ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
ALEX BRISCOE, Agency Director

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

June 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: Request for Revised Draft Corrective Action Plan; 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 Draft Public Comment Fact Sheet, dated April 26, 2013, and the *Revised Data Gap Investigation Report and Corrective Action Plan,* dated May 15, 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 encountered 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 in the assumption that natural attenuation will reduce TPHho and metals concentrations sufficiently to allow case closure.

ACEH is in general agreement with the proposed approach to corrective actions, and is in agreement that excavation is an appropriate action at the site. However, as you are aware, the Regional Water Quality Control Board's (RWQCBs) Environmental Screening Levels (ESLs) have recently undergone revision two times since the beginning of the year. The *Revised Data Gap Investigation Report and Corrective Action Plan* was written to accommodate changes to metal ESLs which are being used as corrective action cleanup goals. The corrective action plan (CAP) portion was written with the understanding that cobalt was a contaminant of concern. With the second revision, cobalt no longer is a contaminant of concern; however, arsenic now is, due to a significant lowering of the ESL value. These changes will directly affect the extent of corrective action excavation at the site, affecting the removal volume, potentially the approach, and presumably the cost. For these reasons, ACEH requests an addendum to the CAP portion of the referenced document.

TECHNICAL COMMENTS

1. **CAP Addendum –** The referenced report and CAP proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests several modifications to the approach. Please incorporate these into a corrective action addendum by the date specified below.

    a. **Cleanup Goals for Cobalt and Arsenic –** Based on a very low ESL contained in the February 2013 revision to the RWQCB ESL document, the cleanup goal for cobalt was proposed to be 20 milligrams per kilogram (mg/kg) based on a statistical analysis of cobalt concentrations using the DTSC guidance document entitled *Arsenic Strategies,*

Determination of Arsenic Remediation, Development of Arsenic Cleanup Goals, but applied to cobalt. However, in the May 2013 ESL revision the cobalt ESL reverted to an ESL higher than detected at the subject site. As a consequence it appears appropriate for the revised commercial cobalt ESL to be defined as the cleanup goal for the site. As noted above, this will affect the extent of soil excavation previously associated with cobalt concentrations; these changes need to be incorporated into a revised CAP (CAP Addendum), by the date identified below.

Conversely, the arsenic ESL in the May 2013 ESL revision decreased significantly. Justification for a higher arsenic cleanup goal has been the subject of recent discussions; however, a redefined cleanup goal has not yet been determined. Please incorporate justification of a revised cleanup goal for arsenic for the subject site in the CAP Addendum, by the date identified below.

Please note that this is necessarily a human and environmental health risk evaluation. The RWQCB ESL document states that the values in the ESL tables are considered to be Tier 1 risk assessment values, and if changes are proposed, the proposed values require additional risk evaluation, becoming a Tier 2 process. Please be aware that the presence of a chemical at concentrations above the ESL does not necessarily indicate that adverse impacts to human health or the environment are occurring, just that the potential for adverse risk can exist and that additional evaluation is warranted. Thus this becomes a risk evaluation, rather than a background evaluation, and may ultimately become a cost / benefit analysis of performing a more site-specific risk assessment vs. utilizing standard ESLs for the contaminant.

b. Excavation Confirmation Soil Sampling – The CAP proposes the collection of one soil sample for every 25 linear feet of excavation sidewall and one centered bottom sample per excavation up to 2,500 square feet. ACEH requests sufficient additional bottom samples be collected to observe a bottom sampling interval of one soil sample per every 250 square feet. Because each corrective action excavation has multiple depths with soil contamination above the Clean-Up Goals (the recently revised RWQCB commercial ESLs for non-drinking water) ACEH additionally requests that each sidewall be characterized by soil sampling in each excavation at the depth of previously documented soil contamination. Finally, ACEH requests the samples be biased positively towards visible, odiferous, or otherwise noticeable contamination.

c. Excavation Sidewall Sampling – ACEH noted a number of proposed excavations that lacked a minimum of four sidewall soil samples that characterized the excavations around their entire perimeters. ACEH requests that sufficient samples be collected to do so (e.g. EX1, EX2, EX4, EX5, EX10, and etc.).

d. Excavation EX8 – ACEH notes that excavation EX8 is proposed to extend to a depth of approximately 2 feet bgs. Because of the location of the excavation proximal to the Ring Roller Pit and LNAPL at that location, additional depth may be required, similar to proposed excavation EX7. This is additionally suggested be the soil sample collected at a depth of 5 feet bgs in bore SB-14A. ACEH recognizes the contaminant concentration is below the commercial ESL in this soil sample, the smear zone, similar to EX7, may contain additional areas over the commercial ESL cleanup goal.

e. Stockpile Management – ACEH noted descriptions of dust management and traffic control management, but did into find stockpile management procedures at a site where dust control will be of importance. Please incorporate appropriate stockpile management in the CAP Addendum.

f. Soil and Groundwater Analytical Suite – ACEH is in general agreement with the proposed analytical suite; however, requests additional analysis for Poly Aromatic Hydrocarbons (PAHs) in soil and groundwater samples. The analysis of PAHs in soil is requested to be positively biased towards elevated residual TPHho contamination that has been presumed to be below RWQCB ESL Cleanup Goals. This is intended to address the potential use of the

Low-Threat Closure Policy (LTCP) for petroleum hydrocarbon contamination at the site, and / or to document that these chemicals are (presumably) below ESLs.

g. **Groundwater Monitoring Well Installation Locations –** ACEH is in general agreement with the locations of wells MW-1 and MW-3; however, a significant gap in the well network is present between wells MW-3 and MW-2. As a consequence ACEH requests modification of the position of well MW-2 to eliminate the well network gap in this area. Please document the proposed revised location of the well with the CAP addendum by the date listed below.

2. **Potential Soil Reuse and Clean Import Fill –** ACEH is in general agreement that some of the excavated soil may be suitable for reuse. Backfill operations will use the RWQCB's October 20, 2006 Draft *Characterization and Reuse of Petroleum Impacted Soil as Inert Waste*. ACEH requests that all soil that is considered or reclassified for potential reuse be characterized by the sampling protocol described for potentially clean overburden soil.

   In regards to documenting the quality of clean import fill, ACEH requests that the excavations be backfilled using material with characteristics similar to the surrounding native formation or flowable fill material in order to minimize "mounding" effects on groundwater flow direction. Fill material must be certified as "clean" in accordance with the California Environmental Protection Agency Department of Toxic Substances Control (DTSC) *Clean Imported Fill Material Information Advisory* (Attachment A) in order to minimize the potential of introducing contaminated fill material onto the site and protect future site occupants. An imported fill material plan prepared in accordance with the DTSC Advisory and fill documentation must be submitted to ACEH for review and approval prior to importing and backfilling the excavations. Clean fill documentation must be submitted with the Corrective Excavation Report.

3. **Landowner Notification** - 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:

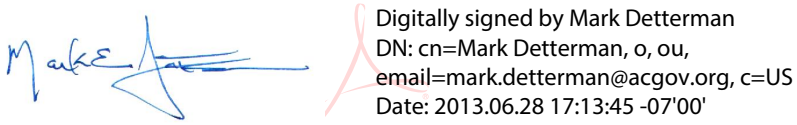
- **July 19, 2013 -** Landowner Notification Form
  File to be named: RO3009_CORRES_L_yyyy-mm-dd

- **August 12, 2013** – CAP Addendum
  File to be named RO30009_CAP_ADDEND_L_yyy-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 A – DTSC *Clean Imported Fill Material Information Advisory*
Attachment B – *List of Landowners Form*

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)
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
& ACEH Electronic Report Upload (ftp) Instructions

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.

ATTACHMENT A

Department of Toxic Substance Control

Clean Imported Fill Material Information Advisory

Information Advisory
Clean Imported Fill Material

October 2001

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

It is DTSC's mission to restore, protect and enhance the environment, to ensure public health, environmental quality and economic vitality, by regulating hazardous waste, conducting and overseeing cleanups, and developing and promoting pollution prevention.

State of California

California Environmental Protection Agency

Executive Summary

This fact sheet has been prepared to ensure that inappropriate fill material is not introduced onto sensitive land use properties under the oversight of the DTSC or applicable regulatory authorities. Sensitive land use properties include those that contain facilities such as hospitals, homes, day care centers, and schools. This document only focuses on human health concerns and ecological issues are not addressed. It identifies those types of land use activities that may be appropriate when determining whether a site may be used as a fill material source area. It also provides guidelines for the appropriate types of analyses that should be performed relative to the former land use, and for the number of samples that should be collected and analyzed based on the estimated volume of fill material that will need to be used. The information provided in this fact sheet is not regulatory in nature, rather is to be used as a guide, and in most situations the final decision as to the acceptability of fill material for a sensitive land use property is made on a case-by-case basis by the appropriate regulatory agency.

Introduction

The use of imported fill material has recently come under scrutiny because of the instances where contaminated soil has been brought onto an otherwise clean site. However, there are currently no established standards in the statutes or regulations that address environmental requirements for imported fill material. Therefore, the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) has prepared this fact sheet to identify procedures that can be used to minimize the possibility of introducing contaminated soil onto a site that requires imported fill material. Such sites include those that are undergoing site remediation, corrective action, and closure activities overseen by DTSC or the appropriate regulatory agency. These procedures may also apply to construction projects that will result in sensitive land uses. The intent of this fact sheet is to protect people who live on or otherwise use a sensitive land use property. By using this fact sheet as a guide, the reader will minimize the chance of introducing fill material that may result in potential risk to human health or the environment at some future time.

Overview

Both natural and manmade fill materials are used for a variety of purposes. Fill material properties are commonly controlled to meet the necessary site specific engineering specifications. Because most sites requiring fill material are located in or near urban areas, the fill materials are often obtained from construction projects that generate an excess of soil, and from demolition debris (asphalt, broken concrete, etc.). However, materials from those types of sites may or may not be appropriate, depending on the proposed use of the fill, and the quality of the assessment and/or mitigation measures, if necessary. Therefore, unless material from construction projects can be demonstrated to be free of contamination and/or appropriate for the proposed use, the use of that material as fill should be avoided.

Selecting Fill Material

In general, the fill source area should be located in nonindustrial areas, and not from sites undergoing an environmental cleanup. Nonindustrial sites include those that were previously undeveloped, or used solely for residential or agricultural purposes. If the source is from an agricultural area, care should be taken to insure that the fill does not include former agricultural waste process byproducts such as manure or other decomposed organic material. Undesirable sources of fill material include industrial and/or commercial sites where hazardous ma-

Potential Contaminants Based on the Fill Source Area

Fill Source:	Target Compounds
Land near to an existing freeway	Lead (EPA methods 6010B or 7471A), PAHs (EPA method 8310)
Land near a mining area or rock quarry	Heavy Metals (EPA methods 6010B and 7471A), asbestos (polarized light microscopy), pH
Agricultural land	Pesticides (Organochlorine Pesticides: EPA method 8081A or 8080A; Organophosphorus Pesticides: EPA method 8141A; Chlorinated Herbicides: EPA method 8151A), heavy metals (EPA methods 6010B and 7471A)
Residential/acceptable commercial land	VOCs (EPA method 8021 or 8260B, as appropriate and combined with collection by EPA Method 5035), semi-VOCs (EPA method 8270C), TPH (modified EPA method 8015), PCBs (EPA method 8082 or 8080A), heavy metals including lead (EPA methods 6010B and 7471A), asbestos (OSHA Method ID-191)

**The recommended analyses should be performed in accordance with USEPA SW-846 methods (1996). Other possible analyses include Hexavalent Chromium: EPA method 7199*

Recommended Fill Material Sampling Schedule

Area of Individual Borrow Area	Sampling Requirements
2 acres or less	Minimum of 4 samples
2 to 4 acres	Minimum of 1 sample every 1/2 acre
4 to 10 acres	Minimum of 8 samples
Greater than 10 acres	Minimum of 8 locations with 4 subsamples per location
Volume of Borrow Area Stockpile	**Samples per Volume**
Up to 1,000 cubic yards	1 sample per 250 cubic yards
1,000 to 5,000 cubic yards	4 samples for first 1000 cubic yards +1 sample per each additional 500 cubic yards
Greater than 5,000 cubic yards	12 samples for first 5,000 cubic yards + 1 sample per each additional 1,000 cubic yards

terials were used, handled or stored as part of the business operations, or unpaved parking areas where petroleum hydrocarbons could have been spilled or leaked into the soil. Undesirable commercial sites include former gasoline service stations, retail strip malls that contained dry cleaners or photographic processing facilities, paint stores, auto repair and/or painting facilities. Undesirable industrial facilities include metal processing shops, manufacturing facilities, aerospace facilities, oil refineries, waste treatment plants, etc. Alternatives to using fill from construction sites include the use of fill material obtained from a commercial supplier of fill material or from soil pits in rural or suburban areas. However, care should be taken to ensure that those materials are also uncontaminated.

Documentation and Analysis

In order to minimize the potential of introducing contaminated fill material onto a site, it is necessary to verify through documentation that the fill source is appropriate and/or to have the fill material analyzed for potential contaminants based on the location and history of the source area. Fill documentation should include detailed information on the previous use of the land from where the fill is taken, whether an environmental site assessment was performed and its findings, and the results of any testing performed. It is recommended that any such documentation should be signed by an appropriately licensed (CA-registered) individual. If such documentation is not available or is inadequate, samples of the fill material should be chemically analyzed. Analysis of the fill material should be based on the source of the fill and knowledge of the prior land use.

Detectable amounts of compounds of concern within the fill material should be evaluated for risk in accordance with the DTSC Preliminary Endangerment Assessment (PEA) Guidance Manual. If

metal analyses are performed, only those metals (CAM 17 / Title 22) to which risk levels have been assigned need to be evaluated. At present, the DTSC is working to establish California Screening Levels (CSL) to determine whether some compounds of concern pose a risk. Until such time as these CSL values are established, DTSC recommends that the DTSC PEA Guidance Manual or an equivalent process be referenced. This guidance may include the Regional Water Quality Control Board's (RWQCB) guidelines for reuse of non-hazardous petroleum hydrocarbon contaminated soil as applied to Total Petroleum Hydrocarbons (TPH) only. The RWQCB guidelines should not be used for volatile organic compounds (VOCs) or semi-volatile organic compounds (SVOCS). In addition, a standard laboratory data package, including a summary of the QA/QC (Quality Assurance/Quality Control) sample results should also accompany all analytical reports.

When possible, representative samples should be collected at the borrow area while the potential fill material is still in place, and analyzed prior to removal from the borrow area. In addition to performing the appropriate analyses of the fill material, an appropriate number of samples should also be determined based on the approximate volume or area of soil to be used as fill material. The table above can be used as a guide to determine the number of samples needed to adequately characterize the fill material when sampled at the borrow site.

Alternative Sampling

A Phase I or PEA may be conducted prior to sampling to determine whether the borrow area may have been impacted by previous activities on the property. After the property has been evaluated, any sampling that may be required can be determined during a meeting with DTSC or appropriate regulatory agency. However, if it is not possible to analyze the fill material at the borrow area or determine that it is appropriate for use via a Phase I or PEA, it is recommended that one (1) sample per truckload be collected and analyzed for all compounds of concern to ensure that the imported soil is uncontaminated and acceptable. (See chart on Potential Contaminants Based on the Fill Source Area for appropriate analyses). This sampling frequency may be modified upon consultation with the DTSC or appropriate regulatory agency if all of the fill material is derived from a common borrow area. However, fill material that is not characterized at the borrow area will need to be stockpiled either on or off-site until the analyses have been completed. In addition, should contaminants exceeding acceptance criteria be identified in the stockpiled fill material, that material will be deemed unacceptable and new fill material will need to be obtained, sampled and analyzed. Therefore, the DTSC recommends that all sampling and analyses should be completed prior to delivery to the site to ensure the soil is free of contamination, and to eliminate unnecessary transportation charges for unacceptable fill material.

Composite sampling for fill material characterization may or may not be appropriate, depending on quality and homogeneity of source/borrow area, and compounds of concern. Compositing samples for volatile and semivolatile constituents is not acceptable. Composite sampling for heavy metals, pesticides, herbicides or PAH's from unanalyzed stockpiled soil is also unacceptable, unless it is stockpiled at the borrow area and originates from the same source area. In addition, if samples are composited, they should be from the same soil layer, and not from different soil layers.

When very large volumes of fill material are anticipated, or when larger areas are being considered as borrow areas, the DTSC recommends that a Phase I or PEA be conducted on the area to ensure that the borrow area has not been impacted by previous activities on the property. After the property has been evaluated, any sampling that may be required can be determined during a meeting with the DTSC.

For further information, call Richard Coffman, Ph.D., R.G., at (818) 551-2175.

ATTACHMENT B

Landowner Notification Form

LIST OF LANDOWNERS FORM

County of Alameda
Environmental Health Services
Environmental Protection
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR:

Site Name: Western Forge and Flange

Address: 540 Cleveland Avenue

City, State, Zip: Albany, CA 94706

Record ID #: RO0003009

Please fill out item 1 if there are multiple site landowners (attach an extra sheet if necessary). If you are the sole site landowner, skip item 1 and fill out item 2.

1. In accordance with Section 25297.15(a) of Chapter 6.7 of the California Health & Safety Code, I, _____ (name of primary responsible party), certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site:

   Name: _____

   Address: _____

   City, State, Zip: _____

   E-mail Address: _____

   Name: _____

   Address: _____

   City, State, Zip: _____

   E-mail Address: _____

   Name: _____

   Address: _____

   Name: _____

   Address: _____

2. In accordance with Section 25297.15(a) of Chapter 6.7 of the California Health & Safety Code, I _____, certify that I am the sole landowner for the above site.

   Sincerely,

_____	_____	_____	_____
Signature of Primary Responsible Party	Printed Name	Date	E-mail Address