

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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August 23, 2007

Mr. Chris Lucasey
Lucasey Manufacturing Corporation
P.O. Box 14023
Oakland, CA 94614-2023

Subject: SLIC Case RO0002902 and Geotracker Global ID T0600133151, Lucasey Manufacturing, 2744 East 11th Street, Oakland, CA 94601

Dear Mr. Lucasey:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above-referenced site, including the recently submitted document entitled, "Phased Soil and Groundwater Investigation and Recovery Well Installation Workplan," dated July 6, 2007. In our previous April 6, 2007 correspondence, ACEH requested that you prepare a Work Plan that includes two phases of investigation. The first phase of investigation was to define the extent of free phase product and the dissolved phase plume to the west, south, and north of the existing borings using soil sampling and grab groundwater sampling. The second phase of investigation was to include installation of monitoring and free product recovery wells.

The "Phased Soil and Groundwater Investigation and Recovery Well Installation Workplan," dated July 6, 2007, which was prepared by Clearwater Group, proposes a scope of work that includes a passive soil vapor sampling survey and installation of two monitoring/recovery wells. As described in the technical comments below, we have several concerns with the proposed scope of work. Therefore, we request that you prepare a revised Work Plan that addresses the technical comments below.

TECHNICAL COMMENTS

1. **Gore-sorber® Survey.** The Work Plan proposes a passive soil vapor survey using Gore-sorber® modules to, "establish the extent and distribution of potential TPHd and TPHmo contamination in soil and groundwater." As described in the Work Plan, the Gore-sorbers® modules will be analyzed using a modified EPA 8260 method. EPA Method 8260 detects volatile organic compounds such as BTEX and can also be used to quantify TPH as gasoline. Contamination at the site consists of heavy hydrocarbons in the diesel and motor oil range. Benzene, toluene, ethylbenzene, and xylenes (BTEX) were not detected in soil samples previously collected at the site and were not detected in groundwater samples at concentrations greater than 1.7 micrograms per liter. Site conditions are described as predominantly fine-grained soils. Given these conditions, we do not concur that soil vapor sampling would be useful to define either the extent of free product or the dissolved phase plume. Please propose revised methods for delineating the extent of free product and dissolved phase hydrocarbons. Alternately, please provide substantiation that the Gore-

sorber® survey would delineate the extent of TPH as diesel and TPH as motor oil both on site and off-site.

2. **Extent of Free Product South and West of Site.** Three proposed borings (SB-18 through SB-20) along Lisbon Street were not completed and two proposed borings were not sampled (SB-16 and SB-17) during the field investigation completed in January 2007. The field investigation was apparently stopped due to budgetary constraints. These borings would have provided additional information on free product and plume extent southwest of the site. Please present plans for soil borings in the revised Work Plan requested below to define the extent of free product west, south, and north of the site. As previously noted, this additional subsurface investigation will require access agreements with adjacent landowners and encroachment permits from the City of Oakland.
3. **Proposed Recovery Wells Locations.** The Work Plan proposes the installation of two wells for free product recovery. Well RW-1 is proposed at a location labeled, "oil tank in ground," on a 1950 Sanborn Fire Map. Well RW-2 is proposed adjacent to previous soil boring SB-14. Both proposed free product recovery wells are outside the area marked, "Estimated Free Product Boundary," on Figure 14 of the "Soil and Groundwater Investigation Report," dated March 7, 2007. Please review these locations with respect to previous data to assure that the wells are proposed in optimal locations for free product recovery. Present this review in the revised Work Plan requested below.
4. **Proposed Recovery Well Depth.** The Work Plan proposes that the recovery wells be screened from 10 to 25 feet bgs to accommodate, "seasonal groundwater fluctuations." Please note that a 15-foot well screen is not necessary to accommodate seasonal groundwater fluctuations, which are generally on the order of a few feet or less. We request that the screen interval for the recovery wells be no greater than 10 feet.
5. **Report Figures.** The quality of the figures in the July 6, 2007 Work Plan is not as good as the quality of the figures in the previous "Soil and Groundwater Investigation Report," dated March 7, 2007. In future reports, please use similar methods for electronic formatting to that used in the March 7, 2007 report.
6. **Underground Storage Tanks.** A geophysical survey was conducted in the area of former USTs by Subtronic Corporation on November 25, 2005. The Work Plan reports that no subsurface tanks were interpreted from the field data; no other description of the geophysical survey results is provided. Please clarify whether the results of the geophysical survey are presented in a report. The geophysical survey report is to be submitted with the revised Work Plan requested below.
7. **Request for Identification of Adjacent Property Owners.** Public participation is a requirement for the Corrective Action Plan process. In order to provide notification to potentially affected members of the public, please provide a list of all properties, which are currently or may in the future be directly or indirectly affected by the petroleum release from your site or the proposed corrective action. The list is to identify the properties by street address, parcel number, and property owner name. Please also provide a map showing the street address for each of the listed properties. A current mailing address is to be

included for each property owner. ACEH will notify each of the property owners on the list of the proposed investigation.

TECHNICAL REPORT REQUEST

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

- **October 12, 2007** – 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

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.

Mr. Chris Lucasey
RO0002902
August 23, 2007
Page 4

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.

UNDERGROUND STORAGE TANK CLEANUP FUND

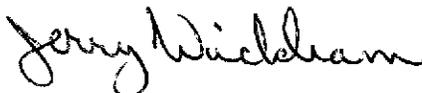
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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: Parwez Faizi, Lucasey Manufacturing, 2744 East 11th Street, Oakland, CA 94601

Matthew Ryder-Smith, Clearwater Group, 229 Tewksbury Avenue, Point Richmond, CA 94801

Robert Nelson, Clearwater Group, 229 Tewksbury Avenue, Point Richmond, CA 94801

Donna Drogos, ACEH
Jerry Wickham, ACEH
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