



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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August 6, 2009

Mr. Tom McCoy
Brush Street Group, LLC
1155 3rd Street, Suite 230
Oakland, CA 94607

Subject: SLIC Case RO0002586 and Geotracker Global ID SL0600130797, Francis Plating, 751-785 7th Street, Oakland, CA 94607

Dear Mr. McCoy:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above referenced site including the document entitled, "*Work Plan for Additional Soil and Groundwater Investigation*," (Work Plan) dated June 19, 2009 and received by ACEH on June 24, 2009. Thank you for submitting the Work Plan, which was prepared in response to previous ACEH correspondence dated November 5, 2008. The Work Plan proposes the installation of four groundwater monitoring wells and sampling of one existing off-site monitoring well.

Based upon our review of the Work Plan and case file, an expanded scope of work beyond that proposed in the Work Plan is necessary to define the extent of contamination and to address the technical comments in our November 5, 2008 correspondence. Therefore, we request that you prepare a **Revised Work Plan by October 6, 2009** that addresses the following technical comments.

TECHNICAL COMMENTS

1. **Frog Pond Backfill and Removal of Concrete Column.** The Frog Pond appears to be filled with gravel and aggregate base. Although the Work Plan indicates that there are plans to pave the surface with asphalt or concrete, the Frog Pond is likely to act as an accumulation area for shallow groundwater. Shallow groundwater that accumulates in the Frog Pond may be hydraulically connected through the coarse-grained soils in the Frog Pond to the former concrete column excavation, which was backfilled with soil. Covering of the Frog Pond with pavement or concrete is acceptable as an interim measure to reduce infiltration; however, an additional permanent action will be required in the future to prevent groundwater infiltration into the Frog Pond and through the former sump which may now act as a vertical conduit. In the Revised Work Plan requested below, please present more detailed plans and a schedule for the interim impermeable cover to be placed over the Frog Pond.
2. **Monitoring Wells.** The proposed groundwater monitoring well locations are acceptable. Please describe the soil sampling methods for each monitoring well boring for logging and screening purposes as well as collection of soil samples for laboratory analyses. Given that the well screens for the proposed shallow monitoring wells will be 15 to 25 feet bgs, please

indicate whether the tops of the well screens will be submerged and adjust the depths accordingly. Please present your revised plans for monitoring well installation in the Revised Work Plan requested below.

3. **Vertical Delineation.** The Work Plan proposes collection of one soil sample from each soil boring at a depth of 5 feet bgs. In order to evaluate the vertical extent of contamination, additional soil sampling is required in the proposed deeper boring adjacent to the former sump and concrete column (MW-FP4B). In the Revised Work Plan requested below, please propose additional soil sampling to adequately define the vertical extent of elevated concentrations of metals in soil.
4. **Off-site Extent of Contamination.** The Work Plan currently proposes sampling of existing off-site well MW-9 or collection of one grab groundwater sample (B-FP32) along Sixth Street. The proposed scope of work is inadequate to delineate the off-site extent of groundwater contamination. Please propose an expanded scope of work that includes more than one off-site groundwater sample to define the off-site extent of contamination.
5. **Drainage Ditch in Rear Yard.** The Work Plan indicates that further investigation is not proposed at this time for the Rear Yard but would be revisited at a later date. Although the extent and nature of contamination related to the drainage ditch does not appear to be as significant as contamination in the area of the Frog Pond, we do not understand the rationale for delaying evaluation of the drainage ditch based on a comparison of the areas. The drainage ditch must be evaluated prior to making decisions regarding site remediation. Therefore, we request that you include investigation of the drainage ditch in the Revised Work Plan requested below. The Revised Work Plan is to include a discussion of the purpose and history of the drainage ditch including the types of discharges. In addition, please describe the fate of liquids discharged to the drainage ditch, whether they infiltrated into the ground or discharged to a sewer or sump.
6. **Source Materials.** The discussion of source material in the Work Plan adequately addresses our previous technical comment.
7. **Potential Vapor Intrusion.** The Work Plan indicates that soil vapor sampling would be conducted during a future phase of investigation since future remediation for metals contamination may affect subsurface conditions and the potential for vapor intrusion. Based on this rationale, we do not object to a phased approach to the investigation and implementing soil vapor sampling following development of plans for remediation or site redevelopment.
8. **Elevated Concentrations of Potential Vapor Intrusion.** Please review the detection of elevated concentrations of polycyclic aromatic hydrocarbons and the detection of cyanide in soil samples from boring B-FP7 in the Plating Building. In the Revised Work Plan requested below, please propose an investigation to define the extent of contamination.

TECHNICAL REPORT REQUEST

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

- **October 6, 2009** – Revised 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

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 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,

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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 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

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

Margot Lederer Prado, City of Oakland Economic Development Division, Brownfields
Management, 250 Frank H. Ogawa Plaza, Suite 3315, Oakland, CA 94612

Lydia Huang, Baseline Environmental Consulting, 5900 Hollis Street, Suite D, Emeryville,
CA 94608

Donna Drogos, ACEH
Jerry Wickham, ACEH
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