



ALAMEDA COUNTY  
**HEALTH CARE SERVICES AGENCY**  
 DEPARTMENT OF ENVIRONMENTAL HEALTH  
 1131 Harbor Bay Parkway, Suite 250  
 Alameda, CA 94502-6577

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ALAMEDA COUNTY  
**HEALTH CARE SERVICES**  
AGENCY  
ALEX BRISCOE, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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December 15, 2015

MCG Investments LLC  
c/o Mr. Walter Merkle  
123 Estudillo Avenue  
San Leandro, CA 94577

Shirley J Davini & Dorothy D McGuire  
123 Estudillo Avenue  
San Leandro, CA 94577

Mr. David Davini  
Loretta A McGrath Family Trust  
Address Unknown

Subject: Conditional Work Plan Approval; Fuel Leak Case No. RO0000063; (Global ID # T0600102099); McGrath Steel Company, 6655 Hollis Street, Emeryville, CA 94608

Dear Ladies and Gentlemen:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including the *First Semiannual 2015 Groundwater Monitoring Report*, dated May 15, 2015 (received September 24, 2015), and the *Data Gap Investigation Workplan*, dated October 30, 2015. Both reports were prepared and submitted on your behalf by AllWest Environmental, Inc. (AllWest). Thank you for submitting the reports. Both reports were submitted as the result of a meeting that occurred on August 7, 2015 in the offices of your attorney, Mr. Jon Wactor.

The work plan proposed the installation of one soil bore (SB-26) to a depth of 25 to 30 feet below grade surface (bgs), the installation of six temporary soil vapor probes along the northern and western edges of the property to approximately 5 feet bgs, and the concurrent construction of five semi-permanent sub-slab vapor points or vapor pins along the same property margins.

Based on ACEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. 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](mailto:mark.detterman@acgov.org)) prior to the start of field activities.

#### **TECHNICAL COMMENTS**

1. **Work Plan Modifications** – The referenced work plan proposes a series of actions with which ACEH is in general agreement; however, ACEH requests several modifications to the approach. Please submit a report by the date identified below.
  - a. **Soil Selection Protocols** – The work plan proposes to collect three soil samples in soil bore SB-26 at predetermined depth intervals. To eliminate miscommunication ACEH requires that soil samples be collected and submitted for analysis, at signs of contamination (odor, discoloration, PID responses, etc.), at significant changes in lithology, and just above groundwater. Additionally to conform to the Low Threat Closure Policy (LTCP), soil samples are required in the 0 to 5 and the 5 to 10 foot depth intervals; however, please be aware that delineating the vertical extent of soil contamination additionally remains a standard requirement.
  - b. **Groundwater Collection From SB-26** – Soil bore SB-26 has been proposed to be installed to an approximate depth of 25 to 30 feet bgs for the purpose of the collection of groundwater. Depth to water appears to be highly variable at the site and vicinity. It is therefore important to allow sufficient time for groundwater at shallower depths to appear within the proposed borehole prior to extending the bore to 25 to 30 feet bgs in order to obtain an additional groundwater sample.