ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

F

July 26, 2007

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

Subject: Fuel Leak Case No. RO0000092 and Geotracker Global ID T0600100065, American Brass & Iron Foundry, 7825 San Leandro Street, Oakland, CA 94621

Dear Mr. Robinson:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted document entitled, "Site Investigation Work Plan," dated July 9, 2007 and prepared on your behalf by The Source Group, Inc. The Site Investigation Work Plan proposes soil gas sampling, soil borings, and grab groundwater sampling to define the extent of contamination from former USTs at the site. We request that you submit a revised Work Plan that addresses the technical comments below and includes more detailed maps of each of the UST areas where additional investigation is proposed.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Former 8,000-Gallon Gasoline UST.** The Site Investigation Work Plan does not propose further investigation of the former 8,000-gallon gasoline UST located in the parking lot north of the Main Office Building. We are not requesting additional soil borings in the vicinity of the former 8,000-gallon UST at this time. However, collection of groundwater samples from monitoring well MW-3 is required. Please see technical comment 11 below regarding sampling and analyses of the existing monitoring wells.

2. **Former 550-Gallon Gasoline UST.** The Site Investigation Work Plan proposes advancing five soil borings and collecting three soil gas samples and two grab groundwater samples in the area of the former 550-gallon gasoline UST. Based on review of the report entitled, "Report on Removal of 550-Gallon Capacity Underground Gasoline Storage Tank," dated January 31, 1992, excavation of gasoline-contaminated soil was terminated to the west to avoid potential structural damage to the adjacent building and concrete wall. Excavation was also terminated to the south to allow vehicle traffic to continue during the tank removal. No excavation or sampling appears to have taken place near the former gasoline dispenser, which was west of the concrete wall (see attached Former 550-Gallon Gasoline UST figure). We request that you submit a Revised Work Plan that includes a more detailed map with proposed sampling locations in the area of the former 550-gallon UST. Recommended soil vapor, soil, and grab groundwater sampling locations are also shown on the attached Former

550-Gallon Gasoline UST figure. We request that the central boring within the tank excavation be extended to a minimum depth of 30 feet bgs in order to define the vertical extent of contamination. The central boring is to be extended greater than 30 feet bgs if staining, odor, or elevated PID readings are observed in the lower five feet of the boring. The remaining four soil borings located outside the former excavation are to be extended to a minimum depth of 15 feet bgs. Soil samples are to collected continuously and logged in the field for soil type, color, moisture content, odor, and other observed features and screened with a photoionization detector. Soil samples are to be collected for laboratory analysis at any interval where visible staining, odor, or elevated PID readings are observed. If visible staining, odor, or elevated PID readings are observed, a sufficient number of soil samples must be collected to characterize the vertical interval over which the contamination occurs. If no visible soil staining, odor, or elevated PID readings are observed in the soil boring, we request that a minimum of four soil samples be collected for laboratory analyses from each soil boring. The Work Plan currently proposes the collection of soil samples for chemical analyses from depths of 0.5, 2.0, and 5.0 feet bgs and at lithologic changes. We note that the fixed depth intervals of 0.5, 2.0, and 5.0 feet bgs are above the depth of the former UST. We have no objection to collecting soil samples for chemical analyses at these depth intervals in the area of the former gasoline dispenser and to help characterize the shallow fill. However, chemical analyses of deeper soil samples will be required to characterize soil contamination from the former UST. We request that you present a table of proposed soil samples for chemical analyses in the Revised Work Plan requested below. Within the central soil boring, depth-discrete grab groundwater samples are to be collected from first encountered groundwater and all significant water-bearing layers below 15 feet bgs to define the vertical extent of groundwater contamination.

3. **Soil and Groundwater Contamination from Former 1,1,1-TCA UST.** The Site Investigation Work Plan proposes advancing five soil borings and collecting six soil gas samples and three grab groundwater samples in the area of the former 1,1,1-TCA UST. Based on review of the report entitled, "Report on Removal of 8,000-Gallon Capacity Underground TCA Storage Tank," dated April 8, 1992, elevated concentrations of VOCs including 1,1,1-TCA (up to 22,000 micrograms per liter [µg/L]) were detected in a water sample collected from the tank pit. Elevated concentrations of VOCs have also been detected in groundwater collected from monitoring wells MW-8 and MW-3, which are located approximately 65 and 250 feet, respectively, northwest to north of the former 1,1,1-TCA UST. We request that you revise the Site Investigation Work Plan to include a more detailed map with proposed sampling locations in the area of the former 1,1,1-TCA UST (see attached Former 1,1,1-TCA UST figure). In order to better define the extent and direction of plume migration, please consider advancing borings along transects downgradient from the former 1,1,1-TCA UST. Please present your plans for investigation of the former 1,1,1-TCA UST in the revised Work Plan requested below.

4. **Tar Layer in Area of Former 1,1,1-TCA UST.** A tar layer was observed during removal of the 1,1,1-TCA UST. Although most of the tar was removed, a portion of the tar layer in the northern wall of the excavation was inaccessible beneath the Main Office Building foundation. The Work Plan proposes advancing one angled boring beneath the Main Office Building to collect a soil sample of the tar material for laboratory analyses. Advancing one angled boring for sampling the tar layer is acceptable.

5. **Former 10,000-Gallon Diesel UST (Also Referred to as 12,000-Gallon Diesel UST).** Further investigation is required in the area of the former 10,000-gallon diesel UST and monitoring well MW-7. The boring log for well MW-7 indicates that a strong hydrocarbon odor was observed between approximately 7 and 10 feet bgs and a faint odor was observed below 14 feet bgs. Well MW-7 is approximately 60 feet north of the former 10,000-gallon diesel UST. A groundwater sample collected from well MW-7 in 2006 contained 520 µg/L of TPH as diesel. We request that you conduct further investigation to assess whether soil and groundwater in the area of the former 10,000-gallon diesel UST is the source of a hydrocarbon plume extending to well MW-7. Please present your plans in the Revised Site Investigation Work Plan requested below.

6. **Three Former 10,000-Gallon Gasoline USTs.** No tank removal report or other information is present in ACEH files regarding the removal of the three former 10,000-gallon USTs in the Finished Good Storage area. At present, there is little basis for evaluating the proposed scope of work. Please submit any available information regarding the observed conditions and sampling results from the UST removal. A groundwater sample collected from well MW-9 contained 7,400 µg/L of TPH as gasoline, indicating that groundwater is contaminated in the area of the former USTs. Please present the proposed sampling locations on a more detailed base map in the Revised Site Investigation Work Plan requested below. We note that the approximate location of the three USTs is significantly different on Figures 2 and 3 of the Work Plan. If more detailed information cannot be provided regarding the former UST locations and removal, additional sampling locations may be required.

7. **Proposed Sampling Location in Southwest Corner of Shipping Yard.** We have no objection to the proposed sampling location in the southwest corner of the shipping yard. In the Revised Work Plan requested below, please clarify the sampling methods and analyses proposed for this sampling location.

8. **Proposed Sampling Location to Evaluate the Extent of Petroleum and VOCs in Groundwater Downgradient of the Site.** Delineation of the downgradient extent of the VOC plume from the 1,1,1-TCA UST will be required. The proposed downgradient groundwater sampling location is more than 300 feet from the former 1,1,1-TCA UST. We request that you conduct plume delineation within closer proximity to the source area. Please review the request in technical comment 3 to advance borings along transects to better define the extent and direction of VOC plume migration.

9. **Elevated Concentrations of Metals in Soils.** Elevated concentrations of metals were detected in soil samples collected from 3 of the 5 monitoring well borings advanced in August 2006. With the exception of well MW-9, these wells are not located in close proximity to the former USTs. The elevated concentrations of metals do not appear to be related to releases from the USTs. Further investigation of elevated concentrations of metals in fill at the site will be required outside of this investigation of the USTs. We concur with the proposal to analyze selected soil samples for metals to initially characterize the vertical extent of metals in soil. In the Revised Work Plan requested below, please expand the discussion of which soil samples will be analyzed for metals.

10. **On-Site Water Supply Well.** In the Work Plan requested below, please provide information on the construction details and estimated historical and current daily volume of water extracted from the on-site water supply well. Please also describe future plans for operation of the on-site water supply well.

11. **Groundwater Sampling.** The proposed methods for sampling the nine existing monitoring wells are acceptable. We request that groundwater sampling be conducted and reported on a quarterly basis following implementation of the proposed investigation.

TECHNICAL REPORT REQUEST

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

- **September 28, 2007** – Revised Work Plan
- **45 days after end of each quarter** – Quarterly Monitoring Report

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

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 visit the SWRCB website for more information on these requirements (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.

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

Attachments: 550-Gallon Gasoline UST Figure (LFR 1992-01-31)
8,000-Gallon 1,1,1-TCA UST Figure (LFR 1992-04-08)
10,000-Gallon Diesel UST Figure (LFR 1992-09-08)

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Nathan Colton
The Source Group, Inc.
3451-C Vincent Road
Pleasant Hill, CA 94523

Kent Reynolds
The Source Group, Inc.
3451-C Vincent Road
Pleasant Hill, CA 94523

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

550● Gallon Gasolin● UST

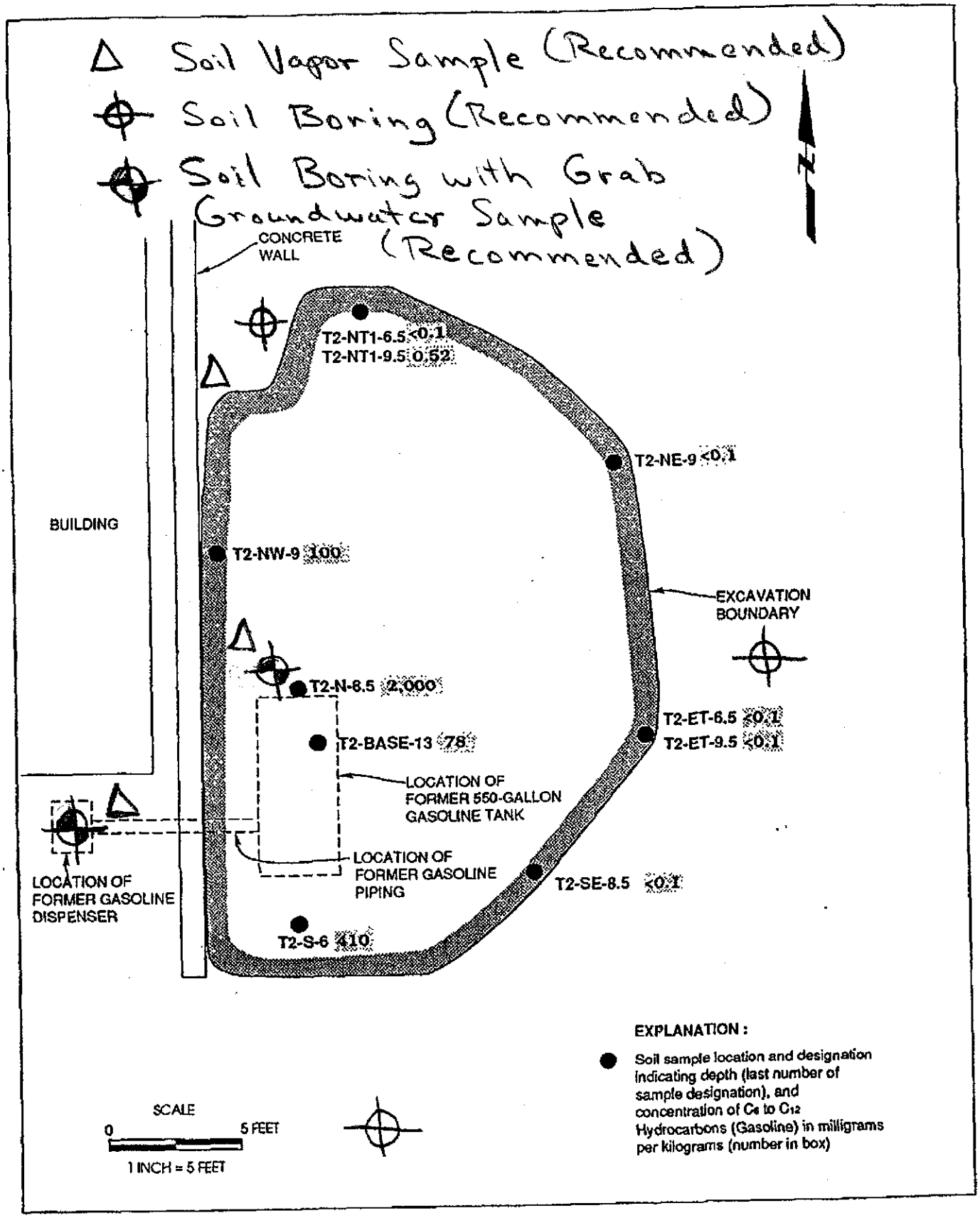


Figure 2 : SITE PLAN SHOWING FORMER TANK LOCATION, EXCAVATION AND SOIL SAMPLE LOCATIONS

Project No. 2408

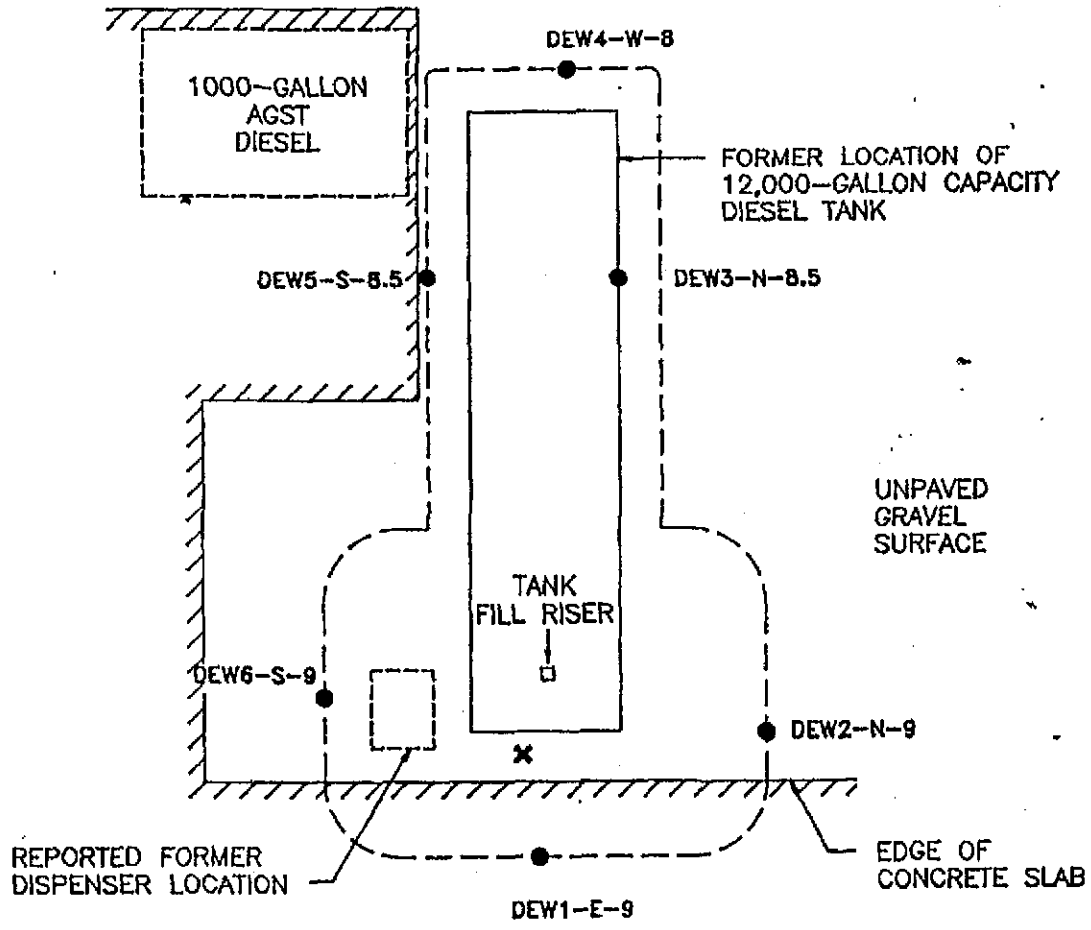
LEVINE•FRICKE
ENGINEERS, HYDROGEOLOGISTS & APPLIED SCIENTISTS

2408-01

JOS15JA.J92|sm

Report dated 1992-01-31

10,000-Gallon Diesel UST



EXPLANATION

- ● Soil sample location (depth in feet is last number)
- ✖ Excavation water sample location

0 5 10 FEET

Figure 2 : PLAN SHOWING FORMER TANK AND SOIL SAMPLE LOCATIONS

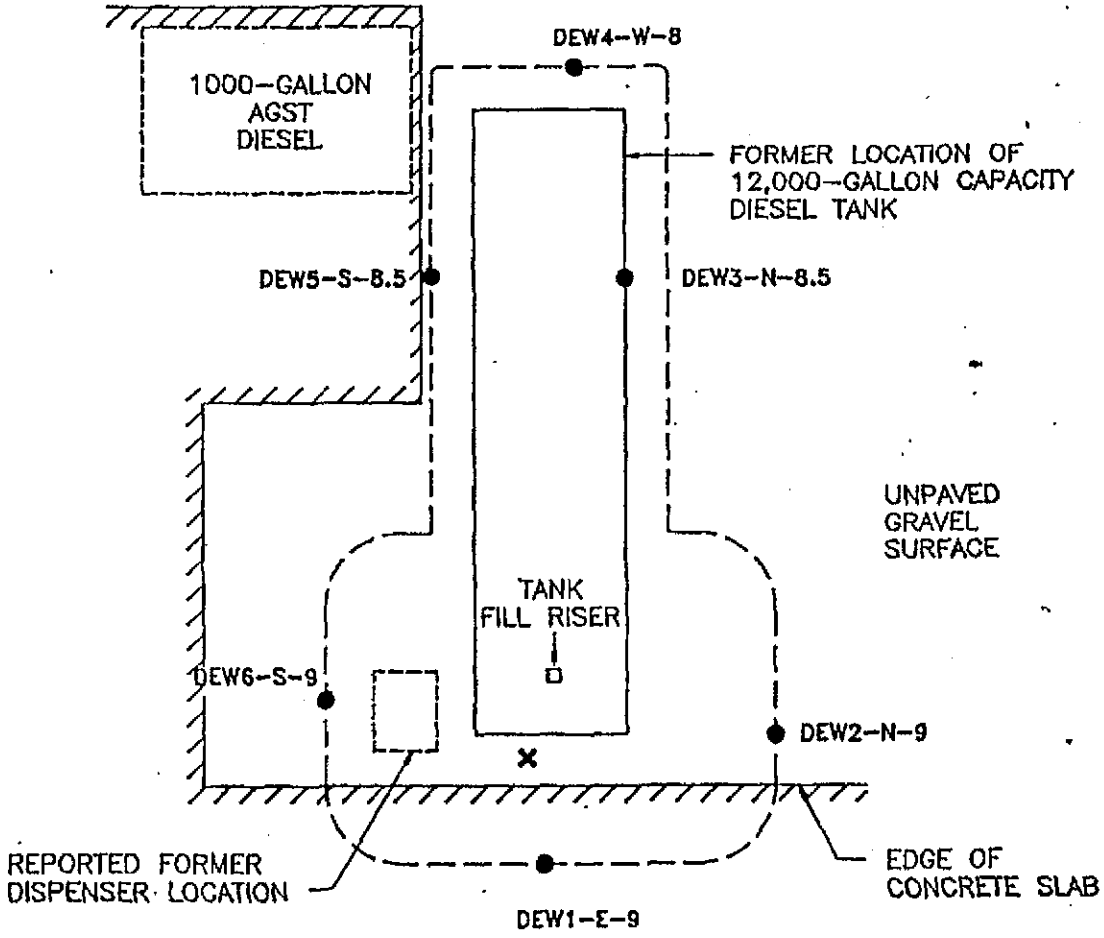
Project No. 2408.01

LEVINE•FRICKE
ENGINEERS, HYDROGEOLOGISTS, & APPLIED SCIENTISTS

2408S001.JOS:EM 070192

Report dated 1992-09-08

12,000-gallon Diesel



EXPLANATION

- ● Soil sample location (depth in feet is last number)
- ✖ Excavation water sample location

N

0 5 10 FEET

Figure 2 : PLAN SHOWING FORMER TANK AND SOIL SAMPLE LOCATIONS

Project No. 2408.01

LEVINE•FRICKE
ENGINEERS, HYDROGEOLOGISTS, & APPLIED SCIENTISTS

2408S001.JOS:EM 070192