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

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March 27, 2008

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 Report*," dated February 14, 2008 and prepared on your behalf by The Source Group, Inc. The Site Investigation Report presents results from soil vapor sampling, soil borings, and groundwater sampling to define the extent of contamination from former USTs at the site.

Total petroleum hydrocarbons as gasoline were detected in soil in the Three Former 10,000-galllon USTs area, Former 550-gallon UST area, and Former 8,000-gallon mineral spirits/1,1,1-TCA UST area at concentrations up to 1,400 milligrams per kilogram (mg/kg) and 11,000 micrograms per liter (µg/L), respectively. Total petroleum hydrocarbons as diesel were detected in soil in the Three Former 10,000-galllon USTs area, Former 550-gallon UST area, Former 8,000-gallon mineral spirits/1,1,1-TCA UST area, and Former 10,000-gallon UST Area at concentrations up to 5,700 mg/kg and 37,000 µg/L, respectively. Benzene was detected in 4 of the 10 soil vapor samples collected at concentrations up to 0.96 µg/L. The report concluded that the site is a "low risk release site," and recommended continued groundwater monitoring and preparation of a construction risk management plan. As discussed in our technical comments below, the site does meet the criteria for a "Low-Risk Fuel Site," as described in the San Francisco Bay Regional Water Quality Control Board document entitled, "Regional Board Supplemental Instructions to State Water Board December 8, 1995, Interim Guidance on Required Cleanup at Low-Risk Fuel Sites." Further characterization of the site is required.

We request that you prepare a Work Plan that includes site conceptual models to address the technical comments below.

TECHNICAL COMMENTS

1. **Table 2 – Summary of Soil Gas Sample Results.** The concentrations of benzene in soil gas reported in Table 2 are incorrect (reversed) for samples SG-1 and SG-8. The laboratory analytical reports in the appendix indicate that soil gas sample SG-1 contained <0.008 µg/L and sample SG-7 contained 0.31 µg/L of benzene. Please correct the table in future reports. More importantly, it should be noted that the concentration of benzene detected in 4 of the 10

soil gas samples exceeds the ESL for residential land use and the concentration of benzene detected in 2 of the 10 soil gas samples exceeds the ESL for commercial land use. The report incorrectly states throughout the text that no soil gas samples contained benzene at concentrations exceeding the ESL for either residential or commercial land use.

2. **Soil Vapor Sample Results for Former 550-Gallon UST Area.** Benzene was detected at a concentration of 0.96 µg/L in soil vapor sample SV-5, which was apparently collected near the former fuel dispenser in the Former 550-Gallon Gasoline UST area. Benzene was also detected in soil vapor sample SV-4, which is located approximately 40 feet west of the former dispenser. In future reports, please include soil vapor sampling locations on the more detailed site maps presented in the report. 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. No excavation appears to have taken place near the former gasoline dispenser, which was west of the concrete wall. The potential for vapor intrusion to indoor air must be evaluated for the adjacent office building. Sub-slab sampling should be considered as one method for evaluating potential vapor intrusion. Please include plans for evaluating potential vapor intrusion to indoor air in the Work Plan requested below. The Work Plan should include maps showing room layouts and types of activities conducted in the portion of the office building adjacent to the former dispenser and 550-gallon gasoline UST.

3. **Conceptual Model for VOC and Hydrocarbon Plume.** Petroleum hydrocarbons and VOCs have been detected in groundwater within the area of the Former 8,000-gallon mineral spirits/1,1,1-TCA UST (solvent tank). Figure 13 (Groundwater Analytical Results – Chlorinated VOCs) shows a VOC plume that begins more than 100 feet northwest of the former solvent tank. Please review current and past activities within the area between the solvent tank and plume and discuss the potential for solvents to have been discharged from locations other than the solvent tank. We request that you prepare a conceptual site model that evaluates the potential sources, contaminant migration pathways, and potential receptors for the petroleum hydrocarbons and VOCs within the area of and downgradient of the Former 8,000-gallon mineral spirits/1,1,1-TCA UST. The on-site water supply well is to be included as a potential receptor. Please present any sampling results you may have for VOCs and petroleum hydrocarbons in water from the on-site supply well. In the Work Plan requested below, please present the site conceptual model and plans for investigation to address data gaps identified in the site conceptual model.

4. **Downgradient Borings in West Parking Lot.** Core recovery was severely limited in downgradient borings SB-35 and SB-36 apparently due to gravelly soils in the upper 20 feet. Please review the boring logs in this area and present an evaluation of the origin of the coarse-grained soil and whether gravelly soils at the site may represent preferential pathways for contaminant transport. Please incorporate this discussion into the site conceptual model for the VOC and hydrocarbon plume requested in technical comment 3.

5. **Conceptual Model for Former Fuel Dispenser Islands (Three 10,000-Gallon USTs).** The highest concentrations of dissolved fuel hydrocarbons were detected in groundwater samples collected from monitoring well MW-9 and soil borings SB-7 through SB-9, located west of the former dispenser islands. We request that you prepare a conceptual site model that

evaluates the potential sources, contaminant migration pathways, and potential receptors for the petroleum hydrocarbons within the area of and downgradient of the Former Fuel Dispenser Islands. In the Work Plan requested below, please present the site conceptual model and plans for investigation to address data gaps identified in the site conceptual model.

6. **Vertical Delineation.** Soil borings and monitoring wells have extended to a maximum depth of approximately 20 feet bgs. We request that you conduct further investigation to define the vertical extent of contamination in the area of the Three Former 10,000-galllon USTs, Former 550-gallon UST, and Former 8,000-gallon mineral spirits/1,1,1-TCA UST. Please consider the potential for vertical downward hydraulic gradients and contaminant migration at the site due to historic and current on-site groundwater extraction. Present plans to define the vertical extent of contamination in the Work Plan requested below.

7. **Soil Vapor Sample SV-10.** Soil vapor sample SV-10, which was collected from a location near monitoring well MW-8, contained 0.21 µg/L of benzene but did not contain 1,1-DCA, 1,1-DCE, 1,1,1-TCA, and TPHg at concentrations above the reporting limit. Groundwater collected from monitoring well MW-8 did not contain benzene at a concentration above the reporting limit but did contain 1,1-DCA, 1,1-DCE, 1,1,1-TCA, and TPHg. Please discuss possible reasons for this discrepancy in sampling results and propose any additional investigation necessary to evaluate soil vapor and groundwater data in this area.

8. **Screening Level Risk Assessment.** We do not concur with the findings of the Screening Level Risk Assessment (SLRA). The SLRA is based on an assumption that the concentrations of VOCs in soil gas do not exceed ESLs for vapor intrusion to indoor air for residential or commercial land use. As discussed in technical comment 1, the concentrations of benzene detected in soil vapor exceed the ESL for residential land use in 4 of 10 soil gas samples and exceed the ESL for commercial land use in 2 of 10 soil vapor samples. It should also be noted that the reporting limit for vinyl chloride exceeds the ELS for residential land use and is equal to the ESL for commercial land. In addition, the SLRA is not acceptable because it does not include any analysis for potential future receptors. As an example, the SLRA dismisses potential risk from 1,1,1-DCA and vinyl chloride in groundwater because these chemicals were detected beneath the parking lot. Potential future risks must be considered for the construction of new facilities.

9. **Groundwater Sampling.** Quarterly groundwater sampling and reporting is to be implemented for this site. Sampling and analysis is to be conducted according to the methods and analyses proposed in the "*Revised Site Investigation Work Plan*," dated September 17, 2007.

TECHNICAL REPORT REQUEST

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

- **June 6, 2008** – Work Plan

- **April 25, 2008** – Groundwater Monitoring Report for First Quarter 2008
- **July 25, 2008** – Groundwater Monitoring Report for Second Quarter 2008
- **October 24, 2008** – Groundwater Monitoring Report for Third Quarter 2008
- **February 25, 2009** – Groundwater Monitoring Report for Fourth Quarter 2008

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 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,

Jerry Wickham

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

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

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	**ISSUE DATE:** July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	**SUBJECT:** Electronic Report Upload (ftp) Instructions

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.

REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.** (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:
  RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

Submission Instructions

1) Obtain User Name and Password:
   a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
      i) Send an e-mail to dehloptoxic@acgov.org
         or
      ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
   b) In the subject line of your request, be sure to include **"ftp PASSWORD REQUEST"** and in the body of your request, include the **Contact Information, Site Addresses**, and the **Case Numbers (RO# available in Geotracker) you will be posting for.**

2) Upload Files to the ftp Site
   a) Using Internet Explorer (IE4+), go to ftp://alcoftp1.acgov.org
      (i) Note: Netscape and Firefox browsers will not open the FTP site.
   b) Click on File, then on Login As.
   c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
   d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
   e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.

3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
   a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
   b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., firstname.lastname@acgov.org)
   c) The subject line of the e-mail must start with the RO# followed by **Report Upload.** (e.g., Subject: RO1234 Report Upload)