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October 23, 2014

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Subject: Fuel Leak Case No. RO0000490 and GeoTracker Global ID T0600101187, San Francisco French Bread, 3924 Market Street, Oakland, CA 94607

Dear Responsible Parties:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Report of Soil and Groundwater Investigation (SWI)* dated December 30, 2013 prepared by Gribi Associates (Gribi) for the subject site. The review was performed against the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP).

The SWI was executed to define the extent of contamination resulting from fuel release(s) at the site. Based on its findings, the SWI proposes advancing four additional borings for recovery of soil and groundwater samples, collection of two soil gas samples, and decommissioning the on-site water supply well.

Work Previously Requested

In its Directive letter dated October 10, 2013, ACEH stated it had reviewed the case file including the *Work Plan to Conduct Soil Boring Investigation (Work Plan)* dated March 26, 2012. ACEH evaluated recommendations presented in the Work Plan, in conjunction with the LTCP criteria and determined that the site fails to meet the LTCP General Criteria e (Site Conceptual Model), and the Media-Specific Criteria for Groundwater and for Vapor Intrusion to Indoor Air. ACEH addressed the criteria not meeting the LTCP in the technical comments section of the letter and stated that a revised Work Plan was not required unless an alternate scope of work outside that described in the Work Plan and technical comments is proposed. However, numerous elements of the ACEH letter were not incorporated in the scope of work. The October 10, 2013 Directive letter is included as an attachment.

- ACEH requested (Directive Section 4) the following figures be provided in the requested Site Conceptual Model (SCM): an extended site map utilizing an aerial photographic base showing the facility in relation to its' immediate surrounding properties and a site map utilizing an aerial photographic base showing the showing on-site and off-site utilities in the immediate vicinity of the site, in relation to all boring and well locations, and the estimated areal extent of free product. An aerial photographic base for figures aid in the identification of receptors and landmarks.

The former figure was not provided and the latter figure was provided without utilizing an aerial photographic base.

- ACEH's noted that insufficient data has been collected in the 0 to 5 and 5 to 10 foot below ground surface intervals to support closure under the LTCP. ACEH requested (Directive Section 5) that on-site soil samples from each boring be recovered from two depths- within the upper five-feet and at least one sample from the interval of five- to 10 feet, as measured from below the ground surface (bgs).

The shallowest on-site soil sample was collected at 7 feet bgs.

- ACEH's noted that soil has not been tested for MTBE. Section 6a of the Directive referenced Health and Safety Code section 25296.15 which prohibits closing a UST case unless the soil, groundwater or both have been tested for MTBE. ACEH requested that MTBE be added to the scope of analysis for the soil samples. ACEH requested the analysis for benzene, toluene, ethylbenzene, and xylenes (BTEX) and MTBE be performed using and EPA test method 8260. Citing the SWRCB Leaking Underground Storage Fuel Tank Guidance (LUFT) Manual, dated September 2012, referencing sites with Bunker C releases, ACEH requested the 16 priority pollutant polycyclic aromatic hydrocarbons (PAHs) (naphthalene, acenaphthene, acenaphthylene, anthracene, phenanthrene, fluorene, chrysene, fluoranthene, pyrene, benzo(b)fluoranthene, benzo(a)pyrene, benzo(k)fluoranthene, benzo(a)anthracene, indeno(1,2,3-c,d)pyrene, dibenz(a,h)anthracene, and benzo(g,h,i)perylene be added to the scope of analysis at the site by using EPA test method 8270 SIM. Concentrations for these chemicals would be used to evaluate the site against the LTCP Direct Contact and Outdoor Air Exposure criteria for depths within the upper five feet and the interval of five- to 10 feet, bgs.

MTBE analysis was not performed for the soil samples. Additionally, BTEX analysis was performed by EPA test method 8021B.

Analysis for the 16 priority pollutant PAHs was not performed for the soil samples.

- ACEH's noted that the one groundwater monitoring event for which ACEH has MTBE data has elevated laboratory reporting limits of no less than 2,500 micrograms per liter (ug/L). These reporting limits exceed regulatory guidelines on which ACEH evaluates its cases. Section 6b of the Directive requested that MTBE and the 16 priority pollutant PAHs be added to the scope of analysis for the grab groundwater samples. ACEH requested the MTBE analysis be performed using and EPA test method 8260 and PAH analysis by EPA test method 8270.

MTBE analysis was not performed for the grab groundwater samples. Additionally, BTEX analysis was performed by EPA test method 8021B.

Analysis for the 16 priority pollutant PAHs was not performed for the grab groundwater samples.

- ACEH requested (Directive Section 7) the status of the on-site water well be determined, and if the well has not been decommissioned, to recover a water sample from the well and analyze for the chemicals identified in Section 6(b). If there are no future plans to use the well, ACEH requested the well be decommissioned.

The SWI does not address status of the well, nor was the well sampled or decommissioned. However, the SWI recommends the well be decommissioned.

- ACEH requested (Directive Section 8) clarification of the laboratory data reported for product samples collected from monitoring wells MW-1 and MW-3.

The SWI did not address this request.

- ACEH provided a sample Site Conceptual Model (SCM) in table format as an attachment to its Directive letter. The SCM included the requisite elements to be addressed in the SCM. ACEH requested the results of the field investigation be incorporated into a Focused SCM and the SCM be presented in a tabular format that highlights the major SCM elements and associated data gaps, which need to be addressed to progress the site to case closure under the LTCP.

Not all requisite elements were addressed in the SWI and the tabular format not followed.

Technical Comments

Based on its findings, the SWI proposes the following scope of work:

- Soil Borings- Advance four additional soil borings- two on-site and two off. ACEH concurs with the proposed four additional soil borings and their locations as depicted on Figure 7 of the SWI. ACEH requests the two on-site soil borings incorporate the sampling depths and analysis scope addressed in the comments above.
- On-site Water Supply Well- ACEH concurs with the proposed decommissioning of the on-site water supply well if the well is no longer in service. However, the well should be tagged and sampled prior to decommissioning. The scope of analysis should incorporate the analytical suite addressed in the comments above.
- Soil Gas Investigation- Advance two probes for the recovery of soil gas samples. Though there appears to be a lack of volatiles in soil and groundwater beneath the site, ACEH does believe a soil gas study is warranted at this time. Soil gas samples should be analyzed for total petroleum hydrocarbons as gasoline (TPHg), total petroleum hydrocarbons as diesel (TPHd), BTEX and naphthalene by test method TO-17, and the biogenic gases oxygen, carbon dioxide and methane, using test method ASTM-1946, to evaluate the biodegradation of the LNAPL plume. Additionally the soil gas samples should be analyzed for the tracer gas used for leak detection.

Additionally ACEH requests the following items be included in the work plan:

- Product Characterization- In order to assess the efficacy of free product removal, please present a plan to recover a sample of the free product from at least two monitoring wells for physical properties testing. Please present in your work plan requested below the physical properties (e.g. density and viscosity) needed to demonstrate free product removal is not practical.

- Well Search- Include in your work plan a proposal to identify beneficial use wells in the vicinity of the property.

Technical Report Request

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

- **December 12, 2014- Work Plan** (file name: RO0000490_WP_R_yyyy-mm-dd)

If your email address does not appear on the cover page of this notification ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Thank you for your cooperation. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Sincerely,

Keith Nowell PG, CHG
Hazardous Materials Specialist

- Attachment 1 Responsible Party(ies) Legal Requirements/Obligations ACEH Electronic Report Upload (ftp) Instructions
Attachment 2 ACEH Directive letter dated October 17, 2013

cc: Paul Phillips, Jeffries & Co, 11100 Santa Monica Blvd., 10th Floor, Los Angeles, CA 90025
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Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (*Sent via Email to: lgriffin@oaklandnet.com*)

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GeoTracker, File