



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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September 16, 2015

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

Subject: Work Plan Review for Voluntary Remedial Action 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, "*Soil Remedial Action Work Plan, 2868 Hannah Street, Oakland, California,*" dated September 3, 2015 (RAP). The RAP, which was prepared on your behalf by Roux Associates, presents plans to excavate soils containing volatile organic compounds (VOCs) in the southern portion of the site and treat the soils on site by aeration. The RAP was revised in response to ACEH comments in correspondence dated August 27, 2015.

Based on our review, the proposed scope of work in the September 3, 2015 RAP is acceptable for public notification. In order to implement the work by October 15, 2015, Roux Associates has drafted a fact sheet and requested a public comment period less than 30 days. In electronic mail dated September 15, 2015, ACEH approved the fact sheet and described the conditions under which a public comment period less than 30 days may be acceptable. Final approval of the proposed scope of work in the September 3, 2015 RAP is contingent upon successfully addressing all public comments and preparing a Revised RAP that addresses the ACEH technical comments below.

TECHNICAL COMMENTS

- 1. Aeration Monitoring.** The RAP currently proposes that air samples be collected following the placement of soils for aeration. In order to prevent possible exposure prior to air sampling, we request that excavated soils be stockpiled and covered prior to spreading for aeration. A limited volume of soils exhibiting the most evidence of contamination based on observations and screening are to be spread in a test plot for aeration. An ambient air sample is to be collected at a location downwind from the test plot. The test plot should be approximately 10 feet by 10 feet and located along Hannah Street away from any residences. The remaining stockpiled and covered soil is not to be spread for aeration until air sample results confirm that tetrachloroethene (PCE) emissions from the test plot do not exceed 6 micrograms per cubic meter (6 $\mu\text{g}/\text{m}^3$). Results of the aeration monitoring are to be provided to ACEH within 24 hours of completion of the analysis. Please include this revision in the revised RAP requested below.

2. **Air Monitoring for Excavation.** Air monitoring using a PID as proposed in the RAP is to be conducted during excavation. Immediately after completion of excavation, we request that an ambient air sample be collected at a location downwind from the stabilized excavation to confirm that PCE emissions from the excavation do not exceed $6 \mu\text{g}/\text{m}^3$. If PCE emissions from the excavation exceed $6 \mu\text{g}/\text{m}^3$, actions must be immediately taken to reduce emissions by covering or backfilling the excavation. In the Revised RAP requested below, please include contingency plans for reducing emissions from the excavation.
3. **Height of Ambient Air Sample Collection.** The ambient air samples are to be collected at a distance of no greater than 3 feet above ground surface to potentially account for children's breathing zones.
4. **Dust during Aeration.** After the soil is spread for aeration, please include an initial schedule for site visits during periods of high wind to observe whether visible dust is originating from exposed surfaces at the site. If visible dust is generated from the aerating soil, dust suppression activities are to be conducted as soon as practicable but no later than 6 hours after the observation. A sign that identifies a Designated Person who can be contacted by telephone during non-working hours for dust control and other site issues is to be posted in an easily visible location at the site.

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:

- **September 25, 2015** – Revised Soil Remedial Action Work Plan
File to be named: IRAP_R_yyyy-mm-dd RO3160

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

Attachments: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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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*)

Dilan Roe, ACEH (*Sent via E-mail to: dilan.roe@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.