



2744 East 11th St., Oakland, CA 94601
P.O. Box 14023, Oakland, CA 94614
www.lucasey.com

Phone: 510-534-1435
1-800-582-2739
Fax: 510-534-6828

RECEIVED

By Alameda County Environmental Health at 4:41 pm, Jul 19, 2013

07/18/2013

Mr. Jerry Wickham
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502

Subject: Lucasey Manufacturing
2744 East 11th Street
Oakland, CA 94601
RO0002902

Dear Mr. Wickham:

As the legally authorized representative of the above-referenced project location, I have reviewed the Response to ACEH Case File Review (5/15/13) prepared by my consultant of record, ERM. I declare, under penalty of perjury, that the information and/or recommendations contained in this report are true and correct to the best of my knowledge.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Lucasey", written in a cursive style.

Mr. Charles Lucasey
Lucasey Manufacturing

**Environmental
Resources
Management**

1277 Treat Boulevard
Suite 500
Walnut Creek, CA 94597
(925) 946-0455
(925) 946-9968 (fax)

18 July 2013

Mr. Jerry Wickham
Alameda County Health Care Services
Environmental Health Care Department
Environmental Protection
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577



Subject: Response to 5/15/13 Case File Review Letter
Lucasey Site- 2744 East 11th Street, Oakland

Dear Mr. Wickham:

Thank you for your letter of May 15, 2013 re Case File Review for SLIC Case RO0002902 and Geo Tracker Global ID T0600133151 Lucasey Manufacturing, 2744 East 11th Street, Oakland, CA 94601 ("5/15/13 Case Review Letter").

Lucasey Manufacturing acknowledges the 5/15/13 Case Review Letter concluded: "based on the results presented [as detailed in the 5/15/13 Case Review Letter the case meets the criteria in the Low Threat Closure Policy] ACDEH will consider case closure."

In response to that decision and as requested in the 5/15/13 Case Review Letter, Lucasey has prepared a draft Notification of Case Closure for ACDEH review. The draft is attached as Exhibit A.

According to the State Water Resources Control Board ("SWRCB") *Low Threat Underground Storage Tank Case Closure Policy* (August 17, 2012), notification of case closure is provided by the regulatory agency. (See SWRCB website, *Low Threat Underground Storage Tank (UST) Case Closure Policy (Policy)*, *Frequently Asked Questions (FAQ)*, *Low Threat Case Closure*; a copy of which is attached hereto as Appendix A). Accordingly, we prepared the requested draft case closure notifications for ACDEH letterhead.

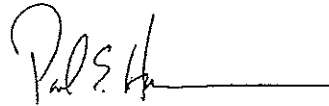
Mr. Jerry Wickham
18 July 2013
Page 2

If you have any questions or concerns regarding this submittal, please don't hesitate to contact either of the undersigned at 925.946.0455.

Sincerely,



John Moe
Project Manager



Paul Hausmann
Partner-in-Charge

JCM/Enclosure
Cc: Charles Lucasey

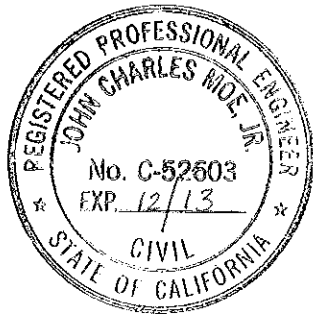


EXHIBIT A

DRAFT NOTIFICATION OF CASE CLOSURE

ACEH LETTERHEAD

2735 East 11th Street
Oakland, California 94601

2741 East 11th Street
Oakland, California 94601

2739 East 11th Street
Oakland, California 94601

2743 East 11th Street
Oakland, California 94601

**Subject: Notification of Potential Low-Threat Case Closure
Lucasey Manufacturing, 2744 East 11th Street, Oakland, CA 94601**

Dear Owners and/or Residents:

The Lucasey Manufacturing, Inc. site is located at 2744 E. 11th Street in Oakland, California as shown on the attached figure (the "Site"). Lucasey fabricates television mounting systems. The property occupied by Lucasey was formerly a cannery and canned food warehouse; the cannery ceased operation more than 30 years ago.

Soil, groundwater and soil vapor investigations were conducted at and in the vicinity of the Site under direction of the Alameda County Environmental Health Department (ACEH). The investigations detected the presence of petroleum hydrocarbons in soil and groundwater at the Site itself and beneath E. 11th St. to the southwest of the Site. The investigations confirmed the petroleum hydrocarbon present is aged and consisted of heavy fuel oil.

ACEH requires that, prior to Site or case closure, a detailed notification should be provided to certain adjacent landowners and residents where residual contamination from the Site might impact residences.

RESULT OF INVESTIGATIONS

The possible source of the petroleum hydrocarbons was an underground storage tank on the Site that once contained fuel oil; the fuel oil was used to heat the boilers when the cannery was in operation. Fuel oil or other petroleum products have not been stored underground nor used at the Site since the early 1970s. The cannery switched over to natural gas at that time and, in or about 1978, ceased operation.

The investigations concluded the petroleum hydrocarbons had been present in the soil and ground water for many years and had ceased spreading. Groundwater is present at approximately 12 feet below the ground surface and generally flows toward the west.

HEALTH RISK ANALYSIS

Because residences are present in this area, consultants evaluated the potential risk of adverse health effects posed by the possible presence of petroleum hydrocarbons to residents at adjacent properties. To provide information for the health risk evaluation, these consultants conducted a door-to-door survey in the residential area. The survey asked residences about the existence of subgrade basements, current or abandoned water supply wells, or sumps on their properties. The survey provided the following information:

- Most of the residences have slab on-grade construction, with no basements. One residence (2735 E. 11th St.) has a basement living space extending approximately three to four feet below the ground surface.
- No residences reported the existence of active or abandoned wells.
- No residences reported the existence of sumps.

Based on the above survey and the analytical data, including soil vapor test results collected at or in the vicinity of the residences, the consultants analyzed for health risks to the residences, including accounting for residences with or without basements. The health risk analysis concluded:

- Because the contaminated soils are at or below 10 feet below ground surface, direct exposures to soils in the residential area does not represent a human health risk.
- There is no evidence that ground water is used for any purpose by residents, nor is it likely that any excavation or planting would be deep enough, assuming contamination is present, to encounter impacted ground water. Since there is no direct exposure to groundwater in the residential area the groundwater does not represent a human health risk.
- Samples of soil vapor collected in the vicinity of the residences do not exceed regulatory levels. As neither the soil or groundwater emits volatile constituents the possible presence of the petroleum does not represent a human health risk.

Based upon these multiple lines of evidence, concentrations of petroleum hydrocarbons detected in off-site residential locations are not likely to present a health risk to off-site residents.

AVAILABILITY OF REPORT/ANALYSIS

Reports documenting past investigations and analysis can be viewed online at the following locations:

- ACEH website: <http://www.acgov.org/aceh/index.htm>

SLIC Case RO0002902

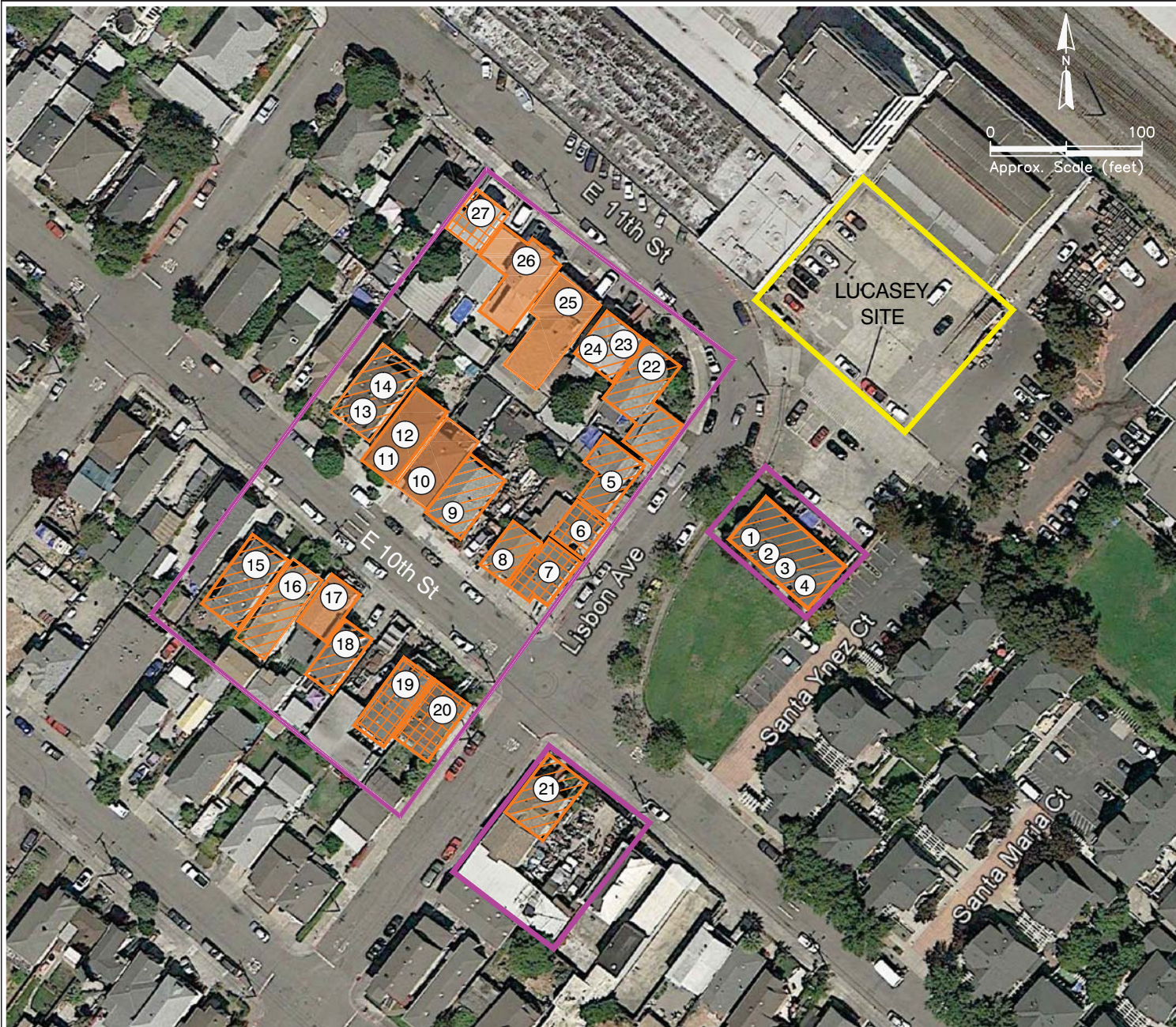
- State Water Resources Control Board GeoTracker website
<http://geotracker.waterboards.ca.gov/>
GeoTracker Global ID 0600133151)

ACEH CONCLUSION

ACEH has reviewed the investigations and analyses conducted regarding the Site and the adjacent area, including the health risk analysis.

Based on those investigations and analysis and ACEH's review of each of them, ACEH will consider case and Site closure without requiring further investigation, analysis, or remedial action.

Sincerely,



LEGEND

- Lucasey Site
- Survey Areas
- No Basement Present
- Basement/Subgrade Space Present
- No Response

ID	Address
1	1001 Santa Inez Court
2	1011 Santa Inez Court
3	1021 Santa Inez Court
4	1031 Santa Inez Court
5	1021 Lisbon Avenue
6	1011 Lisbon Avenue
7	2748 E 10th Street
8	2742 E 10th Street
9	2736 E 10th Street
10	2732 E 10th Street
11	2728 E 10th Street
12	2730 E 10th Street
13	2720 E 10th Street
14	2722 E 10th Street
15	2721 E 10th Street
16	2725 E 10th Street
17	2733 E 10th Street
18	2737 E 10th Street
19	2745 E 10th Street
20	2749 E 10th Street
21	2801 E 10th Street
22	2743 E 11th Street
23	2739 E 11th Street
24	2741 E 11th Street
25	2735 E 11th Street
26	2731 E 11th Street
27	2721 E 11th Street

Figure 1
*Door-to-Door Survey
Lucasey Manufacturing
2744 East 11th Street
Oakland, California*