



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

January 18, 2012

Mr. Walter Pierce
Western Forge & Flange Co.
687 Country Rd 2201
Cleveland, TX 77327
(sent via electronic mail to wpierce@western-forge.com)

Subject: Request for a Work Plan Addendum; Spills, Leaks, Investigations and Cleanup (SLIC)
Case No. RO0003009 and Geotracker, Global ID # T10000001598; Western Forge &
Flange, 540 Cleveland Ave. Albany, CA 94706

Dear Mr. Pierce:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the *Response to Technical Comments* and *Data Gap Work Plan* submitted as a single document, dated September 23, 2010, the *December 2010 Report, Subsurface Environmental Activities*, dated December 14, 2010, and the *Work Plan for Remedial Investigation*, dated November 18, 2011 (and received November 30, 2011). The first and second documents were submitted on your behalf by Chemical Data Management Systems, while the third was submitted by Ninyo & Moore, Inc. Thank you for the documents.

Based on ACEH staff review of the referenced documents and of the case file we generally concur with the recently proposed scope of work, provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. While the comments below request a number of additional soil bores, submittal of a revised Work Plan is limited to a revised Figure 6, unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed. We request that you address the following technical comments, and upon ACEH approval of the revised Figure 6, perform the proposed work, and send us the technical reports requested below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Request for additional sample locations** – The November 2011 work plan referenced above proposes to install up to 20 soil bores to define the lateral and vertical extent of contamination at the site. Eighteen bores were placed on Figure 6 of the work plan, and two bores were held in reserve for field placement. This is a reasonable approach; however, ACEH requests the installation of additional bores at the following locations. ACEH requests only a work plan addendum prior to commencement of field work (a revised Figure 6), to depict the location of additional sample locations, by the date identified below.
 - a. **East of Ring Roller Pit** – The eastern sidewall of the Ring Roller Pit (RRP) does not appear to have been sampled previously; thus the lateral extent of contamination to the east is undefined. Rather than to sample the sidewall, which is suspected to be heavily impacted by the residual free-phase hydraulic oil, ACEH requests the installation of a minimum of one soil bore to the east of the pit to define the lateral extent in that direction. ACEH further requests the bore be proximal to the current extent of the excavation (e.g. similar in distance as proposed bores B-6, B-8, B-9, or B-10).

- b. Pit 1 and 2 Sampling** – Four perimeter corner excavations were placed around Pits 1 and 2 in an attempt to determine if hydraulic oil was present similar to the Ring Roller pit; however, no analytical data appears to have been collected to document the lack of concentrations of concern; only statements are available. It is understood that free phase hydraulic oil was not encountered in these perimeter excavations. It is also understood that Pits 1 and 2 are floored with concrete. As a consequence, ACEH requests the installation of two soil bores in close proximity to each pit location (for a total of four bores). It is understood that bore locations 101, 102, 014, and 105 appear to indicate limited contamination in these areas; however, the lack of understanding of the sample collection protocols, sample selection criteria, and perhaps lack of laboratory reports to support the statements indicate a need for clarification as provided by additional data.
- c. Roof Blowdown Soil Bore** – A shallow soil bore was proposed for this area (in the vicinity of previously collected soil sample 111) by CDMS in the September 2010 work plan and it appears that the soil sample labeled “back” may be the referenced sample associated with this bore; however, this is not discussed in the text of the resulting CDMS December 2010 report. If correctly surmised, the soil sample was only analyzed for copper. As such, the soil sample appears to indicate copper concentrations are below ESLs at a depth of 1 foot below grade surface (bgs); however, do not resolve the concentration of zinc which were over ESLs in soil sample 111 at a depth of 0.5 feet bgs. The soil sample does not laterally define the extent of zinc contamination, and does not further define hydrocarbon contamination. While it is understood that the detected residual hydrocarbon concentration is below ESLs, the analytical results from sample 111 appear to indicate that the area has been re-impacted by blowdown processes since the original remedial work in the 1980’s; thus the installation of additional shallow soil bores appears appropriate. Due to the presence of elevated nickel concentrations in the grab groundwater sample collected at bore 111, it would also be appropriate to include nickel in the list of analytes for this vicinity; however, to fully determine all potential metal contaminants in this vicinity, ACEH requests submittal of multiple soil samples for a full CAM 17 analyses (see Technical Comment 3 below). Thus ACEH additionally requests the lateral and vertical delineation of metals contamination, including, but not limited to zinc, nickel, and copper, as well as hydrocarbon contamination at this location. To do so it would be appropriate to install a series of systematic step-out surface and shallow soil bores to collect soil samples. It is reasoned that these locations can be depicted on the Figure 6 work plan addendum to communicate spacing intent. The collection and analysis (CAM 17, TPHho, PCBs; see Technical Comment 3) of grab groundwater samples is also requested.
- d. UST Soil Bores** – The CDMS *Closure Plan* (for the facility), dated July 2007, indicates that a diesel UST was present at the site; however, the UST does not appear to be investigated. CDMS site plans reference a “diesel tank” and appear to indicate that soil bore 1 was installed in the general vicinity, but appears to be located upgradient of the tank. As a consequence ACEH requests the installation of a minimum of two soil bores at the presumed former UST location, or slightly downgradient, as known by site proponents or as depicted in CDMS figures. ACEH requests these bore locations include by groundwater sampling, both for diesel related constituents.

Please report the results of the field work in the soil and groundwater investigation report requested below.

- 2. Groundwater Sampling** – The sampling of pit water in the Ring Roller Pit was proposed in the September 2010 work plan. Groundwater sample RRP was subsequently collected and contained 280,000 µg/l TPH as hydraulic oil (TPHho). The groundwater sample additionally contained lead, copper, and nickel over the ESLs for non-drinking water (not currently established as non-drinking water quality with salinity or specific conductivity measurements) and over Aquatic Habitat Impact ESLs. ACEH requests the collection of additional groundwater samples from the excavations that reached groundwater to help determine the extent to which hydraulic oil may impact groundwater beneath the site, and to help evaluate the success of treatment of groundwater in these excavations by RegenOx. ACEH further requests collection of multiple salinity and specific conductivity measurements to determine the resource potential of groundwater beneath the site. Finally ACEH

requests either field or laboratory filtration of all groundwater samples collected for metal analysis (and acidification as thereafter appropriate), and documentation of these procedures in the report requested below.

3. Proposed Soil and Groundwater Analysis – ACEH has the following technical comments on the proposed analytical program:

a. Soil Analysis - It is understood that planned soil samples will be analyzed for TPHho (with silica-gel cleanup – SGC), CAM 17 metals, and PCBs. As proposed five soil samples will be selected for CAM 17 analyses, including hexavalent chromium; two or three samples for PCBs, and two or three samples were proposed for a full EPA 8260B analysis; however, a sample selection criteria was not provided. ACEH requests that CAM 17 metals, PCB, and full EPA 8260B analysis be conducted on a minimum of 50% of the highest TPHho soil samples. This is requested to be spread throughout all use areas. The requested analytes are appropriate for hydraulic oil investigations.

ACEH is in agreement that the extent of soil contamination requires both lateral, as well as vertical delineation.

b. Groundwater Analysis - The referenced work plan also proposes the collection of five grab groundwater samples with analysis for TPHho with SGC, and CAM 17, but provides no sample collection criteria. ACEH requests the collection of grab groundwater samples from all bore locations, and analysis for TPHho (with SGC), CAM 17, and a full EPA 8260B analysis at each bore location. Analysis for PCBs should be conducted on a minimum of 50% of the highest TPHho analytical results.

4. Request for Soil and Groundwater Investigation Report – Please provide ACEH with a soil and groundwater investigation report, by the date identified below, that includes, but is not limited to, copies of bore logs, inclusive of PID readings, a complete tabulation of all recent analytical results available for the site, and sufficient cross sections to illustrate the subsurface as appropriate.

TECHNICAL REPORT REQUEST

Please submit the following deliverables and technical reports to ACEH (Attention: Mark Detterman), according to the following schedule:

- **February 20, 2012** – Work Plan Addendum (Revised Figure 6)
- **April 16, 2012** – 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.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

Mr. Walter Pierce
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Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations
Electronic Report Upload (ftp) Instructions

cc: Kris Larson, Ninyo & Moore, 1956 Webster Street, Suite 400, Oakland, CA 94612; (sent via electronic mail to klarson@ninyoandmoore.com)

Donna Drogos, ACEH, (sent via electronic mail to donna.drogos@acgov.org)

Mark Detterman, ACEH, (sent via electronic mail to mark.detterman@acgov.org)

Geotracker, Electronic Files

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

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/electronic_submittal/report_rqmts.shtml).

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.

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

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.

REQUIREMENTS

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- **Signature pages and perjury statements must be included and have either original or electronic signature.**
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Submission Instructions

- 1) Obtain User Name and Password
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to dehloptoxic@acgov.org
 - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses,** and the **Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload.** (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.