

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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September 21, 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, "Revised Site Investigation Work Plan," dated September 17, 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.

The proposed scope of work is acceptable and may be implemented provided that the technical comments below are addressed during the proposed field investigation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below 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. Proposed Boring Locations with Grab Groundwater Samples along Downgradient Transect from 1,1,1-TCA UST.** We request modifications to three of the proposed soil borings with grab groundwater samples along the downgradient transect from the 1,1,1-TCA UST transect as shown on the attached sampling location map (Attachment A). We request that two of the boring locations, which are next to existing *monitoring wells* MW-3 and MW-5 be moved to avoid replicating results data from the existing wells. A more proximal location is recommended for the third revised boring location shown on Attachment A in order to provide better plume delineation. Please present results from soil and groundwater sampling in the Site Investigation report requested below.
- 2. Former 10,000-Gallon Diesel UST (Also Referred to as 12,000-Gallon Diesel UST).** The proposed scope of work for the former 10,000-gallon diesel UST is generally acceptable. However, we request that the proposed soil and grab groundwater sampling location adjacent to MW-7 be moved closer to the former UST as shown on Attachment A in order to assess whether a plume extends between the former UST and MW-7. Please present results from soil and groundwater sampling in the Site Investigation report requested below.

3. **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:

- **February 8, 2008** – Site Investigation Report
- **60 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

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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

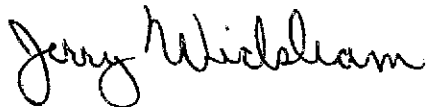
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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

Attachment A: Recommended Revisions to Sampling Locations

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

Attachment A: Recommended Sampling Locations

