

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



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March 26, 2009

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 – Work Plan Approval

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 documents entitled, "*Work Plan for Enhanced Anaerobic Biodegradation Pilot Study - Parking Lot Area and Former 8,000-Gallon Mineral Spirits/1,1,1-TCA UST*," dated March 12, 2009, "*Work Plan for Enhanced Aerobic Biodegradation Pilot Study – Former Three 10,000-gallon USTs Area*," dated March 12, 2009, and "*Quarterly Groundwater Monitoring and Sampling Report, Third and Fourth Quarter 2008*," dated January 13, 2009. All three reports were prepared on your behalf by The Source Group, Inc.

The proposed scope of work in the "*Work Plan for Enhanced Anaerobic Biodegradation Pilot Study - Parking Lot Area and Former 8,000-Gallon Mineral Spirits/1,1,1-TCA UST*," dated March 12, 2009 is generally acceptable and may be implemented as proposed. However, it should be noted that no treatability tests that included either microcosm or column tests to evaluate the specific biodegradation mechanisms have been conducted prior to implementation of the proposed enhanced anaerobic biodegradation pilot study. Therefore, there is some uncertainty regarding the ability of enhanced anaerobic biodegradation to degrade all chlorinated solvents and daughter products at the site. The groundwater monitoring results from the pilot study will be reviewed to assess the effectiveness of the proposed injections.

The proposed scope of work in the "*Work Plan for Enhanced Aerobic Biodegradation Pilot Study – Former Three 10,000-gallon USTs Area*," dated March 12, 2009 may be implemented. However, as discussed in technical comment 4 below, the potential for the selected alternative for the pilot study (injection of an oxygen-releasing compound) to be successful at the site is questionable. Results from the proposed pilot study must clearly indicate that injection of an oxygen-releasing compound is capable of treating the significant mass of residual contamination remaining in the UST area before proceeding with additional pilot testing or implementation of the selected remedial alternative at the full scale.

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

TECHNICAL COMMENTS FOR PROPOSED ANAEROBIC BIODEGRADATION PILOT STUDY

1. **Proposed Cleanup Goals.** The proposed short-term cleanup goal for vinyl chloride of 13 micrograms per liter, which is based on the vapor intrusion to indoor air pathway, is acceptable. For vinyl chloride, consideration of the vapor intrusion pathway results in the most conservative (lowest) short-term cleanup goal in comparison to other exposure pathways. For all chemicals except vinyl chloride, we defer comment or approval of the proposed short-term cleanup goals at this time. All of the proposed cleanup goals are based upon the vapor intrusion to indoor air pathway under a commercial land use. It is not clear that vapor intrusion to indoor air is the only applicable pathway to be considered for the site. Long-term cleanup goals are to be developed following completion of the proposed pilot study.
2. **Groundwater Monitoring.** The proposed groundwater monitoring is generally acceptable. However, it should be noted that evaluation of the effectiveness of the enhanced anaerobic biodegradation pilot study will depend almost exclusively upon results from well MW-8. Depending upon the initial results from well MW-8, additional monitoring may be necessary to evaluate the effectiveness of the proposed remedial method.

TECHNICAL COMMENTS FOR PROPOSED AEROBIC BIODEGRADATION PILOT STUDY

3. **Proposed Cleanup Goals.** We defer comment or approval of the proposed short-term cleanup goals in the Aerobic Biodegradation Pilot Study Work Plan at this time. All of the proposed cleanup goals are based upon the vapor intrusion to indoor air pathway. It is not clear that the vapor intrusion to indoor air pathway is the only criteria to be considered for the site. Long-term cleanup goals are to be developed following completion of the proposed pilot study.
4. **Selected Remedial Technology.** The selected remedial alternative for a pilot study in the UST area is enhanced aerobic biodegradation through injection of an oxygen-releasing compound at 15 direct-push points. Based on the estimated mass of residual contamination in the UST area and the limitations of an oxygen-releasing compound to treat a large contaminant mass, the potential for the selected remedial alternative to be successful is questionable. Results from the proposed pilot study must clearly indicate that injection of an oxygen-releasing compound is capable of treating the significant mass of residual contamination remaining in the UST area before proceeding with additional pilot testing or implementation of the selected remedial alternative at the full scale.
5. **Groundwater Monitoring.** The proposed groundwater monitoring is generally acceptable. However, it should be noted that evaluation of the effectiveness of the enhanced aerobic biodegradation pilot study depends almost exclusively upon results from well MW-9. Depending upon the initial results of the pilot study, additional monitoring may be necessary to evaluate the effectiveness of the proposed remedial method.

TECHNICAL REPORT REQUEST

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

- **April 6, 2009** – Soil Vapor Sampling Report
- **August 7, 2009** – Pilot Study Report and Groundwater 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

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

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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

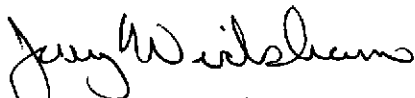
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032

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: March 27, 2009
	PREVIOUS REVISIONS: December 16, 2005, October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

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 My Le Huynh.
 - 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 @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) If site is a new case without an RO# use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification e-mail indicating that your document has been successfully uploaded to the ftp site.