

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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December 10, 2008

Mr. David E. Murray
PCC Flow Technologies Holdings, Inc.
4600 SE Harney Drive
Portland, OR 97206-0898

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. Murray, 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, "*Work Plan to Conduct Investigation and Remediation Activities at 9201 San Leandro Street, Oakland, California (Fuel Leak Case #RO0000320)*". The *Work Plan*, which was prepared on behalf of Mr. Mark Vignoles, Service West, by LFR Environmental Management & Consulting Engineering, proposes further investigation to define the horizontal and vertical extent of contamination, shallow soil excavation, and a pilot test to evaluate soil vapor extraction and air sparging.

The proposed scope of work is generally acceptable and may be implemented provided that the technical comments below are addressed during implementation of the in-situ chemical oxidation monitoring. Submittal of a revised Work Plan or Work Plan Addendum is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Area 1: Excavation of Petroleum Hydrocarbon Contamination in Vicinity of MW-2.** The proposed excavation and off-site disposal of TPH-contaminated soil from the area of monitoring well MW-2 is generally acceptable. The Work Plan proposes not excavating under existing buildings and limiting the depth of the excavation to 5 feet bgs. The proposed limitation is apparently based on the assumption that excavation to a depth of 5 feet bgs is protective of human health for residential land use. We do not concur that excavation to a depth of 5 feet bgs is necessarily protective of human health for residential land use. We request that the excavation be extended below a depth of 5 feet bgs where feasible to meet the proposed cleanup objectives.

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2. **Soil Cleanup Levels.** The proposed soil cleanup levels for TPH as motor oil of 2,500 milligrams per kilogram (mg/kg) and TPH as diesel of 180 mg/kg are acceptable for the Area 1 excavation. Since TPH as kerosene is a middle distillate, a soil cleanup level of 180 mg/kg is to be applied.
3. **Confirmation Soil Samples.** The proposed confirmation soil sampling is generally acceptable. Sidewall confirmation samples are to be collected from the depth interval where the highest PID readings, odor, or visual contamination was observed during excavation. ACEH may direct additional confirmation soil sampling based upon observations in the field during or following excavation. The excavation is to be extended to remove visibly stained and odorous soil prior to confirmation soil sampling. The excavation is to be extended in areas where confirmation soil samples exceed the proposed cleanup levels as modified in technical comment 2. For any excavation sidewalls where these parameters cannot be achieved due to the presence of surface structures or utilities, ACEH is to be notified and additional confirmation sampling will be required to document the extent of contamination left in place beneath the utility or structure. Please provide a minimum of 48 hours advance notification of confirmation soil sampling (e-mail preferred to jerry.wickham@acgov.org) in order for ACEH to observe conditions in the sidewall and direct any additional confirmation soil sampling required. Please present the results in the Excavation Report requested below.
4. **Analysis of Confirmation Soil Samples.** We request that the confirmation soil samples be analyzed for TPH as kerosene using EPA Method 8015 in addition to the proposed analyses for TPH as diesel and TPH as motor oil. Please present the results in the Excavation Report requested below.
5. **Proposed Locations for MIP Borings.** We request that proposed MIP borings MIP-3 and MIP-4 be moved approximately 15 feet in a southwesterly direction in order to be in locations that are more directly downgradient from the former UST. Please see Attachment A: Revised Sample Locations.
6. **Proposed Soil Vapor Extraction and Air Sparging Pilot Test.** The proposal to conduct a soil vapor extraction and air sparging pilot test is acceptable. A minimum of four increases (steps) in applied vacuum/flow must be included in the SVE pilot test. The duration of each step will depend upon the time required to reach equilibrium in operational and monitoring parameters. Due to the potential for anisotropic responses to the applied vacuum and to evaluate whether SVE is effective in mitigating potential vapor intrusions beneath the building, a second cluster of SVE and air sparging monitoring wells is required inside the building. We request that the second cluster be located inside the building and northwest of the former UST. The distance from the soil vapor extraction well to the second SVE and air sparging monitoring well cluster is to be greater than 20 feet.
7. **Sample Analyses.** The proposed analysis of soil vapor samples for TPHg and VOCs is acceptable. We request that analysis for VOCs using EPA Method TO-15 include reporting of all VOCs on the target list including chlorinated solvents. TPHg analysis is to be conducting using EPA Method TO-3.
8. **Proposed Boring in Area 5.** The proposal to advance one soil boring to collect a grab groundwater sample at a location approximately 160 feet west of the suspected location of a UST in the warehouse building is acceptable. We request that the soil boring be sampled continuously for logging and screening purposes. Field screening is to be conducted by a qualified field geologist or

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engineer using visual observations, odor, and field photoionization detector (PID) measurements taken with a PID fitted with an appropriate lamp that is calibrated for the chemicals of concern. Soil samples are to be collected for laboratory analysis from any zones where visible staining, odor, or elevated PID readings are observed. If no visible staining, odor, or elevated PID readings are observed in the borings, one soil sample is to be collected from the capillary fringe for laboratory analysis. The soil sample(s) are to be analyzed for the same analytes proposed for the grab groundwater sample.

TECHNICAL REPORT REQUEST

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

- **April 21, 2009** – Site Investigation and Pilot Test 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

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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

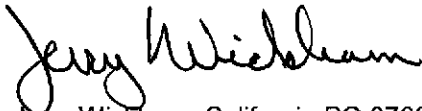
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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

Attachment A: Revised Sample Locations

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Enclosure: ACEH Electronic Report Upload (ftp) Instructions

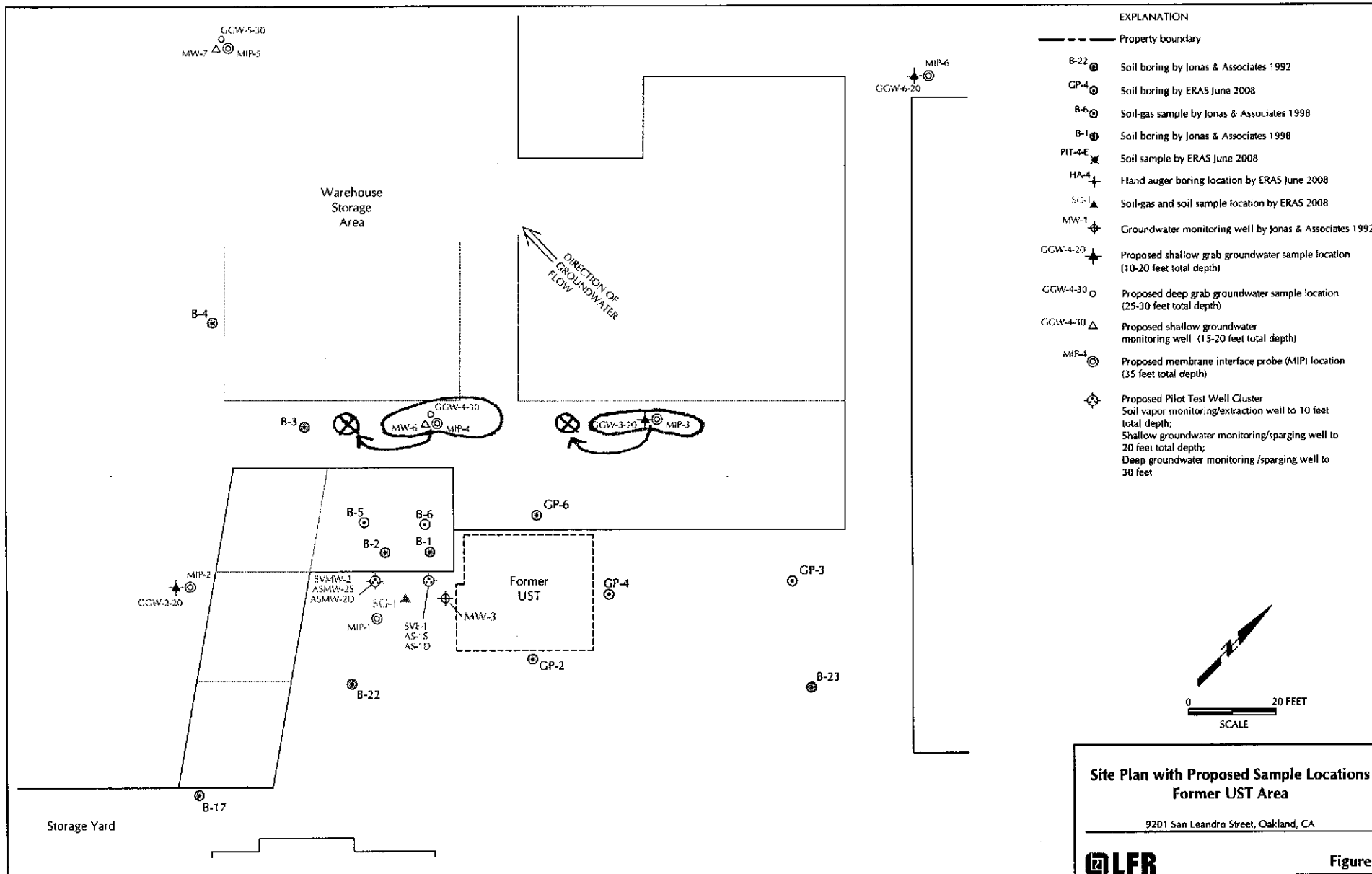
cc: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032

Ron Goloubow, LFR, 1900 Powell Street, 12th Floor, Emeryville, CA 94608

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



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Attachment A: Revised Sample Locations

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)