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

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November 4, 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, "*Report for Additional Site Investigation*," dated September 25, 2008 and prepared on your behalf by The Source Group, Inc. The Site Investigation Report presents results from soil and groundwater sampling to define the extent of contamination from former USTs at the site and from soil vapor sampling to assess the potential for vapor intrusion to the office building located adjacent to the former 550-gallon UST.

Total petroleum hydrocarbons (TPH) and chlorinated volatile organic compounds (VOCs) are present at elevated concentrations in shallow groundwater. Benzene and vinyl chloride have been detected in soil vapor at maximum concentrations that exceed screening levels for potential vapor intrusion into indoor air under a commercial/industrial land use scenario.

The "*Report for Additional Site Investigation*," recommends an additional soil vapor survey from beneath the concrete slab in areas of the office building, development of a risk management plan to address potential human health risks, and a deed restriction to be implemented as part of site closure. We concur with the recommendation to collect additional soil vapor samples beneath the concrete slab in and adjacent to the office building. However, we do not concur with the recommendations to implement a risk management plan and deed restriction to address potential human health risks at the site. As discussed in technical comments 2 and 3 below, corrective action is needed in the Former 8,000-gallon mineral spirits/1,1,1-TCA UST area and Three Former 10,000-gallon USTs area. We request that you address the technical comments below, implement the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Soil Vapor Sample Results near Office Building**. Two soil vapor samples collected in the area of the office building contained vinyl chloride at concentrations that exceeded the screening level for potential vapor intrusion under a commercial land use scenario (SG-12 and SG-16). One soil vapor sample (SG-5) collected previously in the area of the office building contained benzene at a concentration that exceeded the screening level for potential vapor intrusion under a commercial land use scenario. We concur with the recommendation

to conduct additional soil vapor sampling in the area of the former office building. Please present plans for soil vapor sampling in the Soil Vapor Sampling Work Plan requested below.

2. **Chlorinated VOC Plume and Former Solvent Tank**. A plume of chlorinated VOCs extends approximately 500 feet northwest from the Former 8,000-gallon mineral spirits/1,1,1-TCA UST (solvent tank). VOCs detected in the plume include 1,1,1-TCA and breakdown products, 1,1-dichloroethane (DCA), 1,1-dichloroethene (DCE), and vinyl chloride. The highest concentrations of chlorinated VOCs have been detected in groundwater samples from monitoring well MW-8, which is located approximately 350 feet downgradient from the former solvent tank. 1,1,1-TCA has been detected in groundwater at a maximum concentration of 2,700 micrograms per liter (µg/L). Although 1,1,1-TCA appears to be breaking down to 1,1-DCA, 1,1-DCE, and vinyl chloride, further breakdown to ethene may be limited under current conditions within the aquifer. As noted in the discussion of geochemical data and natural attenuation parameters, methane was detected in eight of nine groundwater samples at concentrations greater than 1 mg/L, which could promote the accumulation of vinyl chloride. Nutrient addition may be necessary to completely reduce vinyl chloride to ethene. Based on the apparent recalcitrance of the chlorinated VOCs to further breakdown and the potential for accumulation of vinyl chloride, remediation of chlorinated VOCs is required for the site. We request that you submit a Work Plan for pilot testing of potential remedial technologies.

3. **Former Fuel Dispenser Islands and Three 10,000-Gallon USTs**. A plume of groundwater containing TPH as gasoline extends approximately 550 feet northwest of the former fuel dispenser islands and three 10,000-gallon USTs. Groundwater containing benzene extends approximately 250 feet west of the former fuel dispenser islands and three 10,000-gallon USTs. Five soil brings have been advanced in the immediate area of the former fuel dispenser islands and USTs. TPH as gasoline and diesel were detected in soil at concentrations up to 1,400 and 2,700 milligrams per kilogram, respectively. The highest concentrations of TPH as gasoline were detected in soil samples collected 15 and 20 feet bgs and the highest concentration of TPH as diesel was detected in a soil sample collected 5 feet bgs. TPH as gasoline and diesel have been detected in groundwater samples collected downgradient from the former dispenser islands and three 10,000-gallon USTs at concentrations up to 19,000 and 37,000 µg/L, respectively. In addition, TPH as gasoline was detected at a concentration of 190 µg/L in a grab groundwater sample collected in the area of the water supply well. The former dispensers and USTs were reportedly removed in 1982 or 1983. Therefore, the fuel release apparently occurred more than 26 years ago. Based on the extent of the TPH plume, the elevated concentrations of TPH remaining in groundwater, and concentrations of residual fuel hydrocarbons in soil, a significant mass of fuel hydrocarbons likely remains at the site. If a significant mass of residual fuel hydrocarbons was not present, the TPH plume would be expected to be less extensive and the concentrations of fuel hydrocarbons in soil and groundwater would be expected to be significantly lower. The mass of residual fuel hydrocarbons below the water table constitutes an ongoing source of groundwater contamination. Due to the presence of an ongoing source of groundwater contamination, the area of the former fuel dispensers and three 10,000-gallon USTs 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." Therefore, we request that you implement cleanup to reduce the

mass of residual fuel hydrocarbons in the source area. Please submit a pilot test Work Plan or Draft Corrective Action Plan for the Former Fuel Dispensers and Three 10,000-Gallon UST Area.

4. **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:

- **January 9, 2009** – Soil Vapor Sampling Work Plan
- **February 10, 2009** – Pilot Test Work Plan for Former 8,000-gallon Mineral Spirits/1,1,1-TCA UST Area
- **February 10, 2009** – Pilot Test Work Plan or Draft Corrective Action Plan for Former Fuel Dispensers and Three 10,000-gallon USTs Area
- **February 25, 2009** – Groundwater Monitoring Report for Fourth Quarter 2008
- **April 24, 2009** – Groundwater Monitoring Report for First Quarter 2009
- **July 24, 2009** – Groundwater Monitoring Report for Second Quarter 2009

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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to 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 Instructions." 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. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all 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 monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, these same reporting

requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is 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, 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)