

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT  
9-15-06

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

September 14, 2006

Mr. Mike Olvera  
AB&I Foundry  
7825 San Leandro Street  
Oakland, CA 94621-2598

Subject: Fuel Leak Case No. RO0000092, American Brass & Iron Foundry, 7825 San Leandro Street, Oakland, CA

Dear Mr. Olvera:

I am the caseworker assigned to your case. Please send future correspondence regarding this case to my attention. Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site. The most recent document submitted for the site is a response to comments and request for site closure in correspondence from AB&I Foundry dated November 21, 2001. ACEH responded to the November 21, 2001 correspondence in an electronic mail message that outlined technical observations on the responses presented. No more recent reports or correspondence are contained in our files. The fuel leak case for this site remains open.

The purpose of this correspondence is to provide a more formal response to the November 21, 2001 request for site closure and to request additional work at the site in order to allow the case to proceed towards closure. Based on the issues discussed in the technical comments below, the case cannot be closed at this time. This decision is subject to appeal to the State Water Resources Control Board (SWRCB), pursuant to Section 25299.39(b) of the Health and Safety Code (Thompson-Richter Underground Storage Tank Reform Act - Senate Bill 562). Please contact the SWRCB Underground Storage Tank Program at (916) 341-5851 for information regarding the appeal process.

We request that you submit a Work Plan by **November 30, 2006** to address the technical comments below.

**TECHNICAL COMMENTS**

- 1. Extent of Soil and Groundwater Contamination for Former 550-gallon Gasoline UST.**  
The extent of soil and groundwater contamination has not been fully defined in the area of the former 550-gallon gasoline UST. The tank removal report for the 550-gallon UST (Levine Fricke January 31, 1992) indicated that contaminated soils were left in place on the south and west walls of the excavation and below the former UST because the excavation could not be extended further due to the presence of nearby structures. In addition, no soil samples were collected or excavation performed in the area of the former gasoline dispenser. Please present plans in the Work Plan requested below to define the lateral and vertical extent of petroleum hydrocarbons in this area.

2. **Extent of Soil and Groundwater Contamination for Former 1,1,1-Trichloroethane UST.** The extent of soil and groundwater contamination has not been fully defined in the area of the former 1,1,1-TCA UST. The tank removal report for the 1,1,1-TCA UST (AB&I April 4, 1992) indicated that contaminated soils were left in place due to the difficulty in removing a concrete surface structure. Odor, sheen, and discolored soils were observed in the MW-2 soil boring, which is adjacent to the former 1,1,1-TCA UST from 10.5 to 12 feet bgs. Please present plans in the Work Plan requested below to define the lateral and vertical extent of contamination in this area.
3. **Elevated Concentrations of Lead Detected in Groundwater.** Lead was detected in groundwater during two sampling events for well MW-4 at concentrations up to 86 micrograms per liter ( $\mu\text{g/L}$ ). The applicable aquatic habitat water quality goal for lead in groundwater is 2.5  $\mu\text{g/L}$ . Please present plans in the Work Plan requested below to evaluate these detections of elevated concentrations of lead.
4. **Sampling Monitoring Wells.** The most recent groundwater sampling data in our files are from April 1996. Please present plans in the Work Plan requested below to sample the existing groundwater monitoring wells at the site. Please note that laboratory analyses for fuel oxygenates and lead scavengers is required; however, no analyses for these constituents appear to have been conducted to date.
5. **Hydraulic Gradient.** The regional hydraulic gradient in the area of the site is to the southwest, towards San Francisco Bay. In the Work Plan requested below, please discuss potential reasons that the observed hydraulic gradient based on the four monitoring wells at the site has frequently been to northeast or northwest.

#### **TECHNICAL REPORT REQUEST**

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **November 30, 2006** – Work Plan

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.

#### **ELECTRONIC SUBMITTAL OF REPORTS**

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) 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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please be sure that you have claimed your site on the SWRCB Geotracker website (Global ID T0600100065). Visit the SWRCB website for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

#### 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, 6835, 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, later 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.

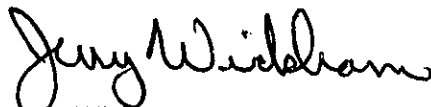
Mr. Mike Olvera  
September 14, 2006  
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**AGENCY OVERSIGHT**

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.

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham  
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Sunil Ramdass  
SWRCB Cleanup Fund  
1001 I Street, 17<sup>th</sup> Floor  
Sacramento, CA 95814-2828

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

RO#92

August 7, 1997  
StID # 523

Mr. Dave Robinson  
AB&I  
7825 San Leandro St.  
Oakland CA 94621

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

**Re: Request for Technical Information for the Closure of Former  
Underground Tanks at AB&I, 7825 San Leandro St., Oakland  
94621**

Dear Mr. Robinson:

In response to your request for site closure, our office has been reviewing the historical data in our files in regards to the removal of the four underground tanks at the above site. A number of questions arose from my review which will need further clarification. At this point, you should suspend any further groundwater monitoring unless it is required as essential information for recommendation for site closure.

Please provide a written response to each of the following items so I may proceed with site closure preparation. I will separate my questions/comments as they relate to each underground tank removal.

1. 8000 gallon unleaded gasoline tank, removed 8/8/91

\* The October 15, 1991 Levine Fricke report says that the residual gasoline in this tank was removed from the site by Evergreen Vacuum Services of Newark. Please provide a copy of the receipt for the disposal of this residual product.

2. 550 gallon unleaded gasoline tank, removed 8/26/91

\* The residual gasoline from this tank was removed by Evergreen Vacuum Services on August 23, 1991. Please provide a copy of the receipt for the disposal of this product.

\* Please provide a copy of the manifest for the disposal of this tank.

\* The monitoring well next to this former tank, MW-4, detected elevated TPHg (2100ppm) and BTEX (6.6,4.1,7.0 and 17 ppm) in the boring from 14.5'. It, therefore, appears that the extent of soil contamination has not been adequately defined as required by the RWQCB's letter regarding "low risk" soil and groundwater cases. How can residual risk via ASTM RBCA be evaluated without adequate soil characterization?

Mr. Dave Robinson  
StID # 523, AB&I  
7825 San Leandro St.  
August 7, 1997  
Page 2.

3. 8000 gallon 1,1,1-trichloroethane tank, removed 10/4/91

\* The approximately 180 cubic yards of soils generated from this tank removal was aerated prior to sampling. Only two samples, SPT3A and SPT3B were analyzed for chlorinated solvents via method 8010. More than two samples should have been sampled and the samples should have been tested for all potential contaminants ie TPHg, TPHd, BTEX, TOG and semi-volatiles. Recall the presence of the tarry substance which contained oil and grease and possibly PAHs. Considerable TPHg and BTEX was detected in the grab groundwater sample from this excavation.

\* On page 9 of your April 8, 1992 report, you stated that the excavation process had removed 90% of the contaminated tarry layer. How did you make this estimate?

\* In your 5/25/94 table, which summarizes the amount of soil excavated from each tank pull plus its final backfill location, it is noted that the remediated soils from the 550 gallon gasoline tank was used as backfill for the solvent tank pit. This soil, 40-60cy, accounts for only partially accounts for the amount of soil necessary to backfill this 8000 gallon tank pit. What additional soils were used backfill the solvent tank pit?

\* The 10.5' soil sample from MW-2, the well adjacent to the tank pit, exhibited 63 ppm TPHg, 140ppm TPHd and 3500 ppm oil and grease. Shouldn't the extent of this contamination be defined? Is the source of this oil and grease from the shallow tarry material? If not, what is its likely source?

\* It appears that, although you agreed to monitor MW-2 for semi-volatiles via Method 8270, it was never done. Please check to see if this analysis was ever performed. This must be done prior to site closure. Friedman and Bruya's analysis of the tarry material never analyzed for PAHs which they say are typically found in asphalt.

4. 12,000 gallon diesel tank, removed on 6/3/92.

\* Please provide a copy of the receipt for the disposal of fuel sent to California Oil Recyclers.

\* The spoils from this tank pull were biologically treated and sent to a landfill for disposal. Please provide documentation for the disposition of this soil.

Mr. Dave Robinson  
StID # 523, AB&I  
7825 San Leandro St.  
August 7, 1997  
Page 3.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

c: B. Chan, files  
questABI

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R092

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

May 18, 1994  
StID # 523

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
80 Swan Way, Rm 200  
Oakland, CA 94621  
(510) 271-4530

Mr. Dave Robinson  
American Brass and Iron  
7825 San Leandro St.  
Oakland CA 94621

**Re: Status of Subsurface Investigation at AB&I, 7825 San Leandro St., Oakland CA 94621**

Dear Mr. Robinson:

Thank you for the submittal of the requested documents included with your May 13, 1994 cover letter. We received those documents on May 17, 1994 and have completed our review. I would like to clarify our office concerns and respond to the question posed within the cover letter.

In regards to the submission of quarterly monitoring reports, it is good to hear that AB&I intends to submit such reports to our office in a timely fashion. It appears that the first quarterly event occurred in August 1993 instead of May 1993 as would have been expected. Our office has concerns regarding the contents of these reports. In the August 1993 report from BSK & Associates Figure 7, a groundwater gradient map is referenced, however, it does not appear among your submitted documents. In addition, all future reports must include:

- \* A cover letter from the responsible party, AB&I, either concurring or disagreeing with the findings of the report;
- \* A site map indicating the groundwater flow direction for the current sampling event and all previous sampling events;
- \* Tabulated analytical results from the current sampling event plus all prior sampling events;
- \* The proposed next quarter activities;
- \* A recommendation and conclusion section; and
- \* Signature by the registered professional issuing the report.

It was noted that only analytical results, field logs and quality control data was submitted for the 12/3/93 and 3/4/94 reports.

In regards to the documentation of the treatment of stockpiled soils the submission of your soil treatment diagram, though illustrative, is not sufficient. Please provide the following:



Mr. Dave Robinson  
AB&I  
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May 18, 1994  
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\* A tabulation of data, in cubic yards or tonnage amounts, which accounts for all stockpiled soils generated and reused at this site or at any other site (ie R&A Trucking).

\* Please describe the sampling procedure and sampling frequency for the verification samples.

\* Please provide copies of all certified analytical results of these verification samples.

\* For those soils disposed to an appropriate landfill, please provide copies of their waste disposal receipts.

Now that we have received the previous monitoring event results, I would like to comment on July 29, 1993 proposal included in your document package. Recall, this proposal was based on the northwesterly gradient found after the initial well sampling. Since this time, it appears that the gradient has been southwesterly, therefore, it may be appropriate to change the well point locations. I would suggest moving one well point southwest of MW-2 and another southwest of MW-1. The location of SP-2 may still be appropriate but SP-3 and SP-1 may not be upgradient as previously thought. Please provide comment to these observations prior to scheduling this work.

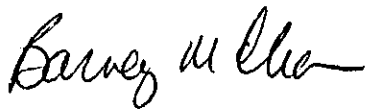
Lastly, in regards to your inquiry as to the requirements of those reviewing and requesting work, at this time, there are no registration or certification requirements for the hazardous materials specialist job class, though this job class requires knowledge in many disciplines including: hazardous materials handling, regulations, storage, sampling, analysis, toxicology and geology to mention a few.

This certification requirement, as stated in the Business and Professions Code and also stated in Professional and Vocational Regulations, is actually meant to protect the responsible party. With the many professionals offering environmental services, this requirement is meant to insure that there is a degree of consistency, reliability and accountability to all proposals, interpretations, recommendations and conclusions. It is by no means an attempt to discredit those without these qualifications.

Mr. Dave Robinson  
AB&I  
StID # 523  
May 18, 1994  
Page 3.

Please provide the requested documents and information **within 30 days or by June 20, 1994**. You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office  
T. Berger, BSK & Associates, 1181 Quarry Lane, Bld 300.  
E. Howell, files

3-ABI

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R092

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

May 9, 1994  
StID # 523

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
80 Swan Way, Rm 200  
Oakland, CA 94621  
(510) 271-4530

Mr. Dave Robinson  
American Brass and Iron  
7825 San Leandro St.  
Oakland CA 94621

**Re: Comment on July 29, 1993 Work Plan for Contaminant Plume  
Characterization at 7825 San Leandro St., Oakland 94621**

Dear Mr. Robinson:

Our office would like to comment on the above work plan prepared by your consultant, BSK & Associates. This work plan responds to my June 15, 1993 letter requesting further soil and groundwater delineation in the areas of the former TCA and gasoline tanks. It proposes three temporary well points to take soil and groundwater samples up- and downgradient to these areas. Although it would be best to evaluate the appropriateness of the locations of these well points **after** receiving all the quarterly monitoring reports, if the groundwater gradient is consistent with that which was found initially, these well points are acceptable. Mr. Tim Berger of BSK stated that the locations were proposed based on the initial gradient information. After this work is done, permanent well locations should be proposed.

Our office hopes that this work was not put on hold pending our office's approval. Please keep in mind, Section 2726 (c) of Article 11, Chapter 16 of the California Code of Regulations allows for the implementation of a work plan **sixty days** after submittal with or without agency approval.

In your response to my April 12, 1994 letter, please indicate when you plan to implement this work plan if it still is your intended approach for contaminant delineation. Please contact me **48 working hours** prior to any field activity so I may arrange to be on-site if possible. You may reach me at (510) 271-4530 if you have any questions.

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office  
T. Berger, BSK & Associates, 1181 Quarry Lane, Bld 300,  
Pleasanton, CA 94566  
E. Howell, files wpABI

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R092

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

April 12, 1994  
StID # 523

Mr. Dave Robinson  
American Brass and Iron  
7825 San Leandro St.  
Oakland CA 94621

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
80 Swan Way, Rm 200  
Oakland, CA 94621  
(510) 271-4530

**Notice of Violation**

**Re: Request for Technical Reports for Groundwater Sampling at  
American Brass and Iron, 7825 San Leandro St., Oakland 94621**

Dear Mr. Robinson:

Our office's last receipt of technical reports from AB&I consisted of a June 15, 1993 cover letter attached to the April 1993 BSK & Associates report which detailed the installation of four monitoring wells at the above site. I wrote to you in a June 18, 1993 letter commenting on this report. This letter stated our office's concerns regarding the investigation of the former TCA tank and the former gasoline tank. These areas still required investigation to determine the extent of soil and groundwater contamination. I also inquired about the disposition of all contaminated soil from the four tank removals performed at this site. I'm also concerned about all spoils taken from the tank removal and overexcavation at R & A Trucking on 77th Ave. and Hawley St. since you are helping Mr. Cole oversee this site. This June 18, 1993 letter requested a comment by August 2, 1993. Since the June 15, 1993 communication, our office has not received any comment to this letter nor have we received any subsequent quarterly monitoring reports. Since the wells were initially sampled in March of 1993, it appears that well over one year has past without the submission of any quarterly monitoring reports.

Please be reminded that Section 2652 8 (d) of Chapter 16 of Title 23 of the California Code of Regulations states that until the investigation and cleanup are complete, the owner or operator shall submit reports to the local agency every 3 months or at a more frequent interval. In addition, Section 25298 (c) 4 of the California Health and Safety Code, Division 20, Chapter 6.7 states that no person shall close an underground tank unless that person has taken steps to demonstrate to the appropriate agency that the site has been investigated to determine if there are any present, or were past releases, and if so that appropriate corrective or remedial actions have been taken. Section 25299 (5) allows for the civil penalty of not less than \$500 or more than \$5000 for each underground tank and for each day which the operator fails to properly close an underground tank.

Mr. Dave Robinson  
American Brass and Iron  
StID # 523  
April 12, 1994  
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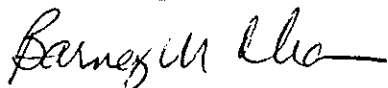
Because the monitoring wells were sampled initially in March of 1993, four additional quarterly monitoring events should have been performed. Please send the following technical reports to our office **within 30 days or by May 16, 1994:**

1. All quarterly monitoring reports after the initial monitoring well installations. Please acknowledge that you will be continuing quarterly monitoring from this point on unless you have received approval from our office or that of the RWQCB. All quarterly reports should be sent to our office no later than 45 days after the monitoring event. You are reminded to analyze MW-2 for semi-volatile compounds, Method 8270, at least once if it hasn't yet been done.
2. Provide written response as to how the extent of soil and groundwater contamination from each of the former tank pit areas will be determined. If no further work is proposed, please explain why.
3. Please give the current status of all stockpiled soils from the four tank removals at this site. If these soils are being remediated on site, please describe the process and provide a sampling and analysis procedure if you intend to reuse any of this soil as "clean fill".
4. Please keep in mind all decisions, interpretations and recommendations of a geologic nature will require the signature and stamp of currently registered professional: RG, RCE, or PE.

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Failure to submit the requested documents may subject AB&I to civil liability and referral of this site for enforcement.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office  
T. Berger, BSK & Associates, 1181 Quarry Lane, Bld 300,  
Pleasanton, CA 94566  
E. Howell, files NOVABI

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R092

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

June 18, 1993  
StID # 523

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
80 Swan Way, Rm 200  
Oakland, CA 94621  
(510) 271-4530

Mr. Dave Robinson  
American Brass and Iron Foundry  
7825 San Leandro St.  
Oakland CA 94621

**Re: Comment on April 1993 Groundwater Investigation Report  
for AB & I, 7825 San Leandro St., Oakland CA 94621**

Dear Mr. Robinson:

Thank you for submitting the above referenced report. It was received just hours after I had written and sent a request for it. I have completed my review of this report including the recommendations of your consultant, BSK. Our office agrees with their recommendations that additional investigation is warranted in the areas surrounding MW-2 and MW-4, the former trichloroethane and 550 gallon gasoline tanks respectively. Our office is willing to observe the trend of diesel concentration at MW-1 at this time through quarterly monitoring.

The soil boring sample taken from MW-2 (downgradient to the TCA tank) detected 63ppm gasoline, 140 ppm diesel and 3500 ppm TOG. Though the origin of these compounds may not be tank related, unless background levels of these materials are shown to exist within the site or the immediate area, these soil contaminants must be defined to low levels within the area around the former tank as well as defining their groundwater concentrations if any. It was noticed that volatile halogenated compounds though not reported in the analysis summary section were indeed run on this boring. However, Method 8270 for semi-volatiles was apparently not run. Recall a number of semi-volatile compounds were detected in the initial samples from the tank removal. The halogenated compounds found in the groundwater sample, though under State and EPA action limits, will need to be monitored on a quarterly basis. It was noticed that the action limit for 1,1-DCA was reported to be 0.5ppb when it actually is 5ppb.

The soil boring from MW-4 at 14.5' detected 2100 ppm gasoline and detectable concentrations of BTEX. The groundwater sample from MW-4 detected BTEX and 1800ppb gasoline. It will be therefore necessary to determine the extent of soil and groundwater contamination. The 0.058ppb of total lead reported in the groundwater sample from MW-4 is actually 0.058 ppm, exceeding the MCL for lead of 0.05ppm, therefore you will need to continue monitoring for lead as well as TPHg and BTEX.

Mr. Dave Robinson  
AB&I  
StID # 523  
June 18, 1993  
Page 2.

Please provide comment to the above items and detail how the extent of soil and groundwater contamination will be determined. You are also requested to give the status of the all the stockpile soils generated from the four tank pulls performed at this site. If soils have been remediated or disposed, please provide documentation of this. If not, please give an estimate as to their future disposition. Please provide your comment to our office within 45 days or by August 2, 1993.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,

Barney M. Chan  
Hazardous Materials Division

cc: G. Jensen, Alameda County District Attorney Office  
P. Lee, DTSC, 700 Heinz Ave., Suite 200, Berkeley,  
CA 94700-2737  
T. Berger, BSK & Associates, 1181 Quarry Lane, Blding 300,  
Pleasanton, CA 94566  
E. Howell, files

3-7825SL

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



DAVID J. KEARS, Agency Director

June 17, 1993  
StID # 523

Mr. Dave Robinson  
American Brass and Iron Foundry  
7825 San Leandro St.  
Oakland CA 94621

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
80 Swan Way, Rm 200  
Oakland, CA 94621  
(510) 271-4530

R092

**Re: Provision of Report for the Installation and Sampling of  
Monitoring Wells at 7825 San Leandro St., Oakland CA,  
94621, ABI.**

Dear Mr. Robinson:

Through a recent conversation with Mr. Tim Berger of BSK, our office was made aware that monitoring wells had been installed at the above referenced site. According to my November 25, 1992 letter to you, our office was to be contacted 48 working hours in advance of this action to be present to witness this activity if at all possible. It seems that I was not informed of the well installations. Nevertheless, our office requests that a copy of the monitoring well installation report be sent to my attention **within 30 days or by July 19, 1993.**

You should be aware that Section 2652 11 (d) of Title 23 California Code of Regulations requires the submittal of reports to the Local Implementing Agency every three months or at more frequent intervals which at a minimum give the results of all investigations and corrective actions.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office  
P. Lee, DTSC, 700 Heinz Ave., Suite 200, Berkeley, CA  
94700-2737  
E. Howell, files

2-7825Rep



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R092

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
80 Swan Way, Rm 200  
Oakland, CA 94621  
(510) 271-4530

February 10, 1993  
StID #523

American Brass and Iron  
Mr. Dave Robinson  
7825 San Leandro St.  
Oakland CA 94621

**Re: List of Parameters to be Analyzed in Monitoring Wells at  
American Brass and Iron, 7825 San Leandro St., Oakland 94621**

Dear Mr. Robinson:

This letter serves to summarize our conversation today regarding the parameters to be analyzed on the monitoring wells to be installed at the above site. The wells downgradient to the gasoline tanks and diesel tank should be analyzed as described on page 5 of BSK and Associates' workplan dated November 16, 1992. For the well downgradient to the TCA tank, you should analyze soil and water samples for chlorinated hydrocarbons, Total Petroleum Hydrocarbons as gasoline and BTEX, Oil and Grease and Semi-volatiles by Method 8270.

Our office is aware of your concern that the entire area may be heavily industrialized and thus contaminated. After reviewing your groundwater monitoring results, you may choose to verify this claim and propose an alternate method of compliance. Our office will consider this approach on a site specific basis.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Barney M. Chan".

Barney M. Chan  
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office  
R. Hiatt, RWQCB  
T. Berger, BSK & Associates, 1181 Quarry Lane, Blding 300,  
Pleasanton, CA 94566  
*E. Howell, files*  
Mon-7825

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R092

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
80 Swan Way, Rm 200  
Oakland, CA 94621  
(510) 271-4530

November 25, 1992  
STID # 523

Mr. Dave Robinson  
American Brass and Iron Foundry  
7825 San Leandro St.  
Oakland CA 94621

Re: Response to Work Plan for Shallow Soil and Groundwater  
Investigation at American Brass and Foundry,  
7825 San Leandro St., CA 94621

Dear Mr. Robinson:

Our office has received and reviewed the November 16, 1992 work plan for soil and groundwater investigation for the above site as provided by BSK & Associates. The general approach of installing one monitoring well in the assumed downgradient location relative to the former tank locations is acceptable. However, our office has the following concerns which still need to be addressed:

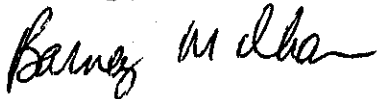
1. Task 1 states that a work plan which describes the rationale and methods to be used in the field investigation along with addressing other County concerns including copies of manifests, status of excavated soil and treated and disposed groundwater will be written. When will this portion of the workplan be provided to this office?
2. It is assumed that the reason you are proposing a four inch well near the former TCA tank pit is that groundwater treatment will likely be required. To this end, please inform our office what type of groundwater treatment and associated equipment will be used in this well. You should be aware that the screen interval in this well should account for any DNAPLs.
3. Task 3 states that one soil boring will be augered to a depth just above the groundwater table at the location depicted on Figure 2, Site Plan. It appears that in the figure, the proposed location of the boring is to the north of the former tank, however, residual soil contamination was found in sample T2-S6 to the south of the former tank. Therefore, the soil boring, more logically, should be to the south of the former tank. The extent of additional soil contamination to the west side of the pit (next to the building) still remains in question. Will any attempt be made to determine the extent of this contamination?

Mr. Dave Robinson  
STID # 523  
American Brass and Iron  
November 25, 1992

Please provide a written response to the above issues within 30 days of receipt of this letter. You may proceed in the installation of wells but you should notify our office within 48 working hours prior to this activity should we choose to witness the work.

You may contact me at (510) 271-4530 should you have any questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office  
R. Hiett, RWQCB  
T. Berger, BSK & Associates, 1181 Quarry Lane, Bld 300,  
Pleasanton, CA 94566  
E. Howell, files

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ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R092

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
80 Swan Way, Rm 200  
Oakland, CA 94621  
(510) 271-4530

October 2, 1992  
STID # 523

Mr. Dave Robinson  
American Brass and Iron Foundry  
7825 San Leandro St.  
Oakland CA 94621

Re: Request for Work Plan for Subsurface Investigation at  
American Brass and Iron Foundry (AB&I),  
7825 San Leandro St., Oakland 94621

Dear Mr. Robinson:

Thank you for the submission of the underground tank closure report for the removal of the 12,000 gallon diesel fuel tank. As you stated in the report this concludes the series of tank removals at this site. At this time, our office requests a work plan for the investigation of subsurface soil/groundwater contamination for the entire site. As you are aware, there were verified releases of petroleum and/or solvents at the four former tank sites.

I would like to summarize each of the four tank removals while giving comment and posing questions to be answered in your work plan submittal.

On 8/8/91 Mr. Scott Seery of this office witnessed the removal a 8000 gallon gasoline tank. There was water in the excavation pit. It was sampled and the analytical results indicated 30 mg/l TPHg and 0.313, 0.26, 2.3 and 14 mg/l BTEX respectively. An initial soil sample, T1N-10.5 indicated 820 ppm TPHg and 40 and 120 ppm ethyl benzene and xylenes respectively. It appears that overexcavation at this location was successful in removing all but low levels of petroleum contamination. Our office requests a copy of the receipt for the disposal of the 2-55 gallon drums of rinsate generated during the removal. Our office also requests a copy of the manifest for the underground tank. Much of the contaminated water found during the removals of the tanks, I understand, was treated on-site through your company's water treatment system and then disposed of into the storm drain. Please verify that the Regional Water Quality Control Board, RWQCB, was notified and approved of such activities. A minimum of one monitoring well will be required in the verified down-gradient location, within 10 feet of the final excavation perimeter, to evaluate groundwater impact.

Mr. Dave Robinson  
AB&I  
STID #523  
October 2, 1992  
Page 2.

On 8/26/91 Mr. Dennis Byrne of our office witnessed the removal of a 550 gallon gasoline tank. The initial soil results from the north end of the tank indicated Total Petroleum Hydrocarbons as gasoline, TPHg, in the amount of 2,000 ppm. Overexcavation was performed however two areas were not able to be excavated to non-detectable levels due to physical constraints, ie to the northwest and to the south of the original tank pit.

Levine-Fricke, your consultant, recommended the determination of the lateral and vertical extent of contamination through soil borings or a soil-gas survey and the installation of a minimum of one monitoring well in the appropriate downgradient location. Our office requests a copy of the manifest for the disposal of this tank. Please account for the stockpile soils generated from this excavation and for the soil used to backfill the pit.

On 10/3/91 Mr. Barney Chan of this office witnessed the removal of a 8000 gallon 1,1,1-trichloroethane, (1,1,1-TCA), tank. Although the soil samples taken around the tank did not indicate any solvent contamination, the soil sample, T3-N-10, did show 500 mg/kg TPHg. In addition, a water sample taken from the pit showed 22 ppm 1,1,1-TCA, 4.9ppm 1,1-dichloroethane, 0.7 ppm chloroethane and 11 ppm TPHg and 0.13, 0.31, 0.26, 2.2 mg/l BTEX respectively. As you pointed out in the tank closure report, another significant contaminant noticed was that of a tar-like petroleum substance oozing from the north side of the pit. Although the expert opinion of Friedman and Bruya state that this substance would be water insoluble, it will be necessary to determine the amounts of oil and grease, semi-volatiles and any other petroleum hydrocarbon which this material contributes to the groundwater. The various semi-volatiles detected will need to be quantified to determine if any MCLs or other action limits are exceeded. The MCLs of both 1,1,1-TCA and 1,1-DCA were exceeded by 100-1000 fold and therefore some type of water treatment will be necessary to reduce their concentrations in groundwater. Our office requests an accounting of the stockpiled soils generated at this tank removal along with those soils used for backfilling the pit.

It was noticed that you authored both closure reports for the solvent and the diesel tank removals. Your knowledge and expertise in subsurface investigations is noted but you should be aware that our office requires the signature and seal of either a Registered Geologist, Certified Engineering Geologist or a Registered Civil Engineer for those individuals evaluating or making recommendations of a geologic nature.

Mr. Dave Robinson  
AB&I  
STID # 523  
October 2, 1992  
Page 3.

On 6/3/92, Barney Chan witnessed the removal of a 12000 gallon diesel tank, as the last of a series four tank removals. Obvious diesel spillage was noticed floating on the top of the water in the pit. In fact, the analysis of this water sample showed 6.8 mg/l TPHd. As mentioned in your report, the soil contamination was extensive and it was necessary to delay the normal soil sampling activities. It was unfortunate that our office was not notified about witnessing the samplings after overexcavation. The field notes of Mr. Michael Stoll of Levine-Fricke states that you said the County was not needed to witness the sampling. I believe I made a point on 6/3/92 that I be contacted to witness the soil sampling after overexcavation was performed. This is a procedure common to our office. In the event that I personally could not be available, another staff member would likely be present to take my place. As mentioned in your report, there seems to be an ambiguity in the soil and groundwater results taken. That is, the water sample contained 6.8 ppm TPHd while the soil samples were all less than this concentration. Another field note of Mr. Stoll's states that the backfill for the pit was material which was not ND but that you stated the results were "good enough". Please give the status of the excavated soils and the analytical results of the soils used for backfilling the pit. In addition, our office requests copies of signed analytical reports for all results reported for this tank removal.

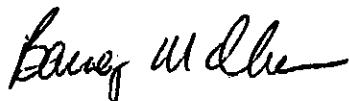
Enclosed please find a copy of Appendix A, a document from the RWQCB, which states the general contents of an initial workplan for subsurface investigation. You may use this as a guide. Please submit an appropriate workplan to address the four areas of your site within **45 days** of receipt of this letter.

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). All workplans, analytical results or reports should be sent to our office and to that of the RWQCB to the attention of Mr. Rich Hiett. Their address is 2101 Webster St., Suite 500, Oakland CA 94612. Be aware that failure to submit the requested documents may subject AB&I to civil liabilities. In addition, please be aware that Section 25298 (c) 4 of the California Health and Safety Code (CH&SC) states that no person shall close an underground tank unless that person has taken steps to demonstrate to the appropriate agency that the site has been investigated to determine if there are any present or past releases and if so that appropriate corrective or remedial actions have been taken. Civil penalties of up to \$5000 per day per each tank which the owner or operator fails to properly close are allowed by Section 25299 (5).

Mr. Dave Robinson  
AB&I  
STID # 523  
October 2, 1992  
Page 4.

You may contact me at (510) 271-4350 should you have any questions regarding this letter.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

enclosure (Mr. Robinson only)

cc: M. Thomson, Alameda County District Attorney Office  
R. Hiett, RWQCB  
J. Sturman, Levine-Fricke, 1900 Powell St., 12th Floor,  
Emeryville, CA 94608  
E. Howell, files

ABI-wp

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R092

March 19, 1991

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(415)

Mr. Greg Soloman  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109

RE: AMERICAN BRASS AND IRON FOUNDRY COMPANY, 7825 SAN LEANDRO  
STREET, OAKLAND, ALAMEDA COUNTY, CA 94621

Dear Mr. Soloman:

This Department is presently investigating the facts associated with the apparent unlawful disposal of foundry sands at an industrial site within the City of Fremont. As we understand the facts, the noted foundry sands, some 2500 yards<sup>3</sup>, originated from the referenced American Brass and Iron Foundry Company facility sometime during 1986.

The noted sands have been the subject of several sampling events during the last several years, one facet of an ongoing environmental assessment and remediation project occurring at this site prior to its development. Elevated levels of certain metals, particularly lead, have been identified during at least one of the sampling events. No other target compounds have been sought.

Currently, the Department is attempting to research pertinent records which could identify the potential for other contaminants being present in the noted foundry sands. Of specific interest to us are those contaminant compounds generated or collected incidental to the operation of air pollution abatement devices, e.g., bag house, wet scrubber, and hydro-static precipitator waste, among others. Our current focus will be those systems operating during or before the period the subject foundry sands were disposed in Fremont.

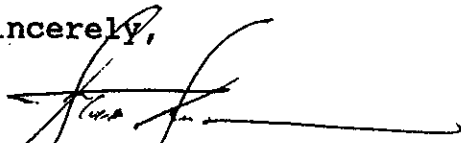
The Department respectfully requests access to any and all information the District may have in its files which could potentially aid in our investigation. The importance of this investigation can not be overstated: the health of the environment and public is at stake. Further, the manner with which the foundry sands are ultimately treated and/or disposed must reflect applicable state and federal laws and regulations. Proper application of such laws and regulations is based upon knowledge of the foundry sand's hazardous constituents.



Greg Soloman  
RE: 7825 San Leandro Street, Oakland  
March 19, 1991  
Page 2 of 2

I anticipate that I will be at the District office on Thursday, March 21, arriving in the late morning. Please call me should you have any questions or require any additional information.

Sincerely,



Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health  
Edgar Howell, Chief, Hazardous Materials Division  
Gil Jensen, Alameda County District Attorney's Office  
Elizabeth Stowe, City of Fremont  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

J. MICHAEL LEAHY, Agency Director



R092

470-27th Street, Third Floor  
Oakland, California 94612  
(415)

October 20, 1987

American Brass & Iron Foundry  
c/o Don Wilson  
7825 San Leandro St.  
Oakland, CA 94621

RE: UNDERGROUND STORAGE TANK REMOVAL

Dear Mr. Wilson:

This letter confirms our conversation on October 8, 1987, concerning the unapproved removal of two or more underground storage tanks from 7825 San Leandro St., Oakland, CA. As discussed, the removal of such tanks without a preapproved closure plan, is in violation of the California Health and Safety Code, Chapter 6.7, and the California Administrative Code, Title 23, Subchapter 16.

Though the tanks in question have been removed, you are still required to meet State Law and Administrative Guidelines. A closure plan must be filed and the appropriate regulatory agencies contacted. At minimum, the plan must include the following:

1. Health and safety element
2. Disposal and/or cleaning of all tanks removed, including manifest and/or bills of lading
3. Disposal site of tanks and/or rinsate, if tanks were cleaned on site.
4. Disposal of any soil exceeding 1,000 TPH or on site aeration procedure and BAAQMD notification and approval of aeration method.
5. The location and sampling schedule to be followed for water monitoring wells where the TPH has exceeded 100 ppm in the soil.

By copy of this letter, the Regional Water Quality Control Board is being notified of the actions required for this site.

American Brass & Iron Foundry  
7825 San Leandro St.  
Oakland, CA 94621  
October 20, 1987  
Page 2 of 2

Upon submission of the plan of correction, it's approval, and the documents, including lab reports, manifests, etc., a letter of receipt will be issued. Upon completion of the plan of correction, a letter so stating will be issued, however, the final closure letter concerning this site, must be obtained from the Regional Water Quality Control Board.

You are requested to respond to this Department within two weeks from the date of this letter. Be advised that you are now in violation of Section 25299, of the California Health and Safety Code and as much, are liable for civil penalties of up to \$5,000 per day.

If you have any questions concerning this matter, please contact, Mr. Ariu Levi, Hazardous Materials Specialist, at 874-7237.

Sincerely,

*R/ASW*

Rafat A. Shahid, Chief,  
Hazardous Materials Division

RAS:AL:mnc

cc: RWQCB  
Oakland Fire Department