

RECEIVED

By Alameda County Environmental Health at 2:08 pm, Dec 20, 2013

December 13, 2013

Mark Detterman
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6540

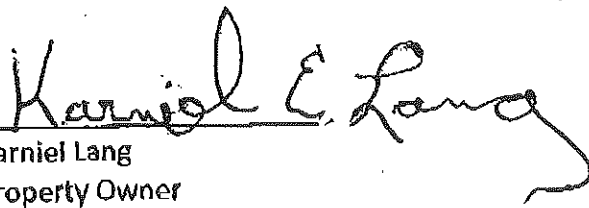
Re: Well Destruction Report and Closure Request, December 2013
Ras-Co Manufacturing
RWQCB Case #01-2121
ACEH Case #RO0000164
413 West Sunset Blvd
Hayward, CA

Dear Mr. Detterman,

I have directed Applied Water Resources (AWR) to provide, on our behalf, professional environmental consulting services to the best of their ability. To the best of my knowledge the information in this report is accurate and all local Agency and/or Regional Water Quality Control Board regulations and guidelines have been followed.

This report was prepared by AWR and I have relied on their advice and assistance. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Sincerely,


Karniel Lang
Property Owner

Attachment: Report



December 13, 2013

Mark Detterman
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6540

Re: Well Destruction Report and Closure Request
Ras-Co Manufacturing
RWQCB Case #01-2121
ACEH Case #RO0000164
413 West Sunset Blvd
Hayward, CA

Dear Mr. Detterman,

Applied Water Resources (AWR) on behalf of our client, has completed the destruction of the monitoring and former agricultural well at 413 West Sunset Boulevard in Hayward, California. The well destruction occurred on August 15, 2013. The well closure was conducted following the Alameda County Environmental Health (ACEH) response letter dated April 23, 2013 to the State Water Resources Control Board regarding the intent to recommend closure for the listed site under the Low Threat Closure Policy described in a letter dated February 15, 2013.

The well destruction permits and DWR Well Completion Reports are enclosed with this letter. The completed DWR forms were sent to the Alameda County Water District on November 15, 2013. A copy of the State Water Resources Control Board February 2013 report and the ACEH April 2013 response are also included for reference.

AWR, on behalf of the property owner, requests the site be closed under the Low Threat Closure Policy.

AWR looks forward to working with you on this project. Please contact me at 408.496.0801 or at kprice@erscorp.us if you have any questions or comments.

Best Regards
APPLIED WATER RESOURCES CORPORATION

Kendall W. Price CEG, REA
Principal Consultant/Regional Manager



Cc: Mr. Karniel Lang, RAS-CO Manufacturing

ATTACHMENT 1

Well Destruction Permit





Quick Links

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ONLINE SERVICES

[Public Works Agency](#)

WELLS PERMIT APPLICATION

PUBLIC WORKS AGENCY

Application Verification

Please verify that the following information is correct before submitting application for processing.

[Submit Application](#)

Application Summary

Project Total: \$ 794.00 Number of Types of Works Requesting Permit: 1

Project Info

[Edit](#)

Site City: Hayward Site Location Description: 4134 West Sunset Boulevard Hayward, CA 94541
 Start Date: 08/12/2013 Completion Date: 08/14/2013
 Property Owner Last Name: Lang First Name: Karniel
 Address: 20 Via Malero Dr, San Leandro CA 94580
 Phone Number: 510-278-2330 Email:

Client same as Property Owner

Type of Work Applied

[Edit](#)

• Well Destruction TEST 2 Wells - \$ 397.00 per well
 Driller: The Pressure Grout Co Driller License #: 267916 Drill Method: Tremie Grout with Cement (More than 30 ft in depth) Amount: \$ 794.00

Applicant Address

[Edit](#)

Applicant Business: AWR Corp Applicant Name: Kendall Price
 Address: 2314 Walsh Ave , Santa Clara CA 95951 E-Mail: kprice@erscorp.us
 Phone Number: 408-496-0801 Fax Num: 408-496-0806
 Contact Name: Kendall Price Contact E-Mail: kprice@erscorp.us
 Contact Phone: 408-496-0801 x22 Contact Cell Num: 408-220-4876

Payment Detail

[Edit](#)

Payment Method: VISA 4342562170341174 - CSC: 558 Expires: 05/16
 Name on Card: Kendall W. Price Billing Address: 22108 Olde Santa Cruz Hwy
 Los Gatos, California 95033

[Submit Application](#)

Questions on Public Works Wells Permit Applications?
E-mail us at: wells@acpwa.org

Alameda County Public Works Agency - Water Resources Well Permit



399 Elmhurst Street
Hayward, CA 94544-1395
Telephone: (510)670-6633 Fax:(510)782-1939

Application Approved on: 07/31/2013 By jamesy

Permit Numbers: W2013-0542 to W2013-0543
Permits Valid from 08/12/2013 to 08/14/2013

Application Id: 1375120806888
Site Location: 4134 West Sunset Boulevard

City of Project Site: Hayward

Project Start Date: Hayward, CA 94541
08/12/2013
Assigned Inspector: Contact James Yoo at (510) 670-6633 or jamesy@acpwa.org

Completion Date: 08/14/2013

Applicant: AWR Corp - Kendall Price
2314 Walsh Ave, Santa Clara, CA 95951
Property Owner: Karniel Lang
20 Via Matero Dr, San Leandro, CA 94580
Client: ** same as Property Owner **
Contact: Kendall Price

Phone: 408-496-0801

Phone: 510-278-2330

Phone: 408-496-0801 x22
Cell: 408-220-4876

Receipt Number: WR2013-0269	Total Due: \$794.00	
Payer Name : Kendall W. Price	Total Amount Paid: \$794.00	
	Paid By: VISA	PAID IN FULL

Works Requesting Permits:

Well Destruction-Monitoring - 1 Wells
Driller: The Pressure Grout Co - Lic #: 267916 - Method: tremi

Work Total: \$397.00

Specifications

Permit #	Issued Date	Expire Date	Owner Well Id	Hole Diam.	Casing Diam.	Seal Depth	Max. Depth	State Well #	Orig. Permit #	DWR #
W2013-0542	07/31/2013	11/10/2013	MW-1	8.00 in.	2.00 in.	5.00 ft	20.00 ft	0	99WR251	0

Specific Work Permit Conditions

1. Drilling Permit(s) can be voided/ cancelled only in writing. It is the applicant's responsibility to notify Alameda County Public Works Agency, Water Resources Section in writing for an extension or to cancel the drilling permit application. No drilling permit application(s) shall be extended beyond ninety (90) days from the original start date. Applicants may not cancel a drilling permit application after the completion date of the permit issued has passed.
2. Prior to any drilling activities, it shall be the applicant's responsibility to contact and coordinate an Underground Service Alert (USA), obtain encroachment permit(s), excavation permit(s) or any other permits or agreements required for that Federal, State, County or City, and follow all City or County Ordinances. No work shall begin until all the permits and requirements have been approved or obtained. It shall also be the applicants responsibilities to provide to the Cities or to Alameda County an Traffic Safety Plan for any lane closures or detours planned. No work shall begin until all the permits and requirements have been approved or obtained.
3. Compliance with the well-sealing specifications shall not exempt the well-sealing contractor from complying with appropriate State reporting-requirements related to well construction or destruction (Sections 13750 through 13755 (Division 7, Chapter 10, Article 3) of the California Water Code). Contractor must complete State DWR Form 188 and mail original to the Alameda County Public Works Agency, Water Resources Section, within 60 days. Include permit number and site map.
4. Applicant shall submit the copies of the approved encroachment permit to this office within 60 days.

Alameda County Public Works Agency - Water Resources Well Permit

5. Permittee shall assume entire responsibility for all activities and uses under this permit and shall indemnify, defend and save the Alameda County Public Works Agency, its officers, agents, and employees free and harmless from any and all expense, cost and liability in connection with or resulting from the exercise of this Permit including, but not limited to, property damage, personal injury and wrongful death.

6. Applicant shall contact James Yoo for an inspection time at 510-670-6633 at least five (5) working days prior to starting, once the permit has been approved. Confirm the scheduled date(s) at least 24 hours prior to drilling.

7. Permittee, permittee's contractors, consultants or agents shall be responsible to assure that all material or waters generated during drilling, boring destruction, and/or other activities associated with this Permit will be safely handled, properly managed, and disposed of according to all applicable federal, state, and local statutes regulating such. In no case shall these materials and/or waters be allowed to enter, or potentially enter, on or off-site storm sewers, dry wells, or waterways or be allowed to move off the property where work is being completed.

8. Remove the Christy box or similar structure.

Destroy well by grouting neat cement with a tremie pipe or pressure grouting (25 psi for 5min.) to the bottom of the well and by filling with neat cement to three (3-5) feet below surface grade. Allow the sealing material to spill over the top of the casing to fill any annular space between casing and soil.

After the seal has set, backfill the remaining hole with concrete or compacted material to match existing conditions.

9. Copy of approved drilling permit must be on site at all times. Failure to present or show proof of the approved permit application on site shall result in a fine of \$500.00.

Well Destruction-Water Supply - 1 Wells

Driller: The Pressure Grout Co. - Lic #: 267916 - Method: tremi

Work Total: \$397.00

Specifications

Permit #	Issued Date	Expire Date	Owner Well Id	Hole Diam.	Casing Diam.	Seal Depth	Max. Depth	State Well #	Orig. Permit #	DWR #
W2013-0543	07/31/2013	11/10/2013	UKN-1	12.00 in.	10.00 in.	0.00 ft	75.00 ft	0	0	0

Specific Work Permit Conditions

1. Compliance with the above well-sealing specifications shall not exempt the well-sealing contractor from complying with appropriate state reporting-requirements related to well destruction (Sections 13750 through 13755 (Division 7, Chapter 10, Article 3) of the California Water Code). Contractor must complete State DWR Form 188 and mail original to the Alameda County Public Works Agency, Water Resources Section, within 60 days, including permit number and site map.

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3. The sealing material shall be a neat cement mixture composed one sack of portland cement (94 lbs.) to five to seven gallons of clean water, or a sand-grout mixture with a minimum of eleven sacks of portland cement per cubic yard. The sand-grout mixture must be delivered by a cement-batch plant; mixing of sand-grout mixture on site will not be allowed. The sealing material in all cases shall be placed by means of a tremie pipe lowered to within three feet of the bottom of the well. The sealing material shall be lowered down through the tremie pipe and placed in one continuous operation

Alameda County Public Works Agency - Water Resources Well Permit

until the specified interval or well is filled. The end of the tremie pipe shall remain submerged in the sealing material at all times during placement.

4. Cement grout shall be placed by Tremie pipe. After the seal has set, backfill the remaining hole with concrete or compacted material to match existing.

5. Applicant shall contact James Yoo for an inspection time at 510-670-6633 at least five (5) working days prior to starting, once the permit has been approved. Confirm the scheduled date(s) at least 24 hours prior to drilling.

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Alameda County Public Works Agency - Water Resources Well Permit



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Application Id: 1375120806888
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City of Project Site: Hayward

Project Start Date: 08/12/2013

Completion Date: 08/14/2013

Assigned Inspector: Contact James Yoo at (510) 670-6633 or jamesy@acpwa.org

Extension Start Date: 08/15/2013

Extension End Date: 08/15/2013

Extension Count: 1

Extended By: jamesy

Applicant: AWR Corp - Kendall Price
2314 Walsh Ave, Santa Clara, CA 95951

Phone: 408-496-0801

Property Owner: Karniel Lang
20 Via Matero Dr, San Leandro, CA 94580

Phone: 510-278-2330

Client: ** same as Property Owner **

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Alameda County Public Works Agency - Water Resources Well Permit

4. Applicant shall submit the copies of the approved encroachment permit to this office within 60 days.
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6. Applicant shall contact James Yoo for an inspection time at 510-670-6633 at least five (5) working days prior to starting, once the permit has been approved. Confirm the scheduled date(s) at least 24 hours prior to drilling.
7. Permittee, permittee's contractors, consultants or agents shall be responsible to assure that all material or waters generated during drilling, boring destruction, and/or other activities associated with this Permit will be safely handled, properly managed, and disposed of according to all applicable federal, state, and local statutes regulating such. In no case shall these materials and/or waters be allowed to enter, or potentially enter, on or off-site storm sewers, dry wells, or waterways or be allowed to move off the property where work is being completed.
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After the seal has set, backfill the remaining hole with concrete or compacted material to match existing conditions.

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Specific Work Permit Conditions

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Alameda County Public Works Agency - Water Resources Well Permit

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7. After the seal has set, backfill the remaining hole with concrete or compacted material to match existing conditions.

8. 4 sack cement by batch plant approved for water well destruction.

ATTACHMENT 2

DWR Well Completion Forms



CONFIDENTIAL

STATE OF CALIFORNIA DWR
WELL COMPLETION REPORT
(WELL LOGS)

REMOVED

CONFIDENTIAL

STATE OF CALIFORNIA DWR
WELL COMPLETION REPORT
(WELL LOGS)

REMOVED

ATTACHMENT 3

State Water Resources Control Board Closure Recommendation for the listed site under the Low Threat Closure Policy



STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD

ORDER WQ 2013-0020-UST

In the Matter of Underground Storage Tank Case Closure

**Pursuant to Health and Safety Code Section 25299.39.2 and the Low Threat
Underground Storage Tank Case Closure Policy**

BY THE EXECUTIVE DIRECTOR¹:

Pursuant to Health and Safety Code section 25299.39.2, the Manager of the Underground Storage Tank Cleanup Fund (Fund) recommends closure of the underground storage tank (UST) case at the site listed below.² The name of the Fund claimant, the Fund claim number, the site name and the applicable site address are as follows:

RAS-CO Manufacturing Co.

Claim No. 10081

RAS-CO Manufacturing Co.

413 West Sunset Boulevard, Hayward

Alameda County Health Care Services Agency

I. STATUTORY AND PROCEDURAL BACKGROUND

Section 25299.39.2 directs the Fund manager to review the case history of claims that have been active for five years or more (five-year review), unless there is an objection from the UST owner or operator. This section further authorizes the Fund Manager to make recommendations to the State Water Resources Control Board (State Water Board) for closure of a five-year-review case if the UST owner or operator approves. In response to a recommendation by the Fund Manager, the State Water Board, or in certain cases the State Water Board Executive Director, may close a case or require the closure of a UST case. Closure of a UST case is appropriate where the corrective action ensures the protection of

¹ State Water Board Resolution No. (2012-0061) delegates to the Executive Director the authority to close or require the closure of any UST case if the case meets the criteria found in the State Water Board's Low Threat Underground Storage Tank Case Closure Policy adopted by State Water Board Resolution No. 2012-0016.

² Unless otherwise noted, all references are to the Health and Safety Code.

human health, safety, and the environment and where the corrective action is consistent with:

- 1) Chapter 6.7 of Division 20 of the Health and Safety Code and implementing regulations;
- 2) Any applicable waste discharge requirements or other orders issued pursuant to Division 7 of the Water Code; 3) All applicable state policies for water quality control; and 4) All applicable water quality control plans.

The Fund Manager has completed a five-year review of the UST case identified above, and recommends that this case be closed. The recommendation is based upon the facts and circumstances of this particular UST case. A UST Case Closure Review Summary Report has been prepared for the case identified above and the bases for determining compliance with the Water Quality Control Policy for Low-Threat Underground Storage Tank Case Closures (Low-Threat Closure Policy or Policy) are explained in the Case Closure Review Summary Report.

A. Low-Threat Closure Policy

In State Water Board Resolution No. 2012-0016, the State Water Board adopted the Low Threat Closure Policy. The Policy became effective on August 17, 2012. The Policy establishes consistent statewide case closure criteria for certain low-threat petroleum UST sites. In the absence of unique attributes or site-specific conditions that demonstrably increase the risk associated with residual petroleum constituents, cases that meet the general and media-specific criteria in the Low-Threat Closure Policy pose a low threat to human health, safety and the environment and are appropriate for closure under Health and Safety Code section 25296.10. The Policy provides that if a regulatory agency determines that a case meets the general and media-specific criteria of the Policy, then the regulatory agency shall notify responsible parties and other specified interested persons that the case is eligible for case closure. Unless the regulatory agency revises its determination based on comments received on the proposed case closure, the Policy provides that the agency shall issue a closure letter as specified in Health and Safety Code section 25296.10. The closure letter may only be issued after the expiration of the 60-day comment period, proper destruction or maintenance of monitoring wells or borings, and removal of waste associated with investigation and remediation of the site.

Health and Safety Code section 25299.57, subdivision (l)(1) provides that claims for reimbursement of corrective action costs that are received by the Fund more than 365 days after the date of a closure letter or a Letter of Commitment, whichever occurs later, shall not be reimbursed unless specified conditions are satisfied. A Letter of Commitment has already been issued on the claim subject to this order and the respective Fund claimant, so the 365-day

timeframe for the submittal of claims for corrective action costs will start upon the issuance of the closure letter.

II. FINDINGS

Based upon the UST Case Closure Review Summary Report prepared for the case attached hereto, the State Water Board finds that corrective action taken to address the unauthorized release of petroleum at the UST release site identified as:

Claim No. 10081

RAS-CO Manufacturing Co.

ensures protection of human health, safety and the environment and is consistent with Chapter 6.7 of Division 20 of the Health and Safety Code and implementing regulations, the Low-Threat Closure Policy and other water quality control policies and applicable water quality control plans.

Pursuant to the Low-Threat Closure Policy, notification has been provided to all entities that are required to receive notice of the proposed case closure, a 60-day comment period has been provided to notified parties, and any comments received have been considered by the Board in determining that the case should be closed.

The UST case identified above may be the subject of orders issued by the Regional Water Quality Control Water Board (Regional Water Board) pursuant to Division 7 of the Water Code. Any orders that have been issued by the Regional Water Board pursuant to Division 7 of the Water Code, or directives issued by a Local Oversight Program agency for this case should be rescinded to the extent they are inconsistent with this Order.

III. ORDER

IT IS THEREFORE ORDERED that:

- A. The UST case identified in Section II of this Order, meeting the general and media-specific criteria established in the Low-Threat Closure Policy, be closed in accordance with the following conditions and after the following actions are complete. Prior to the issuance of a closure letter, the Fund claimant is ordered to:

1. Properly destroy monitoring wells and borings unless the owner of real property on which the well or boring is located certifies that the wells or borings will be maintained in accordance with local or state requirements;
 2. Properly remove from the site and manage all waste piles, drums, debris, and other investigation and remediation derived materials in accordance with local or state requirements; and
 3. Within six months of the date of this Order, submit documentation to the regulatory agency overseeing the UST case identified in section II of this Order that the tasks in subparagraphs (1) and (2) have been completed.
- B. The tasks in subparagraphs (1) and (2) of Paragraph (A) are ordered pursuant to Health and Safety Code section 25296.10 and failure to comply with these requirements may result in the imposition of civil penalties pursuant to Health and Safety Code section 25299 subdivision (d)(1). Penalties may be imposed administratively by the State Water Board or Regional Water Board.
- C. Within 30 days of receipt of proper documentation from the Fund claimant that requirements in subparagraphs (1) and (2) of Paragraph (A) are complete, the regulatory agency that is responsible for oversight of the UST case identified in Section II of this Order shall notify the State Water Board that the tasks have been satisfactorily completed.
- D. Within 30 days of notification from the regulatory agency that the tasks are complete pursuant to Paragraph (C), the Deputy Director of the Division of Financial Assistance shall issue a closure letter consistent with Health and Safety Code, section 25296.10, subdivision (g) and upload the closure letter and UST Case Closure Review Summary Report to GeoTracker.
- E. As specified in Health and Safety Code section 25299.39.2 subdivision (a) (2), corrective action costs incurred after a recommendation of closure shall be limited to \$10,000 per year unless the Board or its delegated representative agrees that corrective action in excess of that amount is necessary to meet closure requirements, or additional corrective actions are necessary pursuant to section 25296.10 subdivision (a) and (b). Pursuant to section 25299.57, subdivision (l) (1), and except in specified circumstances,

RAS-CO Manufacturing Co.

all claims for reimbursement of corrective action costs must be received by the Fund within 365 days of issuance of the closure letter in order for the costs to be considered.

- F. Any Regional Water Board or Local Oversight Program Agency directive or order that directs corrective action or other action inconsistent with case closure for the UST case identified in Section II is rescinded, but only to the extent the Regional Water Board order or Local Oversight Program Agency directive is inconsistent with this Order.

Thomas Howard
Executive Director

5/13/13
Date

State Water Resources Control Board

UST CASE CLOSURE REVIEW SUMMARY REPORT

Agency Information

Agency Name: Alameda County Health Care Services Agency (County)	Address: 1131 Harbor Bay Parkway Alameda, CA 94502
Agency Caseworker: Mark Detterman	Case No.: RO0000164

Case Information

USTCF Claim No.: 10081	Global ID: T0600101947
Site Name: RAS-CO Manufacturing Co.	Site Address: 413 West Sunset Bl., Hayward, CA 94541
Responsible Party (RP): RAS-CO Mfg. Co., Attn: Karniel Lang	Address: 413 West Sunset Bl., Hayward, CA 94541
USTCF Expenditures to Date: \$34,789	Number of Years Case Open: 18

URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0600101947

Summary

The Low-Threat Underground Storage Tank (UST) Case Closure Policy (Policy) contains general and media-specific criteria, and cases that meet those criteria are appropriate for closure pursuant to the Policy. This case meets all of the required criteria of the Policy. A summary evaluation of compliance with the Policy is shown in **Attachment 1: Compliance with State Water Board Policies and State Law**. The Conceptual Site Model upon which the evaluation of the case has been made is described in **Attachment 2: Summary of Basic Case Information (Conceptual Site Model)**. Highlights of the case follow:

The Site is located at 413 West Sunset Boulevard in Hayward and is occupied by the RAS-CO Manufacturing Company building and yard as well as a house and garage. Two USTs were removed in November 1994 and over-excavation of affected soil to a depth of 21 feet. In 1999, one monitoring well was installed in the source area and sampled. Groundwater analytical results report non-detect concentrations of contaminants in groundwater.

The petroleum release was limited to the shallow soil and groundwater. No detectable concentrations of contaminants remain in the groundwater. There are no public supply wells regulated by the California Department of Public Health (CDPH) located within 250 feet of the Site. An on-Site domestic irrigation well (Ag Well) is located approximately 50 west of the former UST excavation. A door-to-door well survey was conducted by ERS in 2012. No additional water supply wells have been identified within 250 feet of the former source area. In 1996 a concentration of 1,200 micrograms per liter ($\mu\text{g/L}$) of methyl tert-butyl ether (MTBE) was reported in the on-site domestic irrigation well. Subsequent sampling in 1999 and 2010 showed no detections of any constituents including MTBE in either the source area well or the on-site domestic irrigation well. The affected groundwater is not currently being used as a source of drinking water, and it is highly unlikely that the affected groundwater will be used as a source of drinking water in the foreseeable future. Other designated beneficial uses of groundwater are not threatened. Water is provided to water users near the Site by the East Bay Municipal Utilities District (EBMUD). Additional corrective action will not likely change the conceptual model. The corrective action performed is protective of human health, safety, and the environment.

Rationale for Closure under the Policy

- General Criteria: The case meets all eight Policy general criteria.
- Groundwater Specific Criteria: There are not sufficient mobile constituents (leachate, vapors, or light non-aqueous liquids [LNAPL]) to cause groundwater to exceed the groundwater criteria in this Policy.
- Vapor Intrusion to Indoor Air: The case meets Policy Criterion 2a. Site-specific conditions at the release site satisfy all of the characteristics and criteria of Scenario 3. Benzene concentrations are less than 100 milligrams per kilogram (mg/kg) in the upper 10 feet of soil (the bioattenuation zone) and groundwater reports benzene concentrations less than 100 micrograms per liter ($\mu\text{g/L}$).
- Direct Contact and Outdoor Air Exposure: The case meets Policy Criterion 3a. Maximum concentrations in soil are less than those in Policy Table 1 and the concentration limits for Utility Worker are satisfied. There are no soil sample results in the case record for naphthalene. However, the relative concentration of naphthalene in soil can be conservatively estimated using the published relative concentrations of naphthalene and benzene in gasoline. Taken from Potter and Simmons (1998), gasoline mixtures contain approximately 2 percent benzene and 0.25 percent naphthalene. Therefore, benzene can be directly substituted for naphthalene concentrations with a safety factor of eight. Benzene concentrations from the Site are below the naphthalene thresholds in Policy Table 1. Therefore, the estimated naphthalene concentrations meet the thresholds in Table 1 and the Policy criteria for direct contact by a factor of eight. It is highly unlikely that naphthalene concentrations in the soil, if any, exceed the threshold.

Objections to Closure and Response

The County objects to UST case closure for this case because:

- Lateral and vertical extent of contamination is undetermined; onsite domestic irrigation well is possibly impacted but screen interval is undetermined.
RESPONSE: Concentrations in groundwater in both the source area well (MW-1) and the onsite domestic irrigation well are at non-detect levels. There is no groundwater contaminant plume at the Site; this is a soils-only case.
- Site Characterization has not been completed; potential risks and threats have not been fully evaluated.
RESPONSE: Further characterization is unnecessary. There is no groundwater contaminant plume. Shallow soil concentrations are non-detect.
- Well survey and conduit survey have not been conducted.
RESPONSE: A well and conduit survey was issued in May 2012 and is available on GeoTracker. There are not sufficient mobile constituents to cause groundwater to exceed the groundwater criteria; thus, nearby wells are not threatened. This is a soils-only case.
- Onsite domestic irrigation well is a possible receptor; additional work is needed to determine if other vicinity residential/agricultural wells exist.
RESPONSE: In 1996 a concentration of 1,200 micrograms per liter ($\mu\text{g/L}$) of methyl tert-butyl ether (MTBE) was reported in the domestic irrigation well. Subsequent sampling in 1999 and 2010 showed no detections of any constituents including MTBE. Also, no concentrations of the constituents of concern have been reported in monitoring well MW-1, located in the former source area. There are no additional wells identified within 250 feet from the former source area. There are not sufficient mobile constituents to cause groundwater to exceed the groundwater criteria; thus, nearby wells are not threatened. This is a soils-only case.
- Responsible Party has not responded to requests for work or Notice of Violation.
RESPONSE: The case meets the Policy criteria for closure. Additional work is not necessary.

- Site not claimed in Geotracker, so well data are not uploaded. Well not surveyed to Geotracker standards.

RESPONSE: Review of GeoTracker shows that Site has been claimed. Available data are sufficient for an appropriate site conceptual model. Further data collection is not necessary.

Determination

Based on the review performed in accordance with Health & Safety Code Section 25299.39.2 subdivision (a), the Fund Manager has determined that closure of the case is appropriate.

Recommendation for Closure

Based on available information, residual petroleum hydrocarbons at the Site do not pose significant risks to human health, safety, or the environment, and the case meets the requirements of the Policy. Accordingly, the Fund Manager recommends that the case be closed. The State Water Board is conducting public notification as required by the Policy. Alameda County has the regulatory responsibility to supervise the abandonment of monitoring wells.

Lisa Babcock

Lisa Babcock, P.G. 3939, C.E.G. 1235

2/25/13

Date

Prepared by: Roger Hoffmore, P.G.

ATTACHMENT 1: COMPLIANCE WITH STATE WATER BOARD POLICIES AND STATE LAW

The case complies with the State Water Resources Control Board policies and state law. Section 25296.10 of the Health and Safety Code requires that sites be cleaned up to protect human health, safety, and the environment. Based on available information, any residual petroleum constituents at the site do not pose significant risk to human health, safety, or the environment.

The case complies with the requirements of the Low-Threat Underground Storage Tank (UST) Case Closure Policy as described below.¹

<p>Is corrective action consistent with Chapter 6.7 of the Health and Safety Code and implementing regulations? The corrective action provisions contained in Chapter 6.7 of the Health and Safety Code and the implementing regulations govern the entire corrective action process at leaking UST sites. If it is determined, at any stage in the corrective action process, that UST site closure is appropriate, further compliance with corrective action requirements is not necessary. Corrective action at this site has been consistent with Chapter 6.7 of the Health and Safety Code and implementing regulations and, since this case meets applicable case-closure requirements, further corrective action is not necessary, unless the activity is necessary for case closure.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Have waste discharge requirements or any other orders issued pursuant to Division 7 of the Water Code been issued at this case?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>If so, was the corrective action performed consistent with any order?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p>General Criteria General criteria that must be satisfied by all candidate sites:</p> <p>Is the unauthorized release located within the service area of a public water system?</p> <p>Does the unauthorized release consist only of petroleum?</p> <p>Has the unauthorized (“primary”) release from the UST system been stopped?</p> <p>Has free product been removed to the maximum extent practicable?</p> <p>Has a conceptual site model that assesses the nature, extent, and mobility of the release been developed?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

¹ Refer to the Low-Threat Underground Storage Tank Case Closure Policy for closure criteria for low-threat petroleum UST sites.
http://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2012/rs2012_0016atta.pdf

<p>Has secondary source been removed to the extent practicable?</p> <p>Has soil or groundwater been tested for MTBE and results reported in accordance with Health and Safety Code Section 25296.15?</p> <p>Nuisance as defined by Water Code section 13050 does not exist at the site?</p> <p>Are there unique site attributes or site-specific conditions that demonstrably increase the risk associated with residual petroleum constituents?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p><u>Media-Specific Criteria</u> Candidate sites must satisfy all three of these media-specific criteria:</p> <p>1. Groundwater: To satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites:</p> <p>Is the contaminant plume that exceeds water quality objectives stable or decreasing in areal extent?</p> <p>Does the contaminant plume that exceeds water quality objectives meet all of the additional characteristics of one of the five classes of sites?</p> <p>If YES, check applicable class: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5</p> <p>For sites with releases that have not affected groundwater, do mobile constituents (leachate, vapors, or light non-aqueous phase liquids) contain sufficient mobile constituents to cause groundwater to exceed the groundwater criteria?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA</p>
<p>2. Petroleum Vapor Intrusion to Indoor Air: The site is considered low-threat for vapor intrusion to indoor air if site-specific conditions satisfy all of the characteristics of one of the three classes of sites (a through c) or if the exception for active commercial fueling facilities applies.</p> <p>Is the Site an active commercial petroleum fueling facility? Exception: Satisfaction of the media-specific criteria for petroleum vapor intrusion to indoor air is not required at active commercial petroleum fueling facilities, except in cases where release characteristics can be reasonably believed to pose an unacceptable health risk.</p> <p>a. Do site-specific conditions at the release site satisfy all of the applicable characteristics and criteria of scenarios 1 through 3 or all of the applicable characteristics and criteria of scenario 4? If YES, check applicable scenarios: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/> 4</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p>

<p>b. Has a site-specific risk assessment for the vapor intrusion pathway been conducted and demonstrates that human health is protected to the satisfaction of the regulatory agency?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p>c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, has the regulatory agency determined that petroleum vapors migrating from soil or groundwater will have no significant risk of adversely affecting human health?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p>3. Direct Contact and Outdoor Air Exposure: The site is considered low-threat for direct contact and outdoor air exposure if site-specific conditions satisfy one of the three classes of sites (a through c).</p>	
<p>a. Are maximum concentrations of petroleum constituents in soil less than or equal to those listed in Table 1 for the specified depth below ground surface (bgs)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p>
<p>b. Are maximum concentrations of petroleum constituents in soil less than levels that a site specific risk assessment demonstrates will have no significant risk of adversely affecting human health?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p>c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, has the regulatory agency determined that the concentrations of petroleum constituents in soil will have no significant risk of adversely affecting human health?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

ATTACHMENT 2: SUMMARY OF BASIC CASE INFORMATION (Conceptual Site Model)

Site Location/History

- The Site is located at 413 West Sunset Boulevard in Hayward.
- The Site is occupied by the RAS-CO Manufacturing Company building and yard as well as a house and garage. The Site is bounded by residences to the south, west and north and by Interstate Highway 880 to the east.
- The USTs were removed in November 1994 and over-excavation of affected soil occurred in the following months. In 1999, one monitoring well was installed and sampled.
- Site map showing the location of the former USTs and wells MW-1 and Ag Well is provided at the end of this closure review summary (Environmental Risk Specialties Corporation [ERS], 2011).
- Nature of Contaminants of Concern: Gasoline.
- Source: UST system.
- Date reported: November 1994.
- Status of Release: USTs removed.
- Free Product: None reported.

Tank Information

Tank No.	Size in Gallons	Contents	Closed in Place/ Removed/Active	Date
1	500	Gasoline	Removed	November 1994
2	250	Gasoline	Removed	November 1994

Receptors

- GW Basin: Santa Clara Valley – East Bay Plain.
- Beneficial Uses: Agricultural Supply, Municipal, and Domestic Supply.
- Land Use Designation: Residential.
- Public Water System: East Bay Municipal Utilities District (EBMUD).
- Distance to Nearest Supply Well: According to data available in GeoTracker, there are no public supply wells regulated by CDPH within 250 feet of the defined plume boundary. An on-Site domestic irrigation well (Ag Well) is located approximately 50 west of the former UST excavation. A door-to-door well survey was conducted by ERS in 2012. No additional wells have been identified within 250 feet of the defined plume boundary in files reviewed.
- Distance to Nearest Surface Water: No surface water identified within 250 feet of the defined plume boundary.

Geology/Hydrogeology

- Stratigraphy: The Site is underlain by sandy clay, fine-grained sands and silts to approximately 30 feet bgs.
- Maximum Sample Depth: 30 feet below ground surface (bgs).
- Minimum Groundwater Depth: 21.38 feet bgs at the Ag Well.
- Maximum Groundwater Depth: 23.06 feet bgs at the Ag Well.
- Current Average Depth to Groundwater: ~23 feet bgs.
- Saturated Zones(s) Studied: 18 - 28 feet bgs.
- Appropriate Screen Interval: Yes.

- Groundwater Flow Direction: Regional groundwater flow is towards the west to northwest, generally towards San Francisco Bay. Monitoring wells MW-1 and Ag Well are located approximately 10 feet west and 60 feet west of the former excavation, respectively, and groundwater levels within these wells are consistent with regional data.

Monitoring Well Information

Well Designation	Date Installed	Screen Interval (feet bgs)	Depth to Water (feet bgs) (12/16/10)
MW-1	June 1999	18-28	22.59
Ag Well	NA	NA	23.06

Remediation Summary

- Free Product: None reported.
- Soil Excavation: Impacted soil (approximately 230 cubic yards) was removed to a depth of 21 feet bgs, remediated to non-detect levels, and reused on-Site as approved by County.
- In-Situ Soil/Groundwater Remediation: None reported.

Most Recent Concentrations of Petroleum Constituents in Soil*

Constituent	Maximum 0-5 feet bgs [mg/kg and (date)]	Maximum 5-10 feet bgs [mg/kg and (date)]
Benzene	<0.005 (10/03/95)	<0.005 (10/03/95)
Ethylbenzene	<0.005 (10/03/95)	<0.005 (10/03/95)
Naphthalene	NA	NA
PAHs	NA	NA

*: Values reported for stockpiled soil which reported non-detect concentrations prior to use as backfill
 mg/kg: milligrams per kilogram, parts per million
 <: Not detected at or above stated reporting limit
 PAHs: Polycyclic aromatic hydrocarbons

Most Recent Concentrations of Petroleum Constituents in Groundwater

Sample	Sample Date	TPHg (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)	TBA (µg/L)
MW-1	12/16/10	<50	<0.005	<0.005	<0.005	<0.005	<0.50	<10
Ag Well	12/16/10	<50	<0.005	<0.005	<0.005	<0.005	<0.50	<10
WQOs	-	50	1	300	700	1,750	5	12

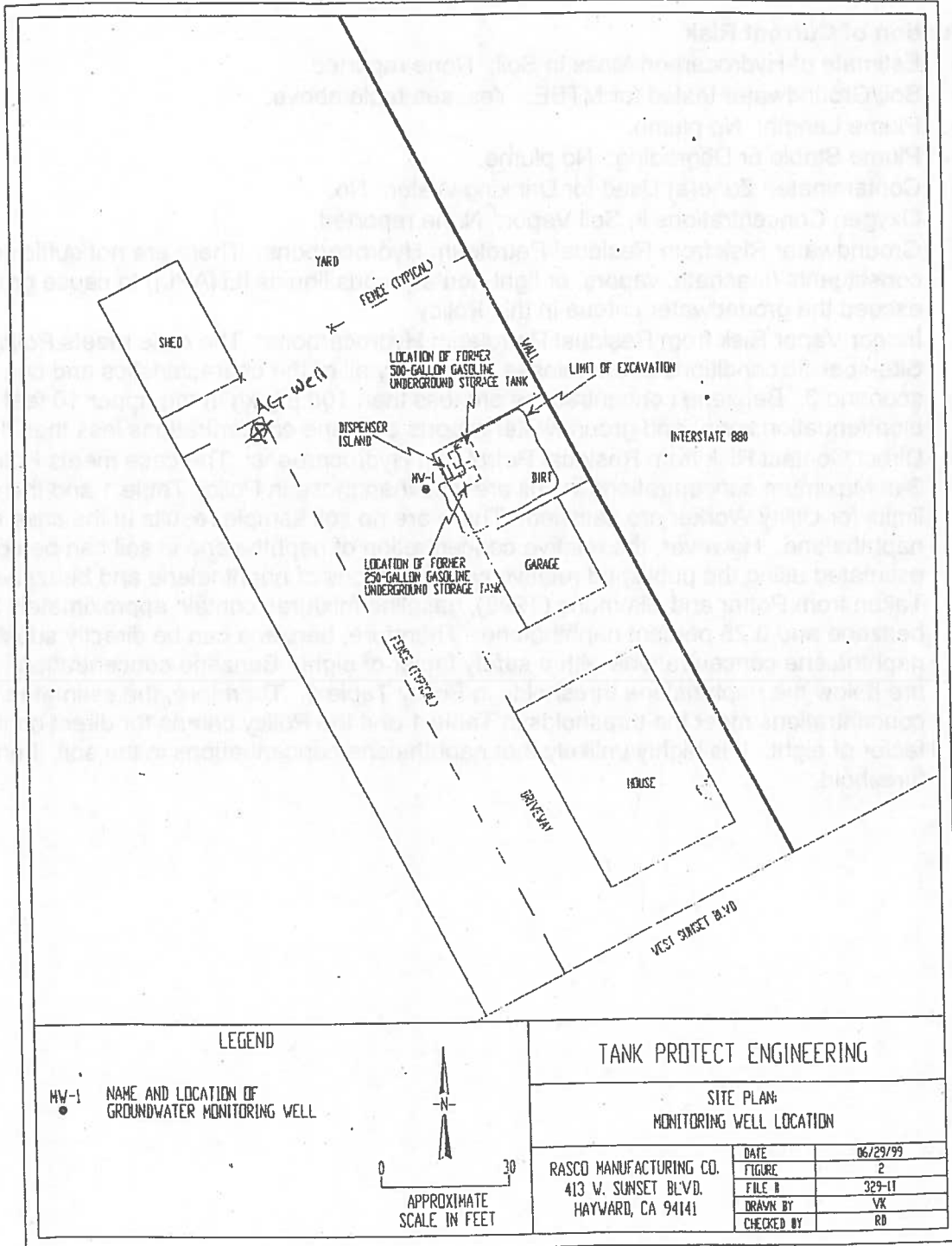
µg/L: micrograms per liter, parts per billion
 <: Not detected at or above stated reporting limit
 TPHg: Total petroleum hydrocarbons as gasoline
 MTBE: Methyl tert-butyl ether
 TBA: Tert-butyl alcohol
 WQOs: Water Quality Objectives, Region 2 Basin Plan

Groundwater Trends

- Available data reports non-detect concentrations in groundwater, although Ag Well was reported to have MTBE in one sample in 1996. There is no groundwater plume.

Evaluation of Current Risk

- Estimate of Hydrocarbon Mass in Soil: None reported.
- Soil/Groundwater tested for MTBE: Yes, see table above.
- Plume Length: No plume.
- Plume Stable or Degrading: No plume.
- Contaminated Zone(s) Used for Drinking Water: No.
- Oxygen Concentrations in Soil Vapor: None reported.
- Groundwater Risk from Residual Petroleum Hydrocarbons: There are not sufficient mobile constituents (leachate, vapors, or light non-aqueous liquids [LNAPL]) to cause groundwater to exceed the groundwater criteria in this Policy.
- Indoor Vapor Risk from Residual Petroleum Hydrocarbons: The case meets Policy Criterion 2a. Site-specific conditions at the release site satisfy all of the characteristics and criteria of scenario 3. Benzene concentrations are less than 100 mg/kg in the upper 10 feet of soil (the bioattenuation zone) and groundwater reports benzene concentrations less than 100 µg/L.
- Direct Contact Risk from Residual Petroleum Hydrocarbons: The case meets Policy Criterion 3a. Maximum concentrations in soil are less than those in Policy Table 1 and the concentration limits for Utility Worker are satisfied. There are no soil sample results in the case record for naphthalene. However, the relative concentration of naphthalene in soil can be conservatively estimated using the published relative concentrations of naphthalene and benzene in gasoline. Taken from Potter and Simmons (1998), gasoline mixtures contain approximately 2 percent benzene and 0.25 percent naphthalene. Therefore, benzene can be directly substituted for naphthalene concentrations with a safety factor of eight. Benzene concentrations from the Site are below the naphthalene thresholds in Policy Table 1. Therefore, the estimated naphthalene concentrations meet the thresholds in Table 1 and the Policy criteria for direct contact by a factor of eight. It is highly unlikely that naphthalene concentrations in the soil, if any, exceed the threshold.



ATTACHMENT 4

ACEH April Letter





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

April 23, 2013

Mr. Pete Mizera
State Water Resources Control Board
1001 I Street, 16th Floor
Sacramento, CA 95814
(Sent via E-mail to: USTClosuresComments@waterboards.ca.gov)

Subject: **Comment Letter – RAS-CO Manufacturing Co. Case Closure Summary**, Notice of Opportunity for Public Comment; Underground Storage Tank Cleanup Fund Case Closure Recommendation; Claim Number 10081; Fuel Leak Case No. RO0000164 and GeoTracker Global ID T0600101947, RAS-CO Manufacturing, 413 West Sunset Boulevard, Hayward, CA 94541

Dear Mr. Mizera:

Alameda County Environmental Health (ACEH) staff has received the Underground Storage Tank Cleanup Fund's (USTCF's or Fund's) *Notice of Opportunity for Public Comment* dated February 28, 2013, for the subject site. The purpose of the Notice is to inform interested parties of 1) the USTCF's intent to recommend closure of the subject site to the California State Water Resources Control Board's (SWRCBs) Executive Director, and 2) the sixty day public comment period on the Fund's *UST Case Closure Summary Report* (Case Closure Summary), dated February 25, 2013. According to the Notice, written comments to the SWRCB on the Fund's Case Closure Summary must be received by 12:00 noon on April 24, 2013. This letter herein transmits ACEH's comments.

Requirements for Investigation and Cleanup of Unauthorized Releases from USTs

ACEH reviewed the USTCF's *UST Case Closure Review Summary Report*, dated February 25, 2013, prepared by Roger Hoffmore, and signed by Lisa Babcock, including *Attachment 1: Compliance with State Water Board Policies and State Law*, and *Attachment 2: Summary of Basic Site Information (Conceptual Site Model)* in conjunction with the case files for the above-referenced site. A complete record of the case files (i.e., regulatory directives and correspondence, reports, data submitted in electronic deliverable format, etc.) can be obtained through review of both the SWRCB's Geotracker database, and the ACEH website at <http://www.acgov.org/aceh/index.htm>.

ACEH's review was guided by the requirements for investigation and cleanup of unauthorized releases from underground storage tanks (USTs) contained in the following resolutions, policies, codes, and regulations:

- SWRCB's Low-Threat Underground Storage Tank Case Closure Policy (LTCP), adopted on May 1, 2012; and effective August 17, 2012;
- California Code of Regulations (CCR) Title 23, Article 5 and Article 11, Underground Storage Tank Regulations, as amended and effective July 1, 2011;
- California Health & Safety Code (HS&C) Sections 25280-15299.8, Underground Storage of Hazardous Substances, as amended on January 1, 2011;
- SWRCB Resolution 1992-0049, Policies and Procedures for the Cleanup and Abatement of Discharges under California Water Code Section 13304, as amended on April 21, 1994 and October 2, 1996;

- San Francisco Bay Regional Water Quality Control Board's (RWQCB) San Francisco Bay Basin (Region 2) Water Quality Control Plan (Basin Plan).

Application of Case Review Tools

ACEH's case closure evaluation was also guided by the application of the principles and strategies presented in the *Leaking Underground Fuel Tank Guidance Manual* (CA LUFT Manual), dated September 2012, developed by the SWRCB "...[t]o provide guidance for implementing the requirements established by the Case Closure Policy" and associated reference documents including but not limited to:

- *Technical Justification for Vapor Intrusion Media-Specific Criteria*, SWRCB dated March 21, 2012;
- *Technical Justification for Groundwater Media-Specific Criteria*, SWRCB dated April 24, 2012;
- *Technical Justification for Soil Screening Levels for Direct Contact and Outdoor Air Exposure Pathways*, SWRCB dated March 15, 2012;
- *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air, Final DTSC*, dated October, 2011;
- *Evaluating LNAPL Remedial Technologies for Achieving Project Goals, Interstate Technology Regulatory Council*

ACEH also utilized other case review tools developed by the SWRCB to aid in determining compliance of the subject fuel leak site with LTCP criteria, including both the paper *Policy Checklist* (available at www.waterboards.ca.gov/ust/docs/checklist.pdf) and the electronic version of the *Policy Checklist* (available on the SWRCB's GeoTracker website at <http://geotracker.waterboards.ca.gov>). Additionally, ACEH staff utilizes a *Data Gap Identification Tool* (DGIT) to facilitate consistent application of the LTCP by ACEH staff, assist in identification of impediments to closure, and document our decision making process as transparently as possible for interested parties.

ACEH's evaluation of the subject site is presented below.

Summary of ACEH's Review of the USTCF's UST Case Closure Summary

ACEH is in agreement with the Fund's recommendation for case closure; however disagrees with the representation of ACEH's objectives, and the scenarios the Fund selected to demonstrate compliance with the Vapor Intrusion to Indoor Air and Direct Contact and Outdoor Air Exposure media specific criteria as follows:

1. **Objections to Closure** – In the Case Closure Summary Report, the Fund presents a summary of ACEH's objections to case closure. ACEH notes that the majority of objections listed are dated and have been addressed to ACEH's satisfaction by the collection of data subsequent to the time ACEH recorded the objections in response to the Second USTCF 5-Year Review Summary dated October 12, 2011. The removal of closure objections has previously been communicated with the USTCF, and included obtaining USTCF concurrence with ACEH initiation of the closure process.
2. **Soil Only Case** – The Fund characterizes the site as a soil only case in the Case Closure Review Summary Report. ACEH notes that the presence of methyl tert-butyl ether (MTBE) at a concentration of 1,200 micrograms per liter ($\mu\text{g/L}$) in the onsite agricultural well in 1996 indicates the unauthorized release historically impacted groundwater resources at the site. The USTCF concurrence with funding for the sampling of one downgradient domestic well in 2012 is an acknowledgement of this fact.
3. **Vapor Intrusion to Indoor Air** – The USTCF has found that the site fits Policy Criterion 2a, Scenario 3 of the Media Specific Criteria for Vapor Intrusion to Indoor Air and states that benzene concentrations are less than 100 milligrams per kilogram (mg/kg) in the upper 10 feet of soil. ACEH's notes that Criterion 2a, Scenario 3 requires total petroleum hydrocarbon (TPH) to be less than 100 mg/kg , rather than benzene. ACEH's review of the case files indicates that except for UST removal confirmation soil samples, no soil samples have been collected at the site above 12 feet below ground surface (bgs). The three UST removal confirmation soil samples contained up

to 5,000 mg/kg TPH, and have been overexcavated. All other "shallow" soil samples were collected from stockpiled soil. ACEH notes that the former dispenser location was not sampled at the time of the UST removal and has the potential for shallow soil contamination. Consequently, ACEH is not in agreement that this site meets Policy Criterion 2a, Scenario 3 of the Media Specific Criteria for Vapor Intrusion to Indoor Air. ACEH recommends the site be closed under Policy Criteria 2c which would require implementation of site institutional or engineering controls at the time of construction or redevelopment at the site due to the lack of shallow soil data.

- 4. Direct Contact and Outdoor Air Exposure** – The USTCF has found that the site fits Policy Criterion 3a of the Media Specific Criteria for Direct Contact and Outdoor Air Exposure. Again ACEH notes that no soil samples have been collected at the site above 12 feet bgs, and that the former dispenser location was not sampled at the time of the UST removal and has the potential for shallow soil contamination. As noted above, the three UST removal confirmation soil samples contained up to 5,000 mg/kg TPH, and have been overexcavated. All other "shallow" soil samples were collected from stockpiled soil. Therefore, ACEH is in disagreement that this site meets Policy Criterion 3a. ACEH recommends the site be closed under Criteria 3.3 and require implementation of site institutional or engineering controls at the time of construction or redevelopment at the site.

Conclusions

ACEH is in agreement that the case qualifies for closure under the LTCP; however disagrees with the scenarios selected by the Fund to satisfy the media specific criteria for Vapor Intrusion to Indoor Air and Direct Contact and Outdoor Air Exposure.

Thank you for providing ACEH with the opportunity to comment on the subject site. Should you have any questions regarding the responses above, please contact Mark Detterman at (510) 567-6876 or send him an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Dilan Roe, P.E.
Supervising Hazardous Materials Specialist

Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

cc: Ken Price; Environmental Risk Specialties Corporation, 1600 Riviera Avenue, Suite 310, Walnut Creek, California 94596; (sent via electronic mail to kprice@erscorp.us)

Mr. John Randall, Chevron Products Co, 6101 Bollinger Canyon Road, #5244, San Ramon, CA 94583

Lisa Babcock, State Water Resources Control Board, Division of Financial Assistance, 1001 I Street, Sacramento, CA 95814; (Sent via E-mail to: LBabcock@waterboards.ca.gov)

Roger Hoffmore, State Water Resources Control Board, Division of Financial Assistance, 1001 I Street, Sacramento, CA 95814; (Sent via E-mail to: RHoffmore@waterboards.ca.gov)

Robert Trommer, State Water Resources Control Board, Division of Financial Assistance, 1001 I Street, Sacramento, CA 95814; (Sent via E-mail to: RTrommer@waterboards.ca.gov)

Mr. Pete Mizera
RO0000164
March 8, 2013, Page 4

Mary Rose Cassa, San Francisco Regional Water Quality Control Board, 1515 Clay Street, Suite
1400, Oakland, CA 94612

Donna Drogos, (sent via electronic mail to donna.drogos@acgov.org)
Mark Detterman (sent via electronic mail to mark.detterman@acgov.org)
Dilan Roe (sent via electronic mail to dilan.roe@acgov.org)
Electronic File, GeoTracker