeks, streams and groundwater in Northern California.

River Watch has retained legal counsel with respect to the issues raised in this Notice as regards AC Transit and the sites identified in the BACKGROUND section of this Notice. All communications regarding the same should be addressed to:

Jack Silver, Esquire
Law Offices of Jack Silver
P.O. Box 5469
Santa Rosa, CA 95402-5469
Tel. 707-528-8175 / Fax. 707-528-8675

CONCLUSION

The violations of AC Transit as set forth in this Notice affect the economic stability, physical health and aesthetic enjoyment of River Watch and its members who reside and recreate in the affected watershed areas. Members of River Watch may use the watershed for domestic water supply, agricultural water supply, recreation, sports, fishing, swimming, shellfish harvesting, hiking, photography, nature walks and the like. Their health, use and enjoyment of this natural resource are conditions specifically impaired by the violations of the RCRA described in this Notice.

River Watch believes this Notice sufficiently states grounds for filing suit under the statutory and regulatory provisions of the RCRA. River Watch is willing to discuss effective remedies for the violations referenced herein. If AC Transit wishes to pursue such discussions in the absence of litigation, it is encouraged to initiate discussions immediately. River Watch will not delay the filing of a lawsuit if discussions have not commenced within a brief period of time following the receipt of this Notice.

Very truly yours,


Jack Silver

JS:lhm

cc: Administrator
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California Attorney General's Office
California Department of Justice
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