

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION  
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May 9, 2008

Mr. John Lilla  
PACO Pumps, Inc.  
800 Koomey Road  
Brookshire, TX 77423

Mr. Harold Vignoles  
9201 San Leandro LLC  
9201 San Leandro Street  
Oakland, CA 94603

Mr. Dallas Nelson  
GP Holdings LLC  
5977 Keith Avenue  
Oakland, CA 94618-1545

Subject: Fuel Leak Case No. RO0000320 and Geotracker Global ID T0600101592, PACO Pumps Inc, 9201 San Leandro Street, Oakland, CA 94603

Dear Mr. Lilla, Mr. Vignoles, and Mr. Nelson:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted document entitled, "*Workplan for Former Paco Pumps Facility, 9201 San Leandro Street, Oakland, California,*" dated March 17, 2008. The March 17, 2008 Work Plan, which was prepared on your behalf by ERAS Environmental, Inc., was revised in response to technical comments in ACEH correspondence dated January 31, 2008. The Work Plan provides more detailed maps of proposed sampling locations. However, the Work Plan does not adequately address several of the technical comments. Therefore, we request that you prepare a Revised Work Plan **by July 18, 2008** that addresses the technical comments below.

**REQUEST FOR INFORMATION**

We previously requested that you submit copies of the following reports, which are referenced in other technical reports for the site but are not in the ACEH case file. The Work Plan indicates that ERAS Environmental, Inc. is not authorized to contact PACO Pumps to retrieve the documents requested in our January 31, 2008 correspondence. This correspondence is directed to all responsible parties. All responsible parties are required to cooperate and respond to these requests. Therefore, we request that the responsible party with access to the documents listed below submit the requested documents by July 18, 2008. In addition, please submit any other technical reports presenting the results of environmental investigations or cleanup that were not previously submitted to ACEH.

- Cutliffe, S., 1987. Findings and Results of the Cleanup Project Performed on 14 and 15 December 1987 at PACO Oakland Site.
- Dames & Moore, 1987. Site Contamination Study – PACO Pumps Facility, Oakland, for Amsted Industries.

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- Ecology and Environment Inc., 1985. CERCLA Site Inspection, PACO Pumps 845 92<sup>nd</sup> Avenue, Oakland, CA. Site ERRIS #CAD 088772629, Inspection ID# C(85)C371, Date of Inspection 9/17/85, Report Due November 8, 1985.
- Jonas & Associates, Inc., 1991. Soil Characterization Report Stained Asphalt/Concrete Area – PACO Pumps, 9201 San Leandro Street, Oakland, CA, October 30, 1991.
- Van Aken, B., 1987. Internal PACO Correspondence to Mr. John G. Terranova regarding excavation, November 4, 1987.

### **TECHNICAL COMMENTS**

1. **Piping Associated with Former 550-Gallon UST.** Our August 21, 2007 technical comments requested that you determine whether UST system piping encountered during the 1992 UST excavation remains in place beneath the adjacent building or extends to a dispenser in another location. Utility location using magnetic and ground penetrating radar methods was previously proposed within the former UST area. The March 17, 2008 Work Plan does not propose utility locations and instead proposes hand digging at the building foundation to locate the pipe prior to additional investigation. We have no objection to locating the pipe prior to conducting additional investigation to assess whether piping remains in place beneath the adjacent building or extended to a dispenser in another location.
2. **Maps Showing Proposed Sampling Locations.** The March 17, 2008 Work Plan includes several detailed maps, which are improvements from the previous Work Plan. We appreciate the generally improved and more accurate presentation of proposed sampling locations.
3. **Groundwater Characterization for Former 550-Gallon UST Area.** The March 17, 2008 Work Plan proposes a total of six soil borings for characterization of the extent of groundwater contamination from the former 550-gallon UST. Three soil borings are proposed within approximately 20 feet of the former UST, one soil boring approximately 125 feet southwest of the former UST, and two soil borings more than 200 feet northwest of the former 550-gallon UST. One additional soil boring is proposed approximately 125 feet northwest of the former 550-gallon UST, apparently to investigate the second UST. In the Revised Work Plan requested below, please review the potential to move the two proposed borings along the northwest property boundary closer to the former 550-gallon UST. Moving the borings approximately 120 feet to the southeast inside the Warehouse Storage Area would provide a transect of three borings including the proposed boring southeast of the Office shown on Figure 3.
4. **Vertical Delineation.** The March 17, 2008 Work Plan proposes the collection of a grab groundwater sample from first encountered groundwater and a second groundwater sample from each boring at a depth of 15 to 19 feet bgs. In order to characterize the subsurface stratigraphy and select intervals for depth-discrete groundwater sampling, we request that you extend one of the three proposed soil borings in the area of the former 550-gallon UST and each of the three borings downgradient of crossgradient from the 550-gallon UST to a depth of 40 feet bgs. Coarse-grained zones that may act as migration pathways are to be

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targeted for grab groundwater sampling. Please include plans in the Revised Work Plan requested below to extend the soil borings to 40 feet bgs and to select subsurface zones for depth-discrete groundwater sampling based on encountered conditions.

5. **Proposed Groundwater Analyses.** Analysis for MTBE using EPA Method 8015/8021 is not acceptable. In the Revised Work Plan requested below, please include analyses for MTBE, TAME, DIPE, ETBE, TBA, 1,2-dichloroethane, and ethylene dibromide using EPA Method 8260B. We also request that soil samples be analyzed for lead.
6. **Soil Vapor Sampling.** Due to the elevated concentrations of benzene detected in previous soil gas samples, our January 31, 2008 correspondence indicated that the proposed scope of soil vapor sampling must be expanded. No changes were made to the proposed scope of soil vapor sampling in the March 17, 2008 Work Plan. The March 17, 2008 Work Plan proposes collection of one sub-slab vapor sample within the building and one soil vapor sample outside the building. Table 4 – Historical Analytical Results – Soil Gas Samples contains an error, which makes it appear that the detected concentrations of benzene in soil gas do not exceed screening levels. The correct Environmental Screening Level (ESL) for benzene in soil gas for residential land use is 84 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) and for commercial land use is 280  $\mu\text{g}/\text{m}^3$ . Table 4 shows units in milligrams per cubic meter ( $\text{mg}/\text{m}^3$ ). Therefore, the correct ESLs are three orders of magnitude lower than those shown on Table 4. The concentration of benzene detected in soil vapor samples B-5 and B-6 inside the building are more than 300 times higher than the commercial ESL for benzene in soil gas. The scope of the proposed soil vapor sampling investigation is inadequate to characterize the extent of the elevated concentrations of benzene in soil vapor and must be expanded in the Revised Work Plan requested below.
7. **Proposed Soil Vapor Analyses.** Please review the proposed soil vapor analyses on page 6, specifically whether TPHg will be analyzed by Method TO-15.
8. **Detailed Map of Former UST Excavation & Proposed Sampling (Figure 4).** Figure 4 shows several rooms west of the Former UST Excavation labeled, "Storage." Thank you for including a more detailed map. In the Revised Work Plan requested below, please expand the detailed depiction of building walls and uses to include the area north of the Former UST Excavation. In addition, please include a more detailed description of the occupancy of the adjacent areas to the Former UST Excavation.
9. **Proposed Utility Survey for UST in Area of Well 9MW4.** A geophysical survey was previously proposed in the area of well 9MW4 to locate a suspected UST. The March 17, 2008 Work Plan indicates that ground penetrating radar and other geophysical methods are not feasible due to steel reinforcing in the floor and steel racks. Soil and groundwater sampling from three borings located around the perimeters of the building are proposed in lieu of the geophysical survey. In the Revised Work Plan requested below, please describe the rationale for locating three borings around the perimeter of the warehouse building. In addition, please confirm that the use of ground penetrating radar is not feasible.

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10. **Soil Removal Along Railroad Tracks.** We request that soil samples be collected from all intervals where staining, odor, or elevated PID readings are observed. If no evidence of contamination is observed, we request that soil samples be collected from 1.5 and 3.0 feet bgs. We concur with the proposal to extend the borings to a depth of 5 feet bgs and collect a soil sample from 5 feet bgs if contamination is observed at 3 feet bgs. Please include these modifications in the Revised Work Plan requested below.
11. **PCBs in Soil.** PCBs were detected in surface soil samples from two of the three sampling locations in the area of well MW-1. In the Revised Work Plan requested below, please include soil samples at depths shallower than 3 to 4 feet.
12. **Elevated Concentrations of TPH as Kerosene and TPH as Motor Oil Detected in Boring B18.** We request that you include one additional sampling location between B-18 and B-17 in order to evaluate whether contamination detected in the two borings is contiguous. Please include this modification in the Revised Work Plan requested below.

#### TECHNICAL REPORT REQUEST

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

- **July 18, 2008** – Revised Work Plan

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](http://www.swrcb.ca.gov/ust/cleanup/electronic%20reporting)).

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#### 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](mailto: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

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

Gail Jones, ERAS Environmental, 1533 B Street, Hayward, CA 94541

Stacie Boothe, Gibson, Dunn, & Crutcher, LLP, 1050 Connecticut Avenue, N.W.,  
Washington, D.C. 20036-5306

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](mailto: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](mailto: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](mailto: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)