



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

March 12, 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: Request for Draft Fact Sheet With Modified Approval of Corrective Action Plan; 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 *Data Gap Investigation Report and Corrective Action Plan*, dated January 29, 2013. The document was submitted on your behalf by Ninyo & Moore, Inc. Thank you for submitting the report.

The Corrective Action Plan (CAP) proposes to target contaminated soil (TPH as hydraulic oil and selected metals) for remedial excavation, followed by Monitored Natural Attenuation (MNA) of residual contamination in groundwater downgradient of the excavated zones. To conduct MNA, three wells are proposed to be installed at currently unspecified locations downgradient of the Ring Roller Pit excavation. Remediation is proposed using Residential Environmental Screening Levels (ESLs) established by the SF RWQCB for groundwater not anticipated to be utilized as drinking water, based on Total Dissolved Solids (TDS) and salinity concentrations in groundwater collected at the site that are marginal for drinking water use. ACEH understands this is goal has been selected in consultation between the property seller and potential purchaser, the City of Albany. While ACEH believes this may be achievable for the hydraulic oil contamination, ACEH notes that it may not be possible for the documented metal contamination, and that a commercial land use (not a deed restriction) may ultimately be required to manage these contaminants at the site in the future (including arsenic and vanadium), unless a site specific risk assessment provides documentation otherwise. The high metals concentrations may, in part, be related to fill soils used at the site.

Based on ACEH staff review of the work plan, and the submittal of a Work Plan Addendum (a revised Figure 9), the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Please note that the submittal of a work plan addendum (a revised Figure 9) is required prior to proceeding with proposed work. If an alternative scope of work outside that described in the work plan or these technical comments is proposed, a revised work plan is required. We request that you address the following technical comments, perform the proposed work, and send us the report described 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) Corrective Action Plan Modifications** – The referenced work plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests several modifications to the approach. Please submit the Work Plan Addendum (Revised Figure 9) and a report by the dates specified below.

- a. **Downgradient Groundwater Wells** – ACEH requests clarification of the placement of the three wells proposed for installation to monitor the proposed post-remediation MNA in a revised Figure 9 by the date referenced below.
 - b. **Soil Reuse Characterization Protocols** – The CAP proposes to characterize soil for potential reuse at an interval of one soil sample per 50 cubic yards. In order to meet SF RWQCB Petroleum Reuse Criteria, ACEH requests that soil for potential reuse be characterized by the protocols defined in the October 20, 2006 Draft *Characterization and Reuse of Petroleum Impacted Soil as Inert Waste*. The document defines certain reuse criteria that may preclude reuse of some soil at the site.
 - c. **Request for Area 25A Confirmation Soil Sample** – The CAP did not recommend the collection of a confirmation soil sample from this area as step-out soil bores have previously defined the lateral limits of metals contamination at the location. However, ACEH requests the collection of one bottom sample to confirm the vertical limits are defined and concentrations are removed as anticipated.
 - d. **Soil Sample Selection Protocols** – The work plan proposes to collect and retain for laboratory analysis sidewall and bottom confirmation soil samples from each defined excavation area. ACEH requests these samples be analyzed at signs of contamination (staining, odors, PID responses, etc).
 - e. **Soil and Groundwater Analytical Suite** – The proposed non-hydrocarbon (metals) analytical suite for excavation confirmation samples is very limited; only mercury and barium in Area 107. To provide documentation that all metals concentrations above remediation goals have been adequately removed, ACEH requests that all metals of concern within an excavation area be included in the excavation area analytical suite. This includes arsenic and vanadium, which are presumed to be fill soils related background concentrations. In “RRP West 2” this includes copper, molybdenum, nickel, in addition to arsenic and vanadium. Areas “B-25” and “B-24A” also require additional analysis for select metals per this request.
2. **Request for Draft Fact Sheet and List of Recipients** – A Fact Sheet describing the selected remedial alternative must be prepared and sent out to the affected stakeholders in the vicinity of the subject site. In an effort to expedite review and to move this case forward, please generate a Draft Fact Sheet, using the attached example, and submit a List of Interested Parties who will be receiving the Fact Sheet, by the date listed 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 following specified file naming convention and schedule:

- **April 12, 2013** – Draft Fact Sheet (Word document transmitted electronically for editing and review)
- **July 26, 2013** – Interim Remediation Report
File to be named: RO3009_IR_R_yyyy-mm-dd
- **August 30, 2013** – Quarterly Groundwater Monitoring Report
File to be named: RO3009_GWM_R_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. Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

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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

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

Donna Drogos, (sent via electronic mail to donna.drogos@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 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.



FACT SHEET ON ENVIRONMENTAL ASSESSMENT

UNOCAL#0843

1629 Webster Street, Alameda, CA 94501
Fuel Leak Case No. RO0000450 and
GeoTracker Global ID T0600102263

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 ARCO located at 1629 Webster St., Alameda, California. Mr. Borgh, the lead responsible party for the fuel leak case is proposing ozone/oxygen injection and potential limited soil excavation as remediation technologies to cleanup the site.

Site Background

The site is located in the Webster Street commercial area of Alameda. It was previously operated as a Unocal gasoline station but is now currently a vacant lot. Plans to redevelop the property to senior housing with first floor commercial retail have been approved by the City of Alameda and await completion of remediation at the site.

Remediation Alternative: Ozone/oxygen Injection with Potential for Excavating Source Area Soils

Ozone/oxygen injection is proposed to remediate groundwater contaminated with MTBE at the site. The MTBE plume is located beneath the site at a depth of between 20 to 30 feet below ground surface (bgs). The proposed remediation will inject ozone into the plume which then reacts with the MTBE and forms carbon dioxide and water, thus destroying the MTBE. The proposal would include injecting ozone/oxygen at six different points located throughout the site for an estimated 3 to 6 months. Typically no additional infrastructure is needed to install this system.

Soil Excavation and Removal

The remediation proposal includes an evaluation of soil in the area of the former USTs. Soil borings would be advanced and samples collected to determine the extent of residual contamination. If contamination levels warrant, the soil will be excavated and removed from the site and disposed at an appropriate landfill.

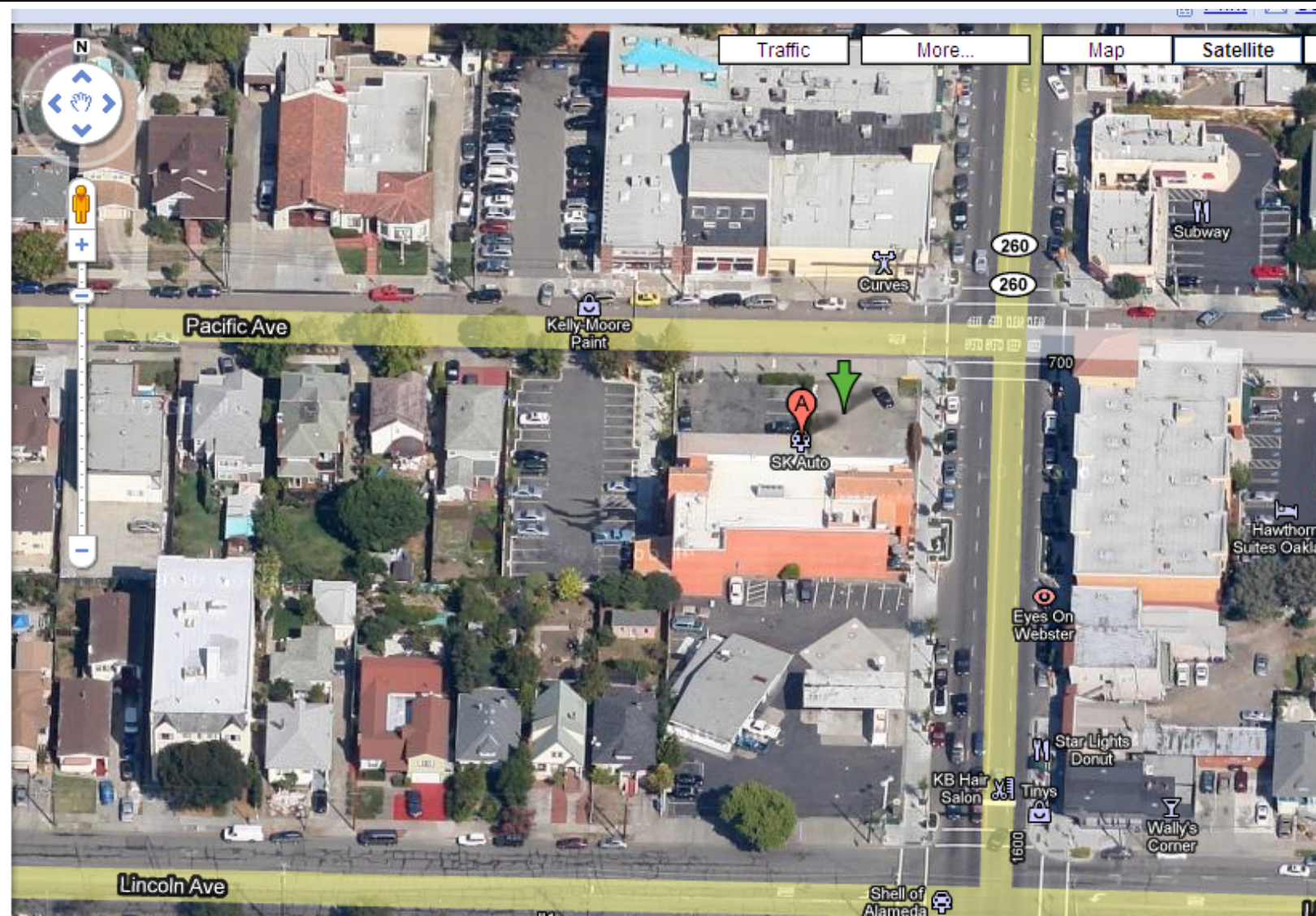
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FAX (510) 337-9335

Next Step

Mr. Borgh is working with Alameda County Environmental Health (ACEH) to implement a soil and groundwater cleanup at the site. The proposed alternative is described in the reports *Corrective Action Plan* dated April 7, 2010 and *Work Plan for Additional Assessment* dated August 24, 2010 prepared by Delta Consultants on behalf of Mr. Borgh. The public is invited to review and comment on the proposed cleanup action. The reports are available on ACEH's website (<http://www.acgov.org/aceh/lop/ust.htm>) or the State Water Resources Control Board's GeoTracker website (<http://www.geotracker.waterboards.ca.gov/>). The report and case file are also available for review at the ACEH located at 1131 Harbor Bay Parkway in Alameda, California. Please send a fax to 510-337-9335 to request a date and time to review the case file. Please send written comments regarding the corrective action to Barbara Jakub at the address below. All written comments received by **November 3, 2010** 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:

Barbara Jakub	James Barnard
Alameda County Environmental Health	Delta Environmental, Inc.
1131 Harbor Bay Parkway, Ste 250	11050 White Rock Rd., Suite 110
Alameda, CA 94502	Rancho Cordova CA 95670
Phone: 510-639-1287	Phone: 916-503-1279
E-mail: barbara.jakub@acgov.org	E-mail: jbarnard@deltaenv.com





FACT SHEET ON ENVIRONMENTAL ASSESSMENT

FORMER ARCO (INDEPENDENT)

15101 Freedom Avenue, San Leandro, CA 94578
Fuel Leak Case No. RO0000473 and
GeoTracker Global ID T0600191157

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 ARCO located 15101 Freedom Avenue, San Leandro, California. Mr. Pazdel and Mr. Khatirine, the lead responsible parties for the fuel leak case are proposing in-situ multi phase extraction (MPE) and groundwater extraction as remediation technologies to cleanup the site.

Site Background

The site is located at the foot of the San Leandro Hills, along the west side of San Leandro Valley. It is bounded on the north by Freedom Avenue, on the east by Fairmont Avenue, on the south by residential properties and on the west by 151st Avenue. It currently operates as a Texaco gasoline service station with mini-mart, and retails Texaco-branded gasoline and diesel fuel. There are three canopied product dispenser islands and three underground storage tanks (USTs) on-site consisting of one 6,000-gallon diesel UST, one 8,000-gallon gasoline UST, and one 10,000-gallon gasoline UST. Land use immediately surrounding the site is residential, with Interstate 580 located northeast of the site.

Remediation Alternative: Multi-Phase Extraction

Multi-phase extraction (MPE) is proposed to remediate the soil and groundwater at the site. MPE removes vapor phase, dissolved phase, and separate phase contaminants from the soil and groundwater. In MPE, vapor and liquid are removed from each well using a high vacuum, with the liquids stored into a holding tank. The resulting separate phases (liquid and vapor) are treated by passing through granular activated carbon (GAC) (i.e. charcoal), internal combustion engine (ICE), catalytic oxidizer (CatOx) and air stripper, or other method to further remove contamination from liquid and vapor, which is then discharged to ambient air, and/or to the sanitary or storm sewer. MPE systems typically require permanently-installed high-amperage electrical service, as well as natural gas or propane to operate.

For Additional information, please contact:

Paresh Khatri Alameda County Environmental Health 1131 Harbor Bay Parkway, Ste 250 Alameda, CA 94502 Phone: 510-777-2478 E-mail: paresh.khatri@acgov.org	Mansour Sepehr SOMA Environmental Services, Inc. 6620 Owens Drive, Suite A Pleasanton, CA 94588 Phone: 925-734-6400 E-mail: MSepehr@somaenv.com
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Groundwater Extraction and Treatment

Groundwater extraction (GWE) is proposed to remediate the off-site groundwater contaminant plume. GWE would extract contaminated groundwater from a series of extraction wells or French drain. The extracted water is treated using GAC vessels. The treated water is released to the sanitary sewer or storm drain system. This system is effective because it would prevent off-site migration of chemicals while removing most soluble components of groundwater contaminants, such as TBA and MTBE, from groundwater.

Next Step

Mr. Pazdel and Mr. Khatirine are working with Alameda County Environmental Health (ACEH) to implement a soil and groundwater cleanup at the site. The proposed alternative is described in a report prepared by SOMA Environmental Services, Inc. on behalf of Mr. Pazdel and Mr. Khatirine: "Revised Work Plan for Implementing Corrective Action Plan," dated February 10, 2009. The public is invited to review and comment on the cleanup action proposed in the Report. The report is available on ACEH's website (<http://www.acgov.org/aceh/lop/ust.htm>) or the State Water Resources Control Board's GeoTracker website (<http://www.geotracker.waterboards.ca.gov/>). The report and case file are also available for review at the ACEH located at 1131 Harbor Bay Parkway in Alameda, California. Please send a fax to 510-337-9335 to request a date and time to review the case file. Please send written comments regarding the corrective action to Paresh Khatri at the address below. All written comments received by **April 15, 2009** will be forwarded to the Responsible Party and will be considered and responded to prior to a final determination on the proposed cleanup.

