



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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January 16, 2015

Mr. John Murray  
John Murray Productions  
1196 32<sup>nd</sup> Street, Oakland, CA 94608  
(Sent via email to [johnm@johnmurray.com](mailto:johnm@johnmurray.com))

Mr. Reid Settlemier  
RWW Properties LLC  
6114 LaSalle Avenue, #535  
Oakland, CA 94611  
(Sent via email to [reid@rww-llc.com](mailto:reid@rww-llc.com))

Subject: Interim Remedial Action Plan Request; Site Cleanup Program (SCP) Case No. RO0003142, Adeline Foundry, 3037-3115 Adeline Street, Oakland, CA 94608

Dear Mr. Murray and Mr. Settlemier:

Alameda County Environmental Health (ACEH) has reviewed the case file including the *Additional Limited Soil Investigation*, dated December 23, 2014. The report was prepared and submitted on your behalf by ERAS Environmental Inc. (ERAS). Thank you for submitting the report. Thank you also for claiming the site on Geotracker and uploading previous reports.

The referenced report documents the installation of an additional soil bore (B-2) in the vicinity of previous soil bore B-2 to collect additional shallow (2.5 feet) soil for additional analytical characterization in vicinity of the former furnace. The sample results detected concentrations of Total Petroleum hydrocarbons as diesel (TPHd), TPH as oil (TPHo), low concentrations of several dioxins and dibenzofurans, and one semi-volatile organic compound (SVOC), 2-methylnaphthalene. Poly-chlorinated biphenyl's (PCBs) were not detected at the standard laboratory reporting limits. TPHd was detected at a concentration of 3,500 milligrams per kilogram (mg/kg), TPHo at 2,200 mg/kg, and 2-methylnaphthalene at 31 mg/kg. Each of these is over their respective Environmental Screening Level (ESL) determined by the San Francisco Regional Water Quality Control Board (RWQCB).

Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below.

### **TECHNICAL COMMENTS**

**1. Interim Remedial Action Plan Request** – As previously discussed in the November 25, 2014 directive letter, prior to the recent site investigation there appeared to be limited volatile organic compounds beneath the site, and it appeared appropriate to manage residual contamination with a site management plan (SMP) and a deed restriction. Additionally, because it was considered unlikely that the full extent of contamination could be successfully removed due to the presence of the southern onsite building that appears to have been subsequently constructed over a portion of the contamination, the SMP and deed restriction appeared appropriate by their selves. However, with the detection of 2-methylnaphthalene at 31 mg/kg, in shallow soil that does not represents the highest documented concentration of TPH in soil at the site, it does not appear appropriate to manage the site with an SMP only. ACEH notes that 2-methylnaphthalene has a relatively low RWQCB ESL, based on leaching, relative to naphthalene, and appears to be a driver for additional actions at the site.

Consequently, ACEH requests the submittal of an Interim Remedial Action Plan (IRAP) by the date identified below. Please include the following items in the IRAP:

- Identification of the proposed cleanup goals,
- The basis for the goals,

- A detailed description of the proposed remediation, including confirmation sampling, dust control measures, and
  - A schedule for implementation.
- 2. Site Management Plan and Deed Restriction** – As noted above it is unlikely that the full extent of contamination can be successfully removed due to the subsequent construction of the southern onsite building over a portion of the contamination. Consequently, ACEH additionally requests the submittal of a draft SMP and draft deed restriction (using the model draft deed restriction language previously forwarded) by the date identified below.

As previously discussed, the intent of a SMP is to define health and safety protocols for future subsurface work, and includes procedures for the characterization and management of contaminated soil and groundwater when subsurface intrusion is necessary, such as for utility repair, building expansion, or site redevelopment. A deed restriction is required for all Site Cleanup Program (SCP) cases to document the presence of contamination for future landowners. The SMP should also define contaminated areas, should additional characterization be required at a future date.

- 3. Well Survey** – In order to evaluate the potential that leaching of site contaminants to groundwater could impact groundwater use in the general vicinity of the site ACEH requests that a well survey, using both Alameda County Public Works Agency (ACPWA) and Department of Water Resources (DWR) databases, be conducted within a 1,500 foot radius. ACEH requests the identification (numbered or lettered on a figure and tabulated by the system of identification) of all active, inactive, standby, decommissioned (sealed with concrete), unrecorded, and abandoned (improperly decommissioned or lost) wells including irrigation, water supply, industrial, and cathodic protection. Please note that well construction details are confidential; however, addresses and locations are not. Please submit the results of the well survey with the IRAP requested 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 Attachment 1 and the specified file naming convention below, according to the following schedule:

- **March 16, 2015** – Interim Remedial Action Plan  
File to be named: RO3142\_IRAP\_R\_yyyy-mm-dd
- **60 Days After IRAP Approval** – Interim Remediation Results  
File to be named: RO3142\_IR\_R\_yyyy-mm-dd
- **30 Days After Interim Remediation Results Submittal** – Draft SMP and Deed Restriction  
Submittal by email

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address does not appear on the cover page of this notification, ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org).

Sincerely,

Mark E. Detterman, P.G., C.E.G.  
Senior Hazardous Materials Specialist

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Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations  
Electronic Report Upload (ftp) Instructions

cc: Clinton Stockton, John Murray Productions, Inc, 1196 32<sup>nd</sup> Street, Oakland, CA 94608; (Sent via E-mail to: [Clinton@johnmurray.com](mailto:Clinton@johnmurray.com))

David Siegel, ERAS Environmental, Inc., 1533 B Street, Hayward, CA 94541 (Sent via E-mail to: [dave@eras.biz](mailto:dave@eras.biz))

Curtis Payton, ERAS Environmental, Inc., 1533 B Street, Hayward, CA 94541 (Sent via E-mail to: [curtis@eras.biz](mailto:curtis@eras.biz))

Andrew Savage, ERAS Environmental, Inc., 1533 B Street, Hayward, CA 94541 (Sent via E-mail to: [andrew@eras.biz](mailto:andrew@eras.biz))

Dilan Roe (sent via electronic mail to [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))

Mark Detterman, ACEH, (sent via electronic mail to [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))

Geotracker, Electronic File