



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

November 16, 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](mailto: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](mailto: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  
(sent via electronic mail to: [DMurray@pccstructurals.com](mailto:DMurray@pccstructurals.com))

Subject: Modified Work Plan Approval and 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) has reviewed the case file, including the May 18, 2012 *Former Paco Pumps Oakland Facility, First Quarter 2012 Groundwater Monitoring Report*, and the *Revisions to Sub-Slab Vapor Survey and Remedial Investigation Work Plan*, dated June 20, 2012 (received July 11, 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. Revisions to the work plan were generated in response to the May 10, 2012 directive letter from ACEH.

Based on ACEH staff review of the work plan and the addendum the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed field investigation. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or 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. Please provide 72-hour advance written notification to this office (e-mail preferred to: [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org)) prior to the start of field activities.

## **TECHNICAL COMMENTS**

1. **Sub-Slab Vapor Points** – There are a series of comments and concerns in regards to the proposed work; these follow:
  - a. **Sub-Slab Vapor Point Installation** - Because of changes in the southern and eastern margin of Building 3, the work plan revisions propose elimination of two sub-slab vapor points and repositioning of several of the remaining four sub-slab vapor points to locations inside Building 3. While these four locations are generally acceptable, as depicted in Figure 2 these locations can be construed to be removed from areas where higher vapor concentrations could reasonably be anticipated due to closer proximity to the source area. As a consequence, ACEH requests the

installation of two additional vapor points at locations closer to the new southern boundary of the building, at locations where it is reasonable to anticipate potentially higher vapor concentrations.

ACEH notes that these sub-slab points are intended to address vapor intrusion risks associated with the release to current interior air spaces. ACEH also notes that these locations do not assess the risk of vapor intrusion with future building modifications, nor does it assess the potential for vapor intrusion as required under the Low-Threat Closure Policy (LTCP).

- b. Atmospheric Gases** – The revisions to the work plan propose the addition of oxygen and methane to the analyte list in order to assess the presence and effectiveness of bio-attenuation zone under the buildings. ACEH requests the addition of carbon dioxide to the analyte list as this will provide useful data towards understanding any bioattenuation zone.
- c. Installation of Hand Augered Bores** – Sub-slab vapor points SS-1 and SS-2 are proposed to be installed on top of hand-augered soil bores installed to the depth of 8 to 9 feet below grade surface (bgs), and subsequently grouted to the depth required by the sub-slab vapor point installation. ACEH is in disagreement with this technique for two reasons:
  - i. Disturbance of the Soil Column** – The soil column beneath the vapor point will be both disturbed and will be backfilled with a higher density material than the existing “natural” soil column, and thus the results can be argued as not representing existing conditions, and
  - ii. Disturbance of the Sub-Slab Vapor Environment** – After installation of the hand augered bores, the sub-slab vapor environment may not be representative of the vapor environment beneath the slab, and doubt as to the appropriateness of the data collected can again be induced.

For collection of valid sub-slab vapor data, ACEH requests that the installation of hand augered bores, installed for purposes other than assessing the sub-slab environment, be located at least 5 feet laterally from the sub-slab vapor point.

- d. Installation of Building 1 Sub-Slab Points** – As requested three sub-slab vapor points have been depicted in Building 1 upgradient of well MW-4 in an attempt to refine the suspected location of the UST reported beneath this newer larger building and in an attempt to define potential vapor intrusion concerns to the building. Unfortunately, these locations are not proximal to the presumed location of the UST, that being along the eastern edge of the “previous steel building”, at the northeastern corner of that former building. As a consequence ACEH requests a discussion of appropriate locations, with subsequent documentation of the revised locations on a revised Figure 2 by the date identified below (as a work plan addendum). This can be minimized to an email communication.
- 2. Installation of Hand Augered Soil Bores** – Bores HA-1, and hand augered bores associated with SS-1 and SS-2 appear intended to gather data relative to a potential diesel source noted from groundwater sampling concentrations, as commented on in the previous directive letter (May 10, 2012). The data generated is anticipated to be useful; however, to refine a potential source area, ACEH requests that future groundwater monitoring events depict the iso-concentrations for TPHd in addition to benzene and TPHg; each as separate figures.
- 3. Installation of Groundwater Monitoring Wells** – The revisions to the work plan propose the installation of one additional downgradient groundwater monitoring well, MW-10. ACEH has several comments relative the proposal, as follows:
- a. Delineation of the Extent of Groundwater Contamination** – One groundwater monitoring well is proposed to define the downgradient extent of the groundwater plume; however, there is fairly limited confidence that well MW-10 will be correctly positioned to intercept a groundwater plume. As a consequence, ACEH requests the installation of one additional groundwater monitoring well positioned midway between MW-9 and MW-10 to increase the likelihood that a plume will be intercepted, and to increase the likelihood that the plume will then be defined. Plume definition

is a prescribed requirement by the LTCP. ACEH requests an updated Figure 2 by the date identified below (as a work plan addendum). This can be minimized to an email communication.

- b. Well Screen Intervals** – The revised work plan proposes to install well screens no longer than five feet in length, in general conformance with ACEH requests. As stated previously, ACEH recognizes that fully screened water-bearing zones are appropriate in thinner permeable zones, or to capture modest annual fluctuations in groundwater levels. Consequently ACEH requests both that the well screens be installed based on actual field encountered conditions as well as the 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.
- 4. Low-Threat Closure Policy** – The LTCP identifies criteria that each area of the site will be required to meet and to document, such as the adequacy of any bioattenuation zones (requiring the collection of analytical data within the upper five feet bgs, and the collection of soil vapor at a depth of five feet). Please address these new criteria in this investigation; it is anticipated that additional soil samples will be required in this round of investigation and in future rounds.
- 5. Request for a Site Investigation Report, SCM, and Data Gap Work Plan** - Please submit by the date identified below, a Site Investigation Report that includes an updated Site Conceptual Model (SCM), and a Data Gap Work Plan in order to fill any apparent data gaps.

As you are aware, a SCM synthesizes all the analytical data and evaluates all potential exposure pathways and potential receptors that may exist at the site, including identifying or developing any appropriate site cleanup objectives and goals. At a minimum, the SCM should include the following:

- Local and regional plan view maps that illustrate the location of sources (former facilities, piping, tanks, etc.) extent of contamination, direction and rate of groundwater flow, potential preferential pathways, and locations of receptors;
- Geologic cross section maps that illustrate subsurface features, man-made conduits, and lateral and vertical extent of contamination;
- Plots of chemical concentrations versus distance from the source;
- Complete summary tables of chemical concentrations in different media (i.e. soil, groundwater, and soil vapor); and
- Copies of well logs, boring logs, and well survey maps;
- Discussion of likely contaminant fate and transport, and
- Identification of any remaining data gaps, contaminant migration along preferential pathways such the sanitary sewer / storm drain system, or other.

Data gaps noted by ACEH include the following; however, are not limited to the following observations:

- a. Low-Threat Closure Data Gaps** - The LTCP requires changes in investigation styles and methods. Soil vapor data collected at a depth of five feet and the collection of soil analytical data within the top five feet bgs are a part of these changes. Additional data gaps may also be present.
- 6. Request for Emails** - If your email address is not listed on the first page of this letter, or in the list of cc's listed below, ACEH is requesting your email address to help expedite communications and to help lower overall costs. Because this is largely a paperless office, please provide that information in your next electronic submittal.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below, according to the following schedule:

- **December 14, 2012** – Revised Figure 2 (Work Plan Addendum)  
File to be named: RO320\_WP\_ADEND\_YYYY-MM-DD
- **February 8, 2013** – Soil and Groundwater Investigation Report, SCM and Data Gap Work Plan  
File to be named: RO320\_SWI\_SCM\_WP\_R\_YYYY-MM-DD
- **Sixty Days After Data Gap Work Plan Approval** – Site Investigation Report  
File to be named: RO320\_SWI\_R\_YYYY-MM-DD

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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

If you have any questions, please call me at (510) 567-6876 or send me an electronic mail message at [mark.detterman@acgov.org](mailto: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](mailto:pparmentier@thesourcegroup.net))

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

Marc Zeppetello, Barg Coffin Lewis & Trapp, LLP, 350 California Street, 22<sup>nd</sup> Floor, San Francisco, CA 94104-1435; (sent via electronic mail to [MAZ@bcltlaw.com](mailto: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](mailto: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](mailto:lgriffin@oaklandnet.com))

Donna Drogos, (sent via electronic mail to [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org))  
Mark Detterman (sent via electronic mail to [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))  
Electronic File, GeoTracker

**Attachment 1**  
**Responsible Party(ies) Legal Requirements/Obligations**

**REPORT/DATA REQUESTS**

These reports/data are being requested pursuant to Division 7 of the California Water Code (Water Quality), Chapter 6.7 of Division 20 of the California Health and Safety Code (Underground Storage of Hazardous Substances), and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations (Underground Storage Tank Regulations).

**ELECTRONIC SUBMITTAL OF REPORTS**

ACEH's Environmental Cleanup Oversight Programs (Local Oversight Program [LOP] for unauthorized releases from petroleum Underground Storage Tanks [USTs], and Site Cleanup Program [SCP] for unauthorized releases of non-petroleum hazardous substances) require submission of reports in electronic format pursuant to Chapter 3 of Division 7, Sections 13195 and 13197.5 of the California Water Code, and Chapter 30, Articles 1 and 2, Sections 3890 to 3895 of Division 3 of Title 23 of the California Code of Regulations (23 CCR). Instructions for submission of electronic documents to the ACEH FTP site are provided on the attached "Electronic Report Upload Instructions."

Submission of reports to the ACEH FTP site is in addition to requirements for electronic submittal of information (ESI) to the State Water Resources Control Board's (SWRCB) Geotracker website. In April 2001, the SWRCB adopted 23 CCR, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1 (Electronic Submission of Laboratory Data for UST Reports). Article 12 required electronic submittal of analytical laboratory data submitted in a report to a regulatory agency (effective September 1, 2001), and surveyed locations (latitude, longitude and elevation) of groundwater monitoring wells (effective January 1, 2002) in Electronic Deliverable Format (EDF) to Geotracker. Article 12 was subsequently repealed in 2004 and replaced with Article 30 (Electronic Submittal of Information) which expanded the ESI requirements to include electronic submittal of any report or data required by a regulatory agency from a cleanup site. The expanded ESI submittal requirements for petroleum UST sites subject to the requirements of 23 CCR, Division, 3, Chapter 16, Article 11, became effective December 16, 2004. All other electronic submittals required pursuant to Chapter 30 became effective January 1, 2005. Please visit the SWRCB website for more information on these requirements. ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](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, 7835, 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, late 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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> July 25, 2012
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (petroleum UST and SCP) 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](mailto: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](mailto: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.