

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SON 8-25-06

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

August 24, 2006

Ms. Teri Peterson
Cargill Salt Company
7220 Central Avenue
Newark, CA 94560-4205

Subject: SLIC Case No. RO0002480, Cargill Salt, 2016 Clement Street, Alameda, CA

Dear Ms. Peterson:

I am the caseworker currently assigned to this case. Please send any future correspondence regarding this case to my attention. Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site. The most recent report in our files is entitled, "Groundwater Monitoring Results, First through Fourth Quarter 2004, Cargill Salt - Alameda Facility, Alameda, California," dated November 7, 2005. The report, which was prepared by Crawford Consulting, Inc., presents the results of quarterly groundwater monitoring conducted at the site in 2004. During 2004, tetrachloroethene (PCE) was detected in groundwater at concentrations up to 4,100 micrograms per liter ($\mu\text{g/L}$) in well MW-2. The concentration of PCE detected in groundwater in two monitoring wells at the site exceeds Environmental Screening Levels (San Francisco Regional Water Quality Control Board February 2005) for indoor air vapor intrusion, drinking water toxicity, and estuary aquatic habitat goals. The concentration of PCE detected in soil at the site exceeds ESLs for direct exposure, vapor intrusion into buildings, and groundwater protection.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Source of VOCs.** The "Groundwater Monitoring Results, First through Fourth Quarter 2004, Cargill Salt - Alameda Facility, Alameda, California," dated November 7, 2005 indicates that, "the occurrence of VOCs in soil and groundwater at the site appears to be the result of a discharge or spill to surficial soils at a location near the rear property line at the southwestern corner of the property." Spills in an adjacent laundry room that could have drained onto the Cargill Salt property are identified as a possible source of the PCE. The report entitled, "Soil and Groundwater Investigations and Remedial activities, July 1993 - September 1994," dated July 31, 1995, prepared by Groundworks Environmental, Inc. indicates that, "soil to a depth of approximately 4 feet was determined to not be impacted," and was re-used as backfill in the excavation. Contaminated soil excavated from depths between 4 and 6 feet was apparently disposed off-site. The observation that soils down to a depth of 4 feet bgs were not impacted does not appear to be consistent with a surface spill. In the Work Plan requested below, please comment on the likely source of VOCs and use of the upper 4 feet of soils as backfill in the excavation.

2. **Potential Indoor Air Vapor Intrusion.** PCE is present in soil and groundwater at concentrations that exceed Environmental Screening Levels for potential indoor air intrusion (San Francisco Regional Water Quality Control Board February 2005). In order to further evaluate the potential for indoor air intrusion, we request that you conduct soil vapor sampling. Please present plans for soil vapor sampling in the Work Plan requested below.
3. **Remediation of PCE Source.** A small volume of soil (approximately 4 cubic yards) was excavated at the site in February 1994. The excavation extended to a depth of approximately 6 feet bgs but apparently the upper 4 feet of soil was used as backfill (see comment 1 above). Soil samples collected from soil boring AC-1, advanced in September 1994 outside the excavation, detected PCE at concentrations up to 31 milligrams per kilogram in soil at a depth of 10 feet bgs. Based on these data, impacted soil is present below the base of the excavation. In addition, elevated headspace readings were obtained in a soil boring north of the excavation. In the Work Plan requested below, please review these results and discuss the feasibility of additional soil removal or other remediation in the source area.
4. **Groundwater Monitoring.** We request that you conduct groundwater sampling of the four monitoring wells on a semi-annual basis. Please include plans to conduct groundwater monitoring in the Work Plan requested below.
5. **Metals in Surface Soils.** Five near surface soil samples were collected at the site on July 13, 1993 and analyzed for metals. Metals concentrations in three of the soil samples exceeded regulatory criteria. Impacted soils at these three locations were described in the report entitled, "Soil and Groundwater Investigations and Remedial activities, July 1993 – September 1994," dated July 31, 1995 as "casting sands," that were light and reddish-colored soils differing in appearance from the remaining surface soils at the site. Small excavations were performed at the three sampling locations where elevated concentrations of metals were detected. Following excavation of the surface soil, one confirmation soil sample was collected at each of the three small excavations. In the Work Plan requested below, please evaluate the adequacy of the surface soil sampling conducted to date to characterize metals concentrations in surface soils at the site given the high frequency of detection during the initial sampling event.
6. **Geotracker EDF Submittals** – Please note that electronic submittal of data to the State Water Resources Control Board's (SWRCB) Geotracker website will be required for future reports. Pursuant to CCR Sections 2729 and 2729.1, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload all SLIC analytical data post July 1, 2005, to the SWRCB's Geotracker database website in accordance with the above-cited regulation.

TECHNICAL REPORT REQUEST

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

- **November 10, 2006 – Work Plan**

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

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was 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

Ms. Teri Peterson
August 24, 2006
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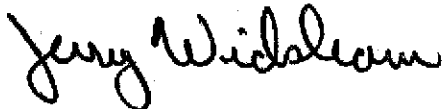
certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

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.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Mark Wheeler
Crawford Consulting, Inc.
2 North First Street, 4th floor
San Jose, CA 95113

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT
05-27-86

May 25, 2006

Ms. Barbara Ransom
Cargill Salt Company
7220 Central Avenue
Newark, CA 94560-4205

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

Subject: SLIC Case RO0002480, Cargill Salt, 2016 Clement Avenue, Alameda, CA

Dear Ms. Ransom:

Our records indicate that the current balance on the above-referenced SLIC oversight account is a negative \$1,381.50. In order to continue to provide regulatory oversight, we are requesting the submittal of a check made payable to Alameda County Environmental Health in the amount of \$4,500.00. Please send your check to the attention of our Finance Department.

This deposit may or may not be sufficient to provide all necessary regulatory oversight. ACEH will deduct actual costs incurred based upon the hourly rate specified below. If these funds are insufficient, an additional deposit will be requested. Otherwise, any unused monies will be refunded to you or your designee.

The deposit is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project is being debited at the Ordinance specified rate, currently \$166.00 per hour.

Please write "SLIC" (the type of project), the site address, and the AR# 0306005 on your check.

If you have any questions, please contact Jerry Wickham at (510) 567-6791.

Sincerely,



Ariu Levi
Division Chief

cc: D. Drogos, J. Jacobs, Jerry Wickham

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



07-0907

202480

CO0000103

July 3, 2001

Ms. Barbara Ransom
Cargill Salt
7220 Central Ave
Newark, CA 94560-4206

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

RE: Work Plan Approval for 2016 Clement Avenue, Alameda, CA

Dear Ms. Ransom:

I have completed review of Conor Pacific's June 2001 *Workplan for Off-Site Characterization* prepared for the above referenced site. Conor Pacific proposes to advance six soil borings on the residential property and five soil borings along Clement Avenue. Soil and grab groundwater samples will be collected to further characterize the VOC plume. Based on the groundwater analytical results, a groundwater monitoring well will be installed. The proposed workplan is acceptable. Field work should commence within 90 days of the date of this letter. Please provide at least 72 hours advance notice of field activities.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

email: Mark Wheeler

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



04-24-01

202480

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

CO0000103

April 19, 2001

Ms. Barbara Ransom
Cargill Salt
7220 Central Avenue
Newark, CA 94560-4206

RE: Offsite Investigation at 2016 Clement Avenue, Alameda, CA

Dear Ms. Ransom:

I have completed review of Crawford Consulting, Inc.'s (Crawford) April 2001 report, *Groundwater Monitoring Results First through Fourth Quarter 2000*, prepared for the above referenced site. Four consecutive quarterly groundwater monitoring results were presented in the report. Elevate volatile organic compounds (VOCs) were detected in wells MW-1 and MW-2.

Crawford recommended that additional investigations be conducted to delineate the extent of VOCs in groundwater offsite, among other tasks. This agency concurs with Crawford's recommendations. Please submit a workplan for conducting additional investigations within 60 days of the date of this letter, or by **June 21, 2001**.

If you have any questions, I can be reached at (510) 567-6762.

A handwritten signature in black ink, appearing to read 'eva chu'.

eva chu
Hazardous Materials Specialist

email: Mark Wheeler

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



FEB 09 2000

~~FEB 08 2000~~

CC'S

202480

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

StID 3835

February 8, 2000

Ms. Barbara Ransom
Cargill Salt
7220 Central Avenue
Newark, CA 94560-4206

RE: QMR for 2016 Clement Avenue, Alameda, CA

Dear Ms. Ransom:

I have completed review of Crawford Consulting Inc.'s January 2000 report, *Groundwater Characterization and Monitoring Well Installation*, prepared for the above referenced site. That report summarized activities during the collection of depth-discrete groundwater samples from two transects positioned across the vacant lot of the facility and the installation of three groundwater monitoring wells.

Investigations conducted to date reveal that the plume has migrated offsite to the northwest (towards residential properties) and northeast (across Clement Avenue). At this time, quarterly monitoring of the onsite wells should be initiated. Quarterly monitoring reports (QMRs) are due 60 days upon completion of field activities. A conduit study should also be prepared to determine if utilities beneath Clement Avenue may act as preferential pathways for the migration of VOCs in groundwater.

After another round of groundwater monitoring, offsite wells may be required near the fence line to the northwest and downgradient across Clement Avenue.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

email: Mark Wheeler (mark@crawfordconsulting.com)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO 2480

ENVIRONMENTAL HEALTH SERVICES

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

StID 3835

July 9, 1999

Ms. Barbara Ransom
Cargill Salt
7220 Central Avenue
Newark, CA 94560-4206

RE: Work Plan Approval for 2016 Clement Avenue, Alameda, CA

Dear Ms. Ransom:

I have completed review of Crawford Consulting, Inc.'s (Crawford) July 1999 *Workplan for Groundwater Characterization and Monitoring Well Installation* prepared for the above referenced site. Crawford proposed to conduct additional subsurface investigations in two phases. In the first phase, chlorinated volatile organic compounds (HVOCs) in groundwater will be profiled along two transects. Grab groundwater samples will be collected from 6.5, 11.5, 16.5, and 22.5 feet below grade surface. Data collected from this investigation will be used to determine the best location and screen interval for the three proposed groundwater monitoring wells (second phase).

The work plan proposal is acceptable. Field work should commence within 60 days of the date of this letter, or **by September 13, 1999**. Please notify this office at least 72 hours prior to the start of field activities.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: Mark Wheeler
Crawford Consulting
111 N. Market Street, Suite 634
San Jose, CA 95113-1100

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R02480

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

StID 3835

May 7, 1999

Ms. Barbara Ransom
Cargill Salt
7220 Central Avenue
Newark, CA 94560

**RE: Groundwater Monitoring Well Installation at 2016 Clement Avenue,
Alameda, CA**

Dear Ms. Ransom:

I have completed review of the case file for the above referenced site. Previous use of the site has resulted in the release of volatile organic compounds (VOCs) and metals to the subsurface. The extent of VOC contamination in soil and groundwater has been fairly well defined. Soil contaminated with metals has been excavated.

At this time permanent groundwater monitoring wells are required at the site, as well as off-site, to track the contaminant plume. A workplan for this phase of the investigation is due within 60 days of the date of this letter, or by **July 12, 1999**.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: Mark Wheeler
Crawford Consulting, Inc
111 N Market Street, Suite 634
San Jose, CA 95113-1100

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 2480

StID 3835

April 16, 1999

Ms. Barbara Ransom
Cargill Salt
7220 Central Avenue
Newark, CA 94560

**RE: Project #2330A, Add-on
at 2016 Clement Avenue, Alameda, CA**

Dear Ms. Ransom:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$2,500.00, payable to Alameda County, Environmental Health Services, within two weeks of receipt of this letter.

It is expected that the amount requested will allow the project to be completed with a zero balance. Otherwise, more money will be requested, or any unused monies will be refunded to you or your designee.

The deposit/refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$100 per hour.

Please be sure to write the following identifying information on your check:

project #2330/ Stid #3835
type of project (Mitigation, add-on), and
site address (2016 Clement Street, Alameda, CA)

If you have any questions, please contact me at (510) 567-6762.

eva chu
Hazardous Materials Specialist

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION (LOP)
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Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R02480

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

October 4, 1993

Ms. Barbara Ransom
Cargill Salt
7220 Central Avenue
Newark, CA 94560-4206

RE: Cargill Salt, 2016 Clement Avenue, Alameda, CA

Dear Ms. Ransom:

I have reviewed your "draft" Workplan for Remedial Activities dated September 30, 1993 for the above site. The workplan is acceptable, however, I would like more information on the following:

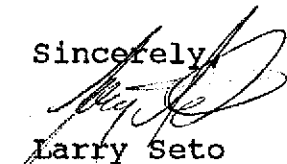
1. How were the sampling locations determined for the sampling that was performed on July 13, 1993?
2. Is the groundwater sample that will be taken from a bore hole near ASB-1 in the verified down-gradient direction from ASB-1?

Please address these issues in your final workplan.

Our office charges \$75.00 per hour for our services. Please submit a deposit/refund check to this office for \$714.00, made payable to the County of Alameda.

If you have any questions, please contact me or Kevin Tinsley at (510) 271-4320.

Sincerely,


Larry Seto
Sr. Hazardous Materials Specialist

cc: Ed Howell, Chief, Hazardous Materials
Kevin Tinsley, Hazardous Materials
Mark Wheeler, Groundworks Environmental, Inc.