

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT  
9-25-06

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

September 21, 2006

Mr. Parwez Faizi  
Lucasey Manufacturing  
2744 East 11<sup>th</sup> Street  
Oakland, CA 94601

Subject: SLIC Case RO0002902, Lucasey Manufacturing, 2744 East 11<sup>th</sup> Street, Oakland, CA 94601 – Schedule Extension

Dear Mr. Faizi:

Alameda County Environmental Health (ACEH) staff has received a request for a schedule extension for the above-referenced Spills, Leaks, Investigations, and Cleanups (SLIC) case in correspondence dated September 11, 2006 from Matthew Ryder-Smith of Clearwater Group. In correspondence dated May 12, 2006, ACEH requested that you submit a Soil and Groundwater Investigation Report that presents the results of soil and groundwater sampling by September 29, 2006. The September 11, 2006 correspondence from Clearwater Group requests a six-month extension in order to resolve issues of identifying responsible parties.

A six-month extension prior to proceeding with the investigation work is not acceptable. However, we will allow a 60-day period to resolve any issues and begin the field investigation according to the schedule outlined in the Technical Report Request below. Therefore, we request that you 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 [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org)) prior to the start of field activities.

**TECHNICAL REPORT REQUEST**

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

- **November 30, 2006** – Begin Proposed Field Investigation
- **February 28, 2007** – Soil and Groundwater Investigation 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 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](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, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

Mr. Parwez Faizi  
September 21, 2006  
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**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: Matthew Ryder-Smith  
Clearwater Group  
229 Tewksbury Avenue  
Point Richmond, CA 94801

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT  
06-02-06

June 2, 2006

Mr. Lawrence Wadler  
Modern Mail Express Inc.  
2525 Mandela Parkway  
Oakland, CA 94608

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

Dear Mr. Wadler:

Subject: Fuel Leak Case RO0002901, Modern Mail Express Inc., 2836 Union St.,  
Oakland, CA 94607

Alameda County Environmental Health (ACEH) staff has received and reviewed the June 1, 2006 response letter from Stellar Environmental Solutions (SES) responding to the County's May 23, 2006 comment letter to the SES May 3, 2006 Workplan for Groundwater Characterization and Interim Corrective Actions, 2836 Union Street, Oakland, California. SES has adequately addressed our comments and you may proceed with the proposed remediation and investigation. However, please note the following technical comments:

- We understand that the removal of groundwater from the proposed excavation will be done to keep the excavation dry enough for sampling. Based upon pre and post-pumping groundwater results, your consultant will determine if additional pumping would be effective as interim remediation.
- The proposed location of borehole BH-14 should be relocated approximately 20' north, approximately in line with former boring BH-07. This location is considered to be within the strength of the contaminant plume from the former dispenser, assuming a southwest gradient.

If you have any questions, please call me at (510) 567-6765.

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

cc: files, D. Drogos  
Mr. Bruce Rucker, Stellar Environmental, 2198 Sixth St., Suite 201, Berkeley,  
CA 94701

6\_2\_06 2836 Union St

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



*put  
05-24-06*

May 23, 2006

Mr. Lawrence Wadler  
Modern Mail Express Inc.  
2525 Mandela Parkway  
Oakland, CA 94608

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

Dear Mr. Wadler:

Subject: Fuel Leak Case RO0002901, Modern Mail Express Inc., 2836 Union St.,  
Oakland, CA 94607

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the subject site including the May 3, 2006 Corrective Action Investigation and the May 3, 2006 Workplan for Groundwater Characterization and Interim Corrective Actions, 2836 Union Street, Oakland, California, prepared by Stellar Environmental Solutions, Inc. (Stellar). The Corrective Action Investigation provides the results of the April 2006 soil and groundwater investigation and the Groundwater Characterization and Interim Corrective Actions report proposes monitoring well installations and excavation and dewatering as interim remediation. We request that you address the following technical comments when performing the proposed work and submit the technical report requested below.

**TECHNICAL COMMENTS**

1. Interim Remediation- The interim corrective action proposes excavation of the area around the former dispenser to an estimated depth of 10', where groundwater is expected to be encountered. The exact dimensions may vary depending on the results of field observations. Four to six sidewall samples are proposed as post-excavation sampling. We approve this interim remediation and recommend that a frequency of one soil sample per every 20' be used for sampling the sidewalls and that one floor sample also be taken per every 400 square feet. In addition, infiltrating groundwater will be pumped from the excavation and future pumping will be considered as an option. An estimated 3000 gallons of water is anticipated for removal. Please clarify the rationale for amount and frequency for initial and post-excavation groundwater extraction.
2. Groundwater Characterization- It is apparent that the petroleum plume has migrated beneath the existing building. The one sample taken from inside the building, BH-07, detected elevated petroleum contamination in both soil and groundwater. Since this area is not proposed for excavation, we request that the plume be further characterized within the existing building. At least two additional borings should be advanced inside the building to better determine the dimensions of the plume. Please submit an amended figure 2, indicating these boring locations. We request that all borings be continuous cored and screened at soil depths every 2.5'. Soil samples exhibiting a PID reading, confirmed with

observed petroleum odor, should be analyzed in the laboratory for TVH-g, BTEX, MTBE and fuel oxygenates and the lead scavengers. In the absence of observation of contamination from screening, one soil sample at the capillary fringe should be analyzed.

3. Groundwater Monitoring Wells- Four monitoring wells are proposed, two are proposed to monitor the shallow 10' zone in addition to the deeper 20' zone. This is based upon the presence of a shallow permeable lens of sand and gravel observed in the borings on-site and the absence of this lens off-site in borings in Union St. The exact connection between the shallow and deeper zones is unclear. Site-specific gradient is also unknown, although groundwater concentration gradient indicates a northwest direction. We recommend that both zones be monitored in all wells. Five-foot screen intervals would appear appropriate. We request well clusters or multi-channeled wells for multi-level sampling. Ideally, at least one additional well from within the existing building should also be installed based upon the boring results.
4. Groundwater Monitoring- Quarterly monitoring should follow well installations.

#### TECHNICAL REPORT REQUEST

Please submit the following technical report according to the following schedule:

- June 25, 2006- Rationale for groundwater extraction and amended figure 2.
- 45 days after completion of investigation- Soil and Groundwater Investigation Report

#### ELECTRONIC SUBMITTAL OF REPORTS

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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](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

Mr. Lawrence Wadler  
May 23, 2006  
Page 3 of 3

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at [barney.chan@acgov.org](mailto:barney.chan@acgov.org).

### PERJURY STATEMENT

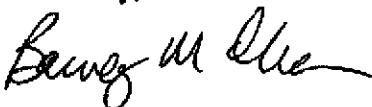
All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or 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.

If you have any questions, please call me at (510) 567-6765.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: files, D. Drogos  
Mr. Bruce Rucker, Stellar Environmental, 2198 Sixth St., Suite 201, Berkeley,  
CA 94701

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT  
03-21-06

March 20, 2006

Mr. Lawrence Wadler  
Modern Mail Express Inc.  
2525 Mandela Parkway  
Oakland, CA 94608

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

Dear Mr. Wadler:

Subject: Fuel Leak Case RO0002901, Modern Mail Express Inc., 2836 Union St.,  
Oakland, CA 94607

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the subject site including the December 22, 2005 Workplan for Corrective Action Investigation 2836 Union Street, Oakland, California prepared by Stellar Environmental Solutions, Inc. (Stellar). The work plan follows up the previous November 2005 investigation at this site, which identified areas of residual petroleum contamination near the former dispenser, within the former tank pit and west of the tank pit, presumably in the down-gradient groundwater direction. The work plan proposes additional borings and soil and groundwater sampling to determine the lateral extent of petroleum contamination and determine appropriate remedial actions. We request that you address the following technical comments when performing the proposed work and submit the technical report requested below.

**TECHNICAL COMMENTS**

1. We request that all borings be continuous cored and screened at soil depths every 2.5'. Soil samples exhibiting a PID reading, confirmed with observed petroleum odor, should be analyzed in the laboratory for TVH-g, BTEX, MTBE and fuel oxygenates and the lead scavengers. In the absence of observation of contamination from screening, one soil sample at the capillary fringe should be analyzed.
2. We notice that four borings are proposed around the former dispenser area for soil sampling only. Groundwater sampling should be sufficient to determine the extent of the petroleum plume. Therefore, we recommend groundwater sampling also be done from samples within the Union St. building and from at least one sample between the dispenser and boring BH-02. Additional sampling within the building is recommended if significant contamination is observed in the lone boring within the building.
3. To complete groundwater delineation, we recommend one additional boring to the east of the former tank pit to determine the up-gradient extent of contamination. Please sample soil as stated in comment #1, above.



4. Please include a recommendation for groundwater monitoring and remediation in your soil and groundwater investigation report.

#### TECHNICAL REPORT REQUEST

Please submit the following technical report according to the following schedule:

- 45 days after completion of investigation- Soil and Groundwater Investigation Report

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**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.

If you have any questions, please call me at (510) 567-6765.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: files, D. Drogos

Mr. Bruce Rucker, Stellar Environmental, 2198 Sixth St., Suite 201, Berkeley,  
CA 94701

3\_20\_06 2836 Union St