

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION
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September 26, 2008

Mr. John Lilla
PCC Flow Technologies Holdings, Inc.
16801 Greenspoint Park Drive, Suite 355
Houston, TX 77060

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 report entitled, "*Subsurface Investigation and Groundwater Monitoring Report Quarter 2, 2008.*" The "*Subsurface Investigation Report,*" which was prepared on behalf of Mr. Mark Vignoles, Service West, by ERAS Environmental, Inc., presents results from soil, soil vapor, and groundwater sampling conducted in June 2008 in several areas of the site.

In correspondence dated May 9, 2008, ACEH requested that you prepare a revised Work Plan to address our technical comments prior to implementation of the proposed work. However, the work was implemented without preparation of a revised Work Plan. Several but not all of our May 9, 2008 technical comments were incorporated in conducting the site investigation activities. In particular, soil vapor sampling and groundwater characterization for the former 550-gallon UST have not been completed. Therefore, site characterization has not been completed for the site.

The "*Subsurface Investigation Report,*" recommends further investigation and soil excavation in several areas of the site. We request *that* you address the technical comments below, implement the proposed investigation activities, and submit the Site Investigation Report requested below. With regard to the proposed soil removal actions, we request that you provide further information on soil handling, disposal, and backfilling of the excavation and provide a schedule for implementing the excavation. This information regarding the soil removal actions may be submitted with the Site Investigation Report requested below or in a Work Plan.

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REQUEST FOR INFORMATION

In correspondence dated January 31, 2008 and May 9, 2008 we requested five documents that are not in the ACEH case file but are referenced in other reports. Two of the five requested documents were submitted by Mr. Marc Zeppetello of Barg, Coffin, Lewis & Trapp Attorneys LLC. The remaining three documents were produced in the time period from 1985 to 1987 when Paco Pumps owned and operated the site. We request that PCC Flow Technologies, Inc., which is the corporate successor by merger to Paco Pumps, Inc., provide the three documents listed below by November 6, 2008.

- Cutliffe, S., 1987. Findings and Results of the Cleanup Project Performed on 14 and 15 December 1987 at PACO Oakland Site.
- 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.
- Van Aken, B., 1987. Internal PACO Correspondence to Mr. John G. Terranova regarding excavation, November 4, 1987.

TECHNICAL COMMENTS

1. **Soil Contamination along Railroad Tracks.** Total petroleum hydrocarbons (TPH) as diesel and TPH as motor oil were detected in soil samples collected between the building and railroad tracks in the southwestern portion of the site. The "*Subsurface Investigation Report*," recommends excavation of soil to a depth of 3.5 feet bgs within this area. The proposal to conduct soil excavation and confirmation soil sampling in this area is acceptable. We request that you provide further information on soil handling, disposal, and backfilling of the excavation and provide a schedule for implementing the excavation. This information is to be submitted with the Site Investigation Report requested below or in a Work Plan no later than January 9, 2009.
2. **PCBs in Soil.** The "*Subsurface Investigation Report*," recommends excavation of soil to a depth of 5 feet bgs in the area southeast of monitoring well MW-1 due to the detection of PCBs in soil. The proposal to conduct soil excavation and confirmation soil sampling in this area is acceptable. We request that you provide further information on soil handling, disposal, and backfilling of the excavation and provide a schedule for implementing the excavation. This information is to be submitted with the Site Investigation Report requested below or in a Work Plan no later than January 9, 2009.
3. **Petroleum Hydrocarbon Contamination in Vicinity of MW-2.** TPH as diesel, TPH as kerosene, and TPH as motor oil were detected at concentrations exceeding screening levels along the property boundary south of MW-2. TPH as motor oil was detected at concentrations up to 20,000 mg/kg. The "*Subsurface Investigation Report*," recommends excavation of soil to a depth of 2.5 feet bgs over an area extending southwest of monitoring well MW-2. The proposal to conduct soil excavation and confirmation soil sampling in this area is acceptable. We request that you provide further information on soil handling, disposal, and backfilling of the excavation and provide a schedule for implementing the

excavation. This information is to be submitted with the Site Investigation Report requested below or in a Work Plan no later than January 9, 2009.

4. **Groundwater Characterization for Former 550-Gallon UST Area.** Fuel hydrocarbons were detected at elevated concentrations in grab groundwater samples collected from each of the three soil borings advanced in the area of the former 550-gallon UST (GP-2, GP-4, and GP-6). One soil boring, which was proposed approximately 125 feet northwest of the former 550-gallon UST, was not advanced as planned. The "*Subsurface Investigation Report*," now recommends advancing soil borings for collection of soil, soil vapor, and groundwater samples at six locations inside the warehouse building. The proposed sampling locations are generally acceptable; however, we request that the southernmost proposed boring location be moved approximately 10 feet to the southeast to provide a broader area of coverage. Soil and groundwater samples are to be analyzed for TPHg and TPHd using EPA Method 8015 and BTEX, MTBE, TBA, EDB, and 1,2 DCA using EPA Method 8260. In addition, please see technical comment 8 below regarding soil vapor sample analyses. Please present results in the Site Investigation Report requested below.
5. **Proposed Monitoring Well Installation.** The "*Subsurface Investigation Report*," recommends installation of monitoring wells in both the upper and lower water-bearing zones adjacent to soil boring locations GP-1 and GP-8 and one monitoring well in the lower water-bearing zone adjacent to well MW-3. Although we concur that one monitoring well should be installed in the lower water-bearing zone in the area of existing well MW-3, we recommend that that the well be installed following collection of soil and grab groundwater samples from the proposed soil borings inside the warehouse building. The need for monitoring wells adjacent to soil boring locations GP-1 and GP-8 is not clear based on available data and should be evaluated following collection of soil and grab groundwater samples from the proposed soil borings inside the warehouse building. Please present recommendations regarding additional monitoring well installation in the Site Investigation Report requested below.
6. **Contamination Associated with UST near MW-4.** The "*Subsurface Investigation Report*," indicates that it is not feasible at this time to locate the suspected UST pit and confirm whether the UST was removed. The "*Subsurface Investigation Report*," recommends advancing one soil boring along the southeast wall of the northeastern warehouse building. The proposal to advance one soil boring is acceptable. Please present the results in the Site Investigation Report requested below.
7. **Subslab Vapor Sampling.** The proposed subslab sampling inside the warehouse building is generally acceptable. We request that all soil vapor and subslab vapor samples be analyzed for chlorinated solvents in addition to TPHg, BTEX, and MTBE. Please present the results in the Site Investigation Report requested below.

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TECHNICAL REPORT REQUEST

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

- **January 9, 2009** – Site Investigation Report

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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to 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 Instructions." 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. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all 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 monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is 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

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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

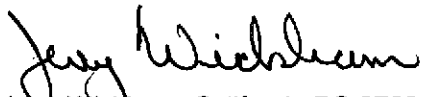
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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. Case files can be reviewed online at the ACEH website (<http://www.acgov.org/aceh/index.htm>).

Sincerely,



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

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032

Gail Jones, ERAS Environmental, 1533 B Street, Hayward, CA 94541

Marc Zeppetello, Barg, Coffin, Lewis, & Trapp, Attorneys LLP, 350 California Street, 22nd Floor, San Francisco, CA 94104-1435

Scott Kaplan, Stoel Rives LLP, 900 S.W. Fifth Avenue, Suite 2600, Portland, OR 97204

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, 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.

REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:
RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

Submission Instructions

- 1) Obtain User Name and Password:
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to dehloptoxic@acgov.org
or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
 - b) In the subject line of your request, be sure to include **"ftp PASSWORD REQUEST"** and in the body of your request, include the **Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload)