



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
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(510) 567-6700
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August 13, 2015

John Protopapas
2868 Hannah Street LLC
155 Grand Avenue, Suite 1025
Oakland, CA 94612
(Sent via email to John@mpfcorp.com)

Subject: Conditional Work Plan Approval for Site Cleanup Program Case No. RO0003160, Precision Cast Products, 1549 32nd Street and 2868 Hannah Street, Oakland, CA 94608

Dear Mr. Protopapas:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including the recently submitted document entitled, "*Phase II Environmental Site Assessment Results, 2868-2898 Hannah Street, Oakland, California,*" dated August 10, 2015 (Report). The Report, which was prepared on your behalf by Roux Associates, presents results from soil and groundwater sampling conducted in March 2015 at five soil boring locations. Based on results from the five soil borings, the Report includes plans to advance two additional soil borings and install three groundwater monitoring wells. The Report also indicates that Roux Associates will prepare work plans for proposed soil and groundwater remediation at a later date. Results from the five soil borings and preliminary remediation plans were also discussed during a meeting on August 5, 2015 between Robin Brown of Madison Park Financial, Angela Liang Cutting and David Grunat of Roux Associates, and Jerry Wickham of ACEH.

The proposed scope of work in the Work Plan is conditionally approved and may be implemented provided that the technical comments below are incorporated during the site investigation. Submittal of a revised Work Plan is not required 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, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Vertical Extent of Contamination.** The vertical extent of contamination has not been defined for the site. Tetrachloroethene (PCE) was detected in the lowermost soil samples (20 feet bgs) collected from borings RB-1 and RB-3 at concentrations of 4,050 and 6,300 micrograms per kilogram ($\mu\text{g}/\text{kg}$), respectively. The PCE concentration of 4,050 $\mu\text{g}/\text{kg}$ detected at 20 feet bgs in RB-1 was the highest concentration of PCE measured in soil samples from RB-1. Similarly, the highest PID reading measured in boring RB-1 was at a depth of 20 feet bgs. In order to help delineate the vertical extent of PCE, we request that one additional soil boring be advanced at a location approximately 10 feet west of RB-3. The soil boring is to be extended to a depth below which PID readings approach ambient or de minimis levels. Soil sampling procedures are to be similar to those proposed in the Report for the two proposed soil borings east of RB-3. Soil samples are to be selected for laboratory analysis as requested in technical comment 2.

2. **Soil Samples for Laboratory Analysis.** The Report indicates that select soil samples will be retained for laboratory analysis. For clarification, we request that soil samples be collected continuously for logging and screening purposes. Soil samples are to be collected for laboratory analysis from any interval where visible staining, odor, or elevated PID readings are observed in the borings. If no visible staining, odor, or elevated PID readings are observed in the borings, soil samples are to be submitted for laboratory analysis at 5-foot intervals from 5 feet bgs to the bottom of the soil boring.
3. **Well Screens.** The Report indicates that the proposed monitoring wells will be screened from approximately 15 to 20 feet bgs. A review of boring logs from the soil borings RB-1 through RB-5 indicates that water levels measured in the borings ranged from 7 to 14 feet bgs. A review of nearby sites indicates that reported groundwater levels are typically in the range of approximately 5 to 12 feet bgs. We request that the tops of the well screens be installed a minimum of approximately two feet above static water levels in the monitoring well borings and the bottoms of the well screens be installed a maximum of approximately ten feet below static water levels in the monitoring well borings.
4. **Conduit Survey.** We request that you complete a conduit survey to help assess whether on-site and/or off-site preferential pathways may be present. Please include the results of the conduit survey in the Soil and Groundwater Investigation Report requested below.
5. **Well Survey.** The locations of nearby water supply wells appears to be a data gap as discussed in the report entitled, "*Initial Site Conceptual Model, 1549 32nd Street, Oakland, California,*" prepared by Applied Remedial Services, Inc. and dated February 16, 2015. We request that you complete a well survey for an area with a 2,000-foot radius around the site using Department of Water Resources and Alameda County Public Works records. Please include the results of the well survey in the Soil and Groundwater Investigation Report requested below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Jerry Wickham), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **October 20, 2015** – Soil and Groundwater Investigation Report
File to be named: SWI_R_YYYY-MM-DD RO3160

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RO0003160
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If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org. Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Attachment: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Robin Brown, Madison Park Financial (*Sent via E-mail to: robin@mpfcorp.com*)

Angela Liang Cutting, Roux Associates, 555 12th Street, Suite 1725, Oakland, CA 94607
(*Sent via E-mail to: acutting@rouxinc.com*)

David Grunat, Roux Associates, 555 12th Street, Suite 1725, Oakland, CA 94607 (*Sent via E-mail to: dgrunat@rouxinc.com*)

Jerry Wickham, ACEH (*Sent via E-mail to: jerry.wickham@acgov.org*)
GeoTracker, eFile

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.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, 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: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 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 deh.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 <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 deh.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.