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HEALTH CARE SERVICES
AGENCY
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January 31, 2008

Mr. John Lilla
PACO Pumps, Inc.
800 Koomey Road
Brookshire, TX 77423

Mr. Harold Vignoles
9201 San Leandro LLC
9201 San Leandro Street
Oakland, CA 94603

Mr. Dallas Nelson
GP Holdings LLC
5977 Keith Avenue
Oakland, CA 94618-1545

Subject: Fuel Leak Case No. RO0000320 and Geotracker Global ID T0600101592, PACO Pumps Inc, 9201 San Leandro Street, Oakland, CA 94603

Dear Mr. Lilla, Mr. Vignoles, and Mr. Nelson:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted document entitled, "Workplan for Former Paco Pumps Facility, 9201 San Leandro Street, Oakland, California," dated January 16, 2008. The Work Plan proposes shallow soil borings in several areas of the site to address technical comments in our August 21, 2007 correspondence. However, the Work Plan does not present sufficient background or detail regarding the proposed sampling to evaluate the proposed scope of work. We request that you prepare a Revised Work Plan **by March 18, 2008** that addresses the issues discussed in the technical comments below.

REQUEST FOR INFORMATION

We previously requested that you submit copies of the following reports, which are referenced in other technical reports for the site but are not in the ACEH case file. None of these reports are provided or referenced in the January 16, 2008 Work Plan. The purpose of reviewing these documents is to assure that previously encountered conditions are considered in planning future work. Therefore, we request that you submit the documents listed below with the Revised Work Plan requested by March 18, 2008. In addition, please submit any other technical reports presenting the results of environmental investigations or cleanup that were not previously submitted to ACEH.

- Cutliffe, S., 1987. Findings and Results of the Cleanup Project Performed on 14 and 15 December 1987 at PACO Oakland Site.
- Dames & Moore, 1987. Site Contamination Study – PACO Pumps Facility, Oakland, for Amsted Industries.
- Ecology and Environment Inc., 1985. CERCLA Site Inspection, PACO Pumps 845 92nd Avenue, Oakland, CA. Site ERRIS #CAD 088772629, Inspection ID# C(85)C371, Date of Inspection 9/17/85, Report Due November 8, 1985.
- Jonas & Associates, Inc., 1991. Soil Characterization Report Stained Asphalt/Concrete Area – PACO Pumps, 9201 San Leandro Street, Oakland, CA, October 30, 1991.

- Van Aken, B., 1987. Internal PACO Correspondence to Mr. John G. Terranova regarding excavation, November 4, 1987.

TECHNICAL COMMENTS

1. **Utility Surveys.** Our August 21, 2007 technical comments requested that you determine whether UST system piping encountered during the 1992 UST excavation remains in place beneath the adjacent building or extends to a dispenser in another location. The Work Plan indicates that utility location using magnetic and ground penetrating radar methods will be conducted within the former UST area. Utility location is proposed within an area outlined on a small-scale hand drawn map labeled, "ACHSA Item #1," in Appendix B. We concur with the use of magnetic and ground-penetrating radar geophysical methods. However, since the objective is to locate UST system piping, we recommend that you review the more detailed maps that show the approximate location of piping encountered during the UST excavation. The geophysical survey should initially be conducted using a high density of measurements within the area where piping was previously observed to locate the piping and then trace the piping away from the former UST excavation. If the piping cannot be located initially, the geophysical survey should move outward with expanded line spacings to attempt to locate the system piping over a broader area. Please include a more detailed map in the Revised Work Plan requested below to show the former UST system piping and relevant site features and expand the description of how the geophysical survey is to be conducted.

2. **Maps Showing Proposed Sampling Locations.** Figure 3 in the Work Plan, which is entitled, "Proposed Borings," presents the proposed boring locations at a scale of approximately 0.9 inches equals 100 feet. This small scale is not sufficient to show site features and proposed sampling locations at an appropriate scale for planning environmental investigations. Several similar small-scale maps are included with hand notations showing data and proposed borings in Appendix B. In general, work plans submitted to ACEH include maps that are more professional in appearance than the maps included in Appendix B. In the Revised Work Plan requested below, we request that you include larger scale maps for each area of the site where investigation is proposed and improve the quality of the figures to meet industry standards. The maps must show site features that are relevant to sample design. As an example, a map of the former UST area should show the former location of the tank, limits of overexcavation, confirmation soil sampling results, piping, dispensers, nearby utilities, soil borings, monitoring wells, other site features that potentially could be a source of discharges, waste storage areas, processing or loading areas, nearby structures, type of surface covering such as concrete or asphalt, and general features such as streets, parking lots, etc.

3. **Groundwater Characterization for Former 550-Gallon UST Area.** The Work Plan proposes three soil borings within approximately 20 feet of the former UST, one soil boring approximately 125 feet southwest of the former UST, and two soil borings more than 250 feet northwest of the former UST. No vertical delineation of soil and groundwater contamination is proposed in the Work Plan. Vertical delineation is required and is to be included in the Revised Work Plan. The use of transects oriented perpendicular to the groundwater flow direction are to be considered for characterization of groundwater quality in the Revised

Work Plan requested below. In addition, please show the proposed soil boring locations in close proximity to the former UST on a more detailed map as discussed in technical comment 2.

4. **Soil Vapor Sampling.** The Work Plan proposes collection of one sub-slab vapor sample within the building and one soil vapor sample outside the building. The two proposed locations are shown on a small-scale map (Figure 3) that does not show any features within the building such as walls or office space and does not show the locations of previous sampling locations B5 and B6 where elevated concentrations of benzene were detected in soil gas. Proposed soil vapor sampling locations are also shown on a hand-annotated map in Appendix B which also lacks detail. In addition, the scope of the proposed soil vapor sampling investigation is inadequate to characterize the extent of the elevated concentrations of benzene in soil vapor. Therefore, the scope of proposed work must be expanded and presented on a more detailed site map. The more detailed site map must show site features as discussed in technical comment 2 and current uses of each room in the adjacent building.

5. **Proposed Method for Soil Vapor Sampling.** The Work Plan refers to Appendix D for a description of the method for collection of soil vapor samples. Appendix E includes a standard operating procedure for collection of soil vapor samples from direct push borings. However, no description of sub-slab vapor sampling is provided in the Work Plan. Some description of sub-slab probe construction and sampling must be included. In the Revised Work Plan requested below, please describe the procedures for sub-slab sampling in addition to soil vapor sampling from direct push borings.

6. **Proposed Utility Survey for UST in Area of Well 9MW4.** The Work Plan indicates that no information could be found regarding a suspected UST in the area of well 9MW4. Since no information is available, conducting a geophysical survey within the approximate area shown on the hand annotated figure designated, "ACHSA Item #4," is acceptable. However, the Work Plan does not describe the proposed line spacing or density of measurements for the geophysical survey. In the Revised Work Plan requested below, please expand the description of the proposed geophysical survey.

7. **Soil Removal Along Railroad Tracks.** The Work Plan proposes collection of soil samples from hand auger borings that will extend to a depth of approximately 3 feet. The proposed locations surrounding previous sampling locations B3 and B4 are shown on a hand-annotated map derived from a previous report. The extent of excavation in this area was apparently based on visual observation and odor. In the Revised Work Plan requested below, we request that you describe the procedures for logging, screening, and selecting soil samples for laboratory analysis. In addition, please review the extent of the former excavations and propose sampling as necessary to define the horizontal extent of contamination outside the former excavations.

8. **PCBs in Soil.** The Revised Work Plan requested below must include a more detailed map of the proposed PCB sampling locations than the hand-annotated small-scale figure entitled, "ACHSA Item #6," that is presented in Appendix B of the Work Plan. We repeat the request in our August 21, 2007 technical comments to please provide a more detailed map of the

area that shows the likely source of the PCBs and the sampling locations where PCBs have been detected in soil (see technical comment 2 regarding appropriate site maps).

9. **Elevated Concentrations of TPH as Kerosene and TPH as Motor Oil Detected in Boring B18.** In the Revised Work Plan requested below, please provide a more detailed map of the area of boring B18 and proposed sampling locations.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **March 18, 2008** – Revised Work Plan

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be

signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

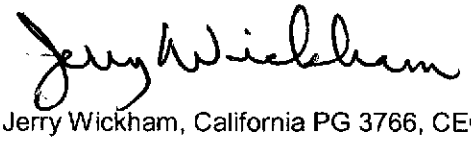
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to $10,000 per day for each day of violation.

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Stacie Boothe, Gibson, Dunn, & Crutcher, LLP, 1050 Connecticut Avenue, N.W., Washington, D.C. 20036-5306

Donna Drogos, Jerry Wickham, ACEH
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