



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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May 10, 2012

Mr. David E. Murray
PCC Flow Technologies Holdings, Inc.
4600 SE Harney Drive
Portland, OR 97206-0898
(sent via electronic mail to:
DMurray@pccstructurals.com)

Mr. Harold Mark Vignoles
9201 San Leandro LLC
9201 San Leandro Street
Oakland, CA 94603
(sent via electronic mail to: mark@servicewest.com)

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

Mr. David Murray
PCC Precision Castparts Corp.
4650 SW Macadam Avenue, #400
Portland, OR 97239

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

Dear Messrs. Murray, Vignoles, and Nelson:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including the *Sub-Slab Vapor Survey and Remedial Investigation Work Plan*, dated January 13, 2012, and the *Second Semi-Annual 2011 Groundwater Monitoring Report*, dated January 28, 2012 (received February 16, 2012). The reports were prepared and submitted on your behalf by The Source Group (SGI) of Signal Hill, California. Thank you for submitting the reports. Thank you also for the inclusion of the preferential pathway study for both onsite underground conduits and a well search for wells within a ¼-mile radius. Briefly, the work plan proposes the installation of six temporary sub-slab soil vapor points near wells with higher concentrations of contaminants in groundwater, and also proposes the installation of one sentinel groundwater monitoring well downgradient of the currently undefined groundwater contaminant plume. The work plan also responded to the previous ACEH directive letter, and discounted the effectiveness of both the HVDPE pilot tests conducted by SGI and the air sparge and vapor extraction pilot test conducted by your previous consultant (LFR, Inc.). Consequently, the work plan recommended natural attenuation as the remedial option. Based on ACEH review, it appears that both pilot tests would be viable remedial alternatives based on the data; however, all three remedial options remain unevaluated for costs. Both pilot tests were successful in extracting substantial amount of contamination, and in documenting that substantial contamination remains in-place. As previously discussed, significant residual contamination appears to be present beneath the site at undefined locations. As documented by bore logs the overexcavation associated with the gasoline UST appears to be significantly smaller than depicted in site figures. Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below.

TECHNICAL COMMENTS

- 1) Request for Work Plan Addendum** – ACEH is in general agreement with the initial approach of the work plan; however, requests a work plan addendum to address a number of data gaps present at the site, and to clarify elements of the work plan. These are discussed further below:

- a. Sub-Slab Vapor Data Collection** - The referenced work plan proposes six temporary sub-slab vapor points at locations proximal to wells with elevated detections in groundwater, including at a location close to the former gasoline UST location (SS-1). A review of the limited soil and older soil vapor analytical data for the site found additional data that indicates significant contamination may be present in the subsurface beneath the subject building (bores B-5 and B-6). ACEH additionally requests sub-slab vapor points at these locations to eliminate data gaps in the vicinity, and to delineate these areas of concern. ACEH requires the vapor points to be “permanent” points, to allow them to be sampled multiple times in accordance with DTSC guidelines for multiple sampling events.

ACEH additionally requests the installation of a minimum of three sub-slab soil vapor probes upgradient of well MW4 (Area of Concern 5) at the location of UST (former?) which has eluded efforts to further refine its position. This will allow an evaluation of risks associated with undefined residual contamination documented in downgradient well MW4 and downgradient bore MIP-6. Please document new locations, and any additional proposed locations, on a revised Figure 2 (work plan addendum) by the date identified below.

- b. Request for Additional Downgradient Groundwater Monitoring Well** – The work plan proposes the installation of one downgradient groundwater monitoring well (MW9) to define the downgradient extent of hydrocarbon contamination associated with the former gasoline UST. While ACEH agrees that a well in the proposed location will help define the downgradient extent of contamination towards the southwest where MW9 is proposed for installation, ACEH also notes that since November 2009 the groundwater gradient has consistently ranged between the northwest, west, and southwest. While groundwater monitoring well E2 helps to define the northwestern extent of gasoline contamination beneath the building and the site, it does not define the northwestern extent of motor oil-range hydrocarbon contamination; nor do wells MW5 or MW1. As a consequence, it appears appropriate to install additional wells as a transect between the proposed location of MW9 and MW5 to fill a data gap on the western property perimeter. This is anticipated to assist in defining the extent of TPHd ranged hydrocarbons in groundwater wells E6 and E7. Please document new locations, and any additional proposed locations, on a revised Figure 2 (work plan addendum) by the date identified below.

The work plan proposed to survey the new well to Geotracker survey standards. Please ensure all currently existing wells, including well MW7 which does not appear to have been previously surveyed, are included in the survey.

- c. Outstanding Request for Remedial Investigation Work Plan** – Technical Comment 3 of the November 1, 2011 directive letter requested an investigation into the location of soil sources for the TPHd and TPHmo contamination documented in groundwater beneath the site. There appear to be several potential sources based on concentrations in groundwater documented in the vicinity of E-3 / E-5 and E-10 / E-9. This remains of concern and is an outstanding request. It is understood that existing wells, in conjunction with the proposed and requested wells, may adequately define the downgradient extent of the groundwater plume; however, the sources, and the nature of the releases, are completely unevaluated. Please include the details of this investigation, in the requested work plan addendum by the date identified below.
- d. Well Screen Intervals** – The work plan specified 18-foot wells, with 10-foot screen intervals. ACEH requires shorter screen intervals in order to collect more representative groundwater samples, generally with no more than a 5 foot sand interval; however, ACEH recognizes that fully screened water-bearing zones are appropriate in thinner permeable zones, or to capture modest annual fluctuations in groundwater levels. ACEH requests an effort to minimize the screen length at each well location to the extent possible, with well screens minimally longer than the water-bearing zone, including any capillary fringe. If longer screen intervals are judged appropriate well clusters or multilevel wells (such as CMT technologies) may be appropriate. Please document intended changes in the work plan addendum requested below by the identified date.
- e. Soil Selection Protocols** – The work plan addendum describes the collection of two to three soil samples per bore at roughly static depth intervals (9 to 10 feet, and 14 to 15 feet below grade surface), but based on indications of hydrocarbon impact. To eliminate miscommunication ACEH

requests that soil samples be collected, and submitted for analysis, at signs of contamination (odor, discoloration, PID responses, etc.) and at significant changes in lithology. Please be aware to submit sufficient soil samples to define the vertical extent of associated contamination, a standing ACEH request.

- 2) Pending Regulatory Changes** – The recently approved “Low-Threat Policy” will require changes in investigatory styles and methods. While the policy has been passed by the SWRCB, it cannot be implemented due to procedural requirements at the state level at the current time. However, ACEH also notes that the policy contains a number of criteria that each area of the site will be required to meet and to document, such as the adequacy of any bioattenuation zones. It may be appropriate to begin collection of data sufficient to characterize and document these concerns.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Mark Detterman), according to the following schedule:

- **June 1, 2012** – First Quarter 2012 Groundwater Monitoring Report
- **June 15, 2012** – Work Plan Addendum
- **August 31, 2012** – Second Quarter 2012 Groundwater Monitoring Report
- **60 Days After Work Plan Approval** – Soil and Groundwater Report (SWI)
- **November 30, 2012** – Third Quarter 2012 Groundwater Monitoring 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

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

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

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations
Electronic Report Upload (ftp) Instructions

cc: Paul Parmentier, The Source Group, 1962 Freeman Avenue, Signal Hill, CA 90755
(sent via electronic mail to pparmentier@thesourcegroup.net)

Rob Bilotti, Service West, Inc; 9201 San Leandro Street, Oakland, CA 94603
(sent via electronic mail to: Rob@servicewest.com)

Marc Zeppetello, Barg Coffin Lewis & Trapp, LLP, 350 California Street, 22nd Floor, San Francisco, CA 94104-1435; (sent via electronic mail to MAZ@bcltlaw.com)

Scott Kaplan, Stoel Rives, LLP, 900 S.W. Fifth Avenue, Suite 2600, Portland, OR, 97204
(sent via electronic mail to SJKaplan@stoel.com)

Leroy Griffin, Oakland Fire Department 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (sent via electronic mail to lgriffin@oaklandnet.com)

Donna Drogos, ACEH, (sent via electronic mail to donna.drogos@acgov.org)
Mark Detterman, ACEH, (sent via electronic mail to mark.detterman@acgov.org)
Geotracker, Electronic File

Attachment 1

Responsible Party(ies) Legal Requirements/Obligations

REPORT REQUESTS

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.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

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

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection.**
- 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)

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 deh.loptoxic@acgov.org
 - 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, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - 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 deh.loptoxic@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 @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) If site is a new case without an RO#, use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.