



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

August 28, 2013

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

Subject: Approval of Corrective Action Plan and Addendum; Site Cleanup Program (SCP) 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 including the revised *Draft Public Comment Fact Sheet*, dated July 31, 2013, the *Revised Data Gap Investigation Report and Corrective Action Plan*, dated May 15, 2013, and the *Corrective Action Plan Addendum*, dated July 22, 2013. The documents were prepared on your behalf by Ninyo & Moore. Thank you for submitting the documents.

The *Revised Data Gap Investigation Report and Corrective Action Plan* proposes the targeted excavation of soil at 12 to 14 source areas in order to remove heavy metal and Total Petroleum Hydrocarbon as hydraulic oil (TPHho) contamination, the dewatering of excavations that encounter groundwater that is generally found at a depth of 3 to 4 feet below surface grade (bgs), removal of Light Non-Aqueous Phase (LNAPL) product, the collection of confirmation soil samples to validate the extent of soil removal, and the installation of three groundwater monitoring wells to monitor groundwater concentrations and natural attenuation of TPHho and metals. The *Corrective Action Plan Addendum* responded to comments contained in an ACEH directive letter dated June 28, 2013 in regards to determining the cleanup goals for two of the metals of concern (cobalt and arsenic), the number and placement of confirmation samples, stockpile management, the proposed analytical suite, groundwater monitoring well placement locations, the use of import fill (concrete and soil), and a request that a landowner notification form be filled out.

ACEH conditionally approves the Draft Corrective Action Plan (CAP) for implementation. Conditional approval is contingent on completion of the public participation notification comment period, addressing all comments received, and, if necessary, incorporating changes to the CAP to address or mitigate the comments, as requested below. We request that you address the following technical comments and send us the documents described below.

TECHNICAL COMMENTS

- 1. Public Participation Notification** – The proposed scope of work to perform remedial excavation and groundwater dewatering is acceptable for public comment at this time. Therefore, we request that you distribute the revised Fact Sheet to the mailing list (Attachment 2). Following distribution of the Fact Sheet, please provide your personal certification by e-mail or letter to ACEH, that the Fact Sheet was distributed by U.S. Mail to the attached mailing list no later than September 6, 2013.

At the end of the 30-day public comment period, ACEH requests that you address all public comments received. Final approval of the CAP will be provided by written notification from ACEH. If no public comments are received, ACEH will approve implementation of the CAP.

2. Landowner Notification - This is a second request for the submittal of a completed Landowner Notification form. Please be aware that all landowners must be notified of the proposed corrective actions as discussed in Technical Comment 1 above. Failure to submit the landowner notification form will delay the implementation of corrective actions due to the need to observe a 30 day comment period for all parties. Pursuant to Section 25297.15 (a), ACEH, the local agency, shall not consider cleanup or site closure proposals from the primary or active responsible party, issue a closure letter, or make a determination that no further action is required with respect to a site upon which there was an unauthorized release of hazardous substances from an underground storage tank subject to this chapter unless all current record owners of fee title to the site of the proposed action have been notified of the proposed action by the primary or active responsible party. ACEH is required to notify the primary or active responsible party of their requirement to certify in writing to the local agency that the notification requirement in the above-mentioned regulation has been satisfied and to provide the local agency with a complete mailing list of all record fee title owners.

To satisfy the above-mentioned requirement, please complete the enclosed *List of Landowners Form* (Attachment B) and mail it back to ACEH by the date specified below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below, according to the following schedule:

- **July 19, 2013** - Landowner Notification Form – Late
File to be named: RO3009_LNDOWNR_F_yyyy-mm-dd
- **September 13, 2013** – Personal Certification of Public Notification
File to be named RO3009_CORRES_L_yyyy-mm-dd
- **October 18, 2013** – List and Response to Public Comments
File to be named RO3009_CORRES_L_yyyy-mm-dd

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

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

Attachment 2 – *Fact Sheet on Environmental Assessment*

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

Cem Atabek, Ninyo & Moore, 1956 Webster Street, Suite 400, Oakland, CA 94612; (sent via electronic mail to catabek@ninyoandmoore.com)

Dilan Roe (sent via electronic mail to dilan.roe@acgov.org)

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

Electronic File, GeoTracker

Attachment 1

Responsible Party(ies) Legal Requirements/Obligations

REPORT/DATA REQUESTS

These reports/data are being requested pursuant to Division 7 of the California Water Code (Water Quality), Chapter 6.7 of Division 20 of the California Health and Safety Code (Underground Storage of Hazardous Substances), and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations (Underground Storage Tank Regulations).

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (Local Oversight Program [LOP] for unauthorized releases from petroleum Underground Storage Tanks [USTs], and Site Cleanup Program [SCP] for unauthorized releases of non-petroleum hazardous substances) require submission of reports in electronic format pursuant to Chapter 3 of Division 7, Sections 13195 and 13197.5 of the California Water Code, and Chapter 30, Articles 1 and 2, Sections 3890 to 3895 of Division 3 of Title 23 of the California Code of Regulations (23 CCR). Instructions for submission of electronic documents to the ACEH FTP site are provided on the attached "Electronic Report Upload Instructions."

Submission of reports to the ACEH FTP site is in addition to requirements for electronic submittal of information (ESI) to the State Water Resources Control Board's (SWRCB) Geotracker website. In April 2001, the SWRCB adopted 23 CCR, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1 (Electronic Submission of Laboratory Data for UST Reports). Article 12 required electronic submittal of analytical laboratory data submitted in a report to a regulatory agency (effective September 1, 2001), and surveyed locations (latitude, longitude and elevation) of groundwater monitoring wells (effective January 1, 2002) in Electronic Deliverable Format (EDF) to Geotracker. Article 12 was subsequently repealed in 2004 and replaced with Article 30 (Electronic Submittal of Information) which expanded the ESI requirements to include electronic submittal of any report or data required by a regulatory agency from a cleanup site. The expanded ESI submittal requirements for petroleum UST sites subject to the requirements of 23 CCR, Division, 3, Chapter 16, Article 11, became effective December 16, 2004. All other electronic submittals required pursuant to Chapter 30 became effective January 1, 2005. Please visit the SWRCB website for more information on these requirements. (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

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, 7835, 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, late 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 SCP)	REVISION DATE: July 25, 2012
	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 (petroleum UST and SCP) 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 .loptoxic@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 <://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 .loptoxic@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.



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August 28, 2013

**FACT SHEET ON ENVIRONMENTAL ASSESSMENT
AND PROPOSED CORRECTIVE ACTIONS**

Former Western Forge & Flange Property

540 Cleveland Avenue
Albany, California 94706
Site Cleanup Program (SCP) Case No. RO0003009
Geotracker Global ID T10000001598

Site Remediation Summary

This fact sheet has been prepared to inform community members and other interested stakeholders regarding the status of a proposed soil and groundwater cleanup at the former Western Forge & Flange property located at 540 Cleveland Avenue, Albany, California. Mr. Walter Pierce of Western Forge & Flange, the Responsible Party representative for the SCP case, is proposing excavation and off-site disposal of impacted soil to clean up the site.

Site Background

The site is located in an industrial area of Albany between the Interstate 80 and 580 Freeways. The Western Forge & Flange Company manufactured flanges on-site from 1944 until it closed the facility in 2007. The approximately 25,000 square-foot metal industrial style building which covers the majority of the site is planned to be demolished prior to site remediation.

Remediation Alternative: Soil Excavation and Removal

The remediation proposed for the site includes excavation and removal of soil and groundwater impacted with metals and hydraulic oil. Soil that exceeds cleanup goals will be disposed of off-site at an approved and regulated landfill. Groundwater may be pumped out of excavations and into temporary holding tanks before being treated onsite and discharged to sanitary sewer in accordance with applicable guidelines and under permit with EBMUD. Confirmation soil samples will be collected from excavation areas to evaluate whether the impacted soil was sufficiently removed to achieve the identified cleanup goals.

Three groundwater monitoring wells will also be installed to investigate residual contamination in groundwater after the cleanup of contaminated soil. The wells will be monitored quarterly for a minimum of approximately one year in order to determine the affects of the contamination on groundwater quality beneath the site through a full hydrologic cycle. The need for additional actions will be determined based on the results of the groundwater monitoring.

What This Means to You

During the proposed remediation there will be short-term affects to the local vicinity. These include an increase in noise due to the use of heavy equipment to excavate the contaminated soil and dewater the excavation, a potential increase in incidental dust due to the presence of the heavy equipment and excavation at the site, and an increase in truck traffic as the contaminated soil is hauled from the site to the accepting landfill. Dust control measures will be employed, including soil wetting with publicly supplied water, on-site truck speed limits, soil drop height limits, load tarping, and truck inspection and cleaning prior to departure. A traffic control plan will also be followed.

Next Step

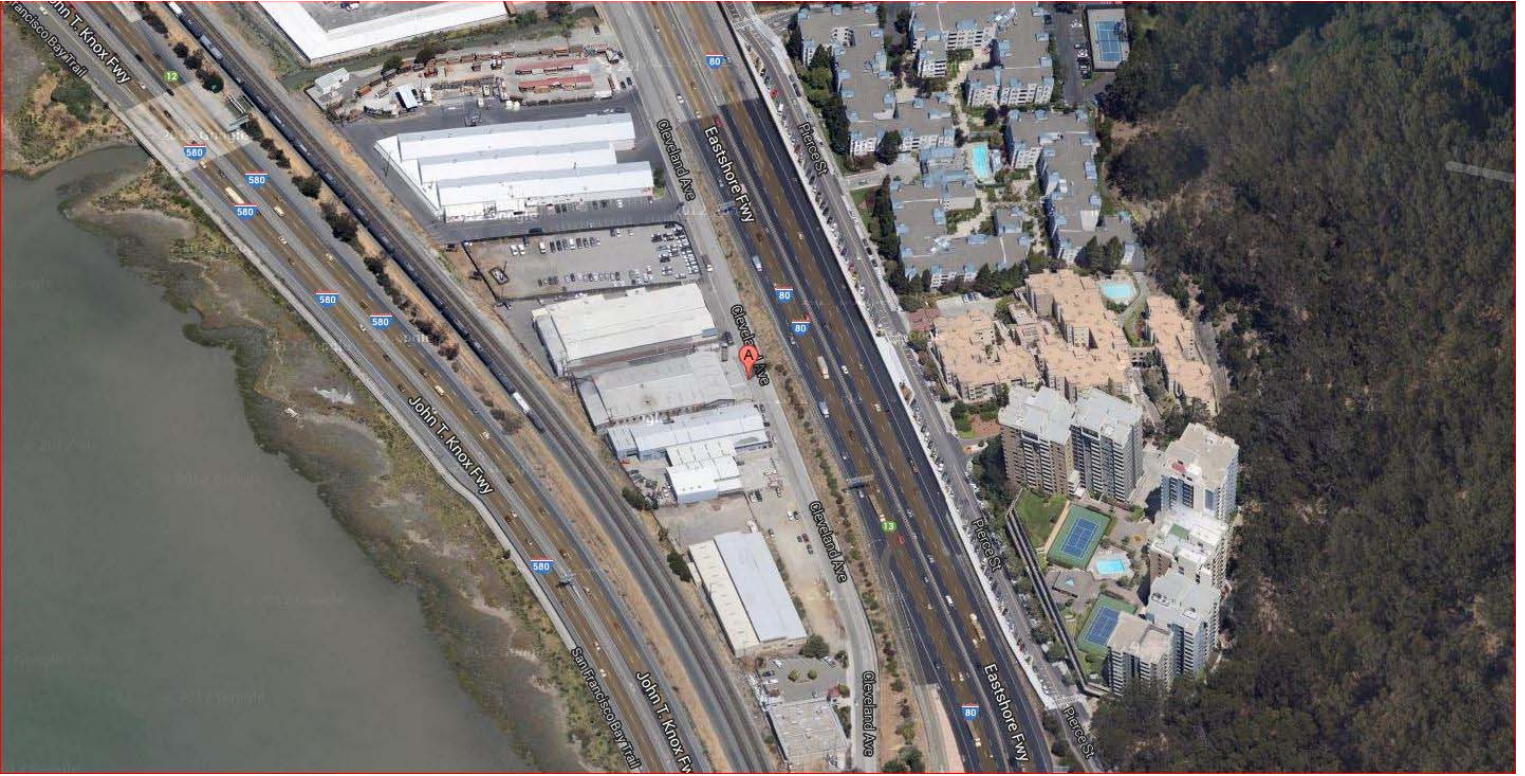
Mr. Pierce is working with Alameda County Environmental Health (ACEH) to implement soil and groundwater remediation at the site. The proposed remedial alternative is described in two documents (*Revised Data Gap Investigation Report and Corrective Action Plan* dated May 15, 2013, and the *Corrective Action Plan Addendum* dated July 22, 2013), each prepared by Ninyo & Moore on behalf of Mr. Pierce. These documents incorporated comments made and modifications requested by several ACEH directive letters (March 12 and June 28, 2013).

The public is invited to review and comment on the proposed cleanup action. The reports are available on the ACEH website (<http://www.acgov.org/aceh/index.htm>) or the State Water Resources Control Board's Geotracker website (<http://www.geotracker.waterboards.ca.gov/>). Please send written comments regarding the corrective action to Mark Detterman at the address below. **All written comments received by October 9, 2013** will be forwarded to the Responsible Party and will be considered and responded to prior to a final determination on the proposed cleanup.

For additional information, please contact:

Mark Detterman, P.G., C.E.G.
Alameda County Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502
Phone: 510-567-6876
E-mail: mark.detterman@acgov.org

Kris Larson, P.G.
Ninyo & Moore
1956 Webster Street, Suite 400
Oakland, CA 94612
Phone: (510) 343-3000
E-mail: klarson@ninyoandmoore.com



Aerial View of Property (Google Earth, 2013)

ADHESIVE PRODUCTS INC
Parcel #: 66-2760-1-9
520 CLEVELAND AVE
ALBANY CA 94710

ALBANY STEEL
Parcel #: 66-2760-14-11
536 CLEVELAND AVE
ALBANY CA 94710

BEAUDRY PETER B &
Parcel #: 66-2760-11-5
1401 GREENWOOD TER
BERKELEY CA 94708

BEAUDRY PETER B &
Parcel #: 66-2760-11-10
1401 GREENWOOD TER
BERKELEY CA 94708

DRESNICK PAUL & BLASQUEZ
Parcel #: 66-2760-13-5
196 MARTINVALE LN
SAN JOSE CA 95119

EAST BAY MUNICIPAL
Parcel #: 66-2760-1-6
375 11TH ST
OAKLAND CA 94607

IJK PROPERTIES LLC
Parcel #: 66-2760-12-4
PO BOX 29
MILLBRAE CA 94030

IJK PROPERTIES LLC
Parcel #: 66-2760-12-5
PO BOX 29
MILLBRAE CA 94030

RESIDENT
Parcel #: 66-2760-13-7
544 CLEVELAND AVE
ALBANY CA 94710

RESIDENT
Parcel #: 66-2760-11-5
650 CLEVELAND AVE
ALBANY CA 94710

RESIDENT
Parcel #: 66-2760-13-5
578 CLEVELAND AVE
ALBANY CA 94710

RESIDENT
Parcel #: 66-2760-14-8
540 CLEVELAND AVE
ALBANY CA 94710

RESIDENT
Parcel #: 66-2760-1-6
HOFFMAN BLVD
ALBANY CA 94706

RESIDENT
Parcel #: 66-2760-11-10
CLEVELAND AVE
ALBANY CA 94710

RESIDENT
Parcel #: 66-2760-12-4
600 CLEVELAND AVE
ALBANY CA 94710

RESIDENT
Parcel #: 66-2760-12-5
600 CLEVELAND AVE
ALBANY CA 94710

WESTERN FORGE & FLANGE
Parcel #: 66-2760-14-8
PO BOX 1788
CLEVELAND TX 77328

Z RENTALS LP
Parcel #: 66-2760-13-7
2503 SAN PABLO AVE #D
PINOLE CA 94564