

Detterman, Mark, Env. Health

From: Levi, Ariu, Env. Health
Sent: Monday, November 22, 2010 1:15 PM
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Cc: De, Sukla, Env.Health; Drogos, Donna, Env. Health; Hugo, Susan, Env. Health; Detterman, Mark, Env. Health; Nobrega, Herlander, Env. Health
Subject: Western Flange

Hello Walt.

As talked about last week, I have comments from the two parts of my office that are providing regulatory oversight to the clean-up of your site in Albany.

Above soil surface contaminant issues and closure requirements with and without a deed restriction:

- Fastest route.
 1. Demolition of the structure.
 - No further action for the structural cleanup or sampling will be required.
- Building stays in place.
 1. Property closure **with** deed restriction (meets housekeeping standards).
 - Two thirds of the structure was sampled under County oversight after last clean-up effort. 75% of those samples showed clean-up level not reached for nickel (0.200 mg/100cm²) and lead (0.0269 mg/100 cm²).
 - The areas within the building with most probable high contamination levels have not been sampled.
 - Visible probable contamination was still observed in the lower areas. Those need to be cleaned.
 - Deed restriction will require notification on the nature and level of contamination and exposure potential to any one working in the area: contractors like electrician, plumber, janitorial service etc.
 2. Property Closure **without** deed restriction
 - Further clean up will be required. Sampling will be required for cleanup verification.
 - Nickel causes contact dermatitis and is also a known carcinogen. Lead is a neurotoxin and hematopoietic toxin with ingestion, skin absorption as route of entry.
 - There are swabs available for field test for lead level of 2 ug (also available for 18 ug) and nickel level of 1 ug. These can be used to determine effectiveness of cleanup work done before expensive analytical work.
 - Aggressive cleaning like sandblasting followed with steam cleaning **probably** will be a better method of contamination removal.

Below ground contamination issues and closure with and without a deed restriction:

At the present time there are a number of known contamination hotspots at the site (hydraulic oil or metals). Upon completion of the currently proposed work (to be modified by ACEH) a better understanding of the lateral or down gradient extent of impacts in soil or groundwater will be available (but may not be complete). Additional scopes of investigation might thereafter be required to refine that understanding. I suspect, but do not know, that there may not be a lot to do; removal of free phase oil, perhaps some limited excavation in several areas (perhaps both shallow and a bit deeper, depending on pending data collection); and probably a groundwater monitoring program of some duration. Based on the results of the investigation(s) various permutations of the following generic options are likely available:

- Option One – Site Closure with no encumbrances - Remediation to residential cleanup levels (required by regulation for non-petroleum contaminants), which this currently is not, and which does not appear appropriate for this industrial site. Please note that residential in this case refers to the possibility of the property being re-used at some future time for houses, etc..
- Option Two – Site Closure with Site Management Requirements (but not deed restrictions) – All non-petroleum contaminants below residential goals, and elevated residual petroleum above those goals. Site Management Requirements can include notification of ACEH if construction or excavation activities take place that can affect contaminated media, restriction to commercial or industrial land use only, or any site redevelopment activities which can include changes to the building footprint (and etc, based on residual contaminant levels). This allows an evaluation of the effect of the future work on the contaminated media at that time.
- Option Three – Site Closure with Deed Restriction – Remediation above goals; generally limited in this case to difficult to access contaminated media with elevated concentrations (limitations imposed by building foundation stability, depth to, other physical limitations or other removal actions that generate excessive costs). Restrictions on future land use would be described in the deed restriction, and would use Standard Alameda County Deed Restriction language (a copy of which can be forwarded).

From the department's perspective, both cases are on hold since both accounts are in arrears. This department offsets cost by charging for its services. At present, the Board of Supervisors approved a budget that requires the department to provide 95% of its own funding. The contamination clean-up programs fall into this 95%. As far as the department going forward with the case there are 3 options:

1. Accounts are made whole and an active deposit is on record.
2. The accounts are not made whole and the cases are transferred to either the state EPA/DTSC or the SFRWQCB
3. The accounts are not made whole and oversight work discontinues for the time being.

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