

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
ALEX BRISCOE, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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August 26, 2014

Mr. David E. Murray
PCC Flow Technologies Holdings, Inc.
4600 SE Harney Drive
Portland, OR 97206-0898
(sent via electronic mail to:
DMurray@pccstructurals.com)

Mr. Harold Mark Vignoles
9201 San Leandro LLC
9201 San Leandro Street
Oakland, CA 94603
(sent via electronic mail to: mark@servicewest.com)

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

Mr. David Murray
PCC Precision Castparts Corp.
4650 SW Macadam Avenue, #400
Portland, OR 97239
(sent via electronic mail to: DMurray@pccstructurals.com)

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

Dear Messrs. Murray, Vignoles, and Nelson:

Alameda County Environmental Health (ACEH) has reviewed the case file, including the June 18, 2014 *Data Gaps Investigation Work Plan*. The report was prepared and submitted on your behalf by The Source Group (SGI) of Signal Hill, California. Thank you for submitting the work plan.

ACEH has previously evaluated the data and recommendations presented in the above-mentioned report, in conjunction with the case files, to determine if the site is eligible for closure as a low risk site under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on ACEH staff review, we have determined that the site fails to meet the LTCP General Criteria b (consists only of petroleum), d (Free Product), e (Site Conceptual Model), f (Secondary Source Removal), and the Media-Specific Criteria for Groundwater, the Media-Specific Criteria for Vapor Intrusion to Indoor Air, and the Media-Specific Criteria for Direct Contact (see Geotracker for an updated copy of the LTCP checklist).

The work plan was submitted in followup to the previous directive letter dated March 7, 2014, and a meeting at the site on April 22, 2014 that helped focus work required at the site. As generally discussed in the meeting, it is the judgment of ACEH that it may be possible to use land use restrictions to manage documented contamination at the subject site; however, please be aware that each of the LTCP data gaps identified in the March 7, 2014 letter require addressing and resolution prior to case closure. ACEH presumes that each data gap identified will be addressed in the proposed subsurface investigation report; however, please be aware that each item discussed in the referenced directive letter requires a response within the LTCP context.

Based on ACEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Work Plan Clarifications and Modifications** – The referenced work plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH seeks to reaffirm a specific proposed action due to the implementation of the LTCP. Otherwise, please submit a report by the date specified below.
 - a. **PCB Investigation** – Two shallow soil bores are proposed for installation in the vicinity of wells MW-10 and MW-11 due to the detection of extractable-ranged hydrocarbons in soil samples collected at a depth of 2.5 feet below grade surface (bgs) in both of these soil bores. The work plan proposes to submit soil samples for analysis at a depth of 1.0 feet bgs, and to hold samples proposed to be collected at 2.5 and 5 feet bgs. ACEH additionally requests that soil samples from the 2.5 foot depth also be analyzed in order to target soil documented (or anticipated) to contain elevated extractable-ranged hydrocarbons over a reasonably large portion of the area adjacent to the western rail line (area presumed to be between MW-10 and MW-11), or at a minimum, to be in proximity to impacted soil.
 - b. **Western Boundary Surface Soil Staining** – The work plan also proposes to collect representative soil samples from surficial staining at the southwestern portion of the subject site and analyze the soil samples for extractable-ranged hydrocarbons. Because the staining appeared to be motor oil related, ACEH additionally requests that the samples also be analyzed for the five wear metals. ACEH anticipates that other standard waste oil constituents, such as chlorinated organic compounds and benzene, toluene, ethylbenzene, and total xylenes (BTEX) compounds are not a significant concern due to the sun-washed environment of this corner of the site.
 - c. **Soil Sample Selection Protocols** – The work plan proposes to install one groundwater monitoring well in the southwestern portion of the site to define a downgradient direction. The work plan proposes to collect and retain for laboratory analysis one to three soil samples. ACEH requests that soil samples be analyzed at significant lithology changes, photoionization detections, and other signs of contamination such as staining or discoloration.
 - d. **Groundwater Sampling Matrix** – The referenced work plan included a groundwater monitoring matrix (Table 1) proposed for two groundwater monitoring and sampling events. ACEH has reviewed the matrix, is in general agreement with the matrix; however, requests additional sampling at five wells in order to understand changes in groundwater concentrations at these locations since the pilot test work, and also to eliminate potential confusion caused by older non-representative groundwater data. Specifically, ACEH additionally requests the collection of all analytes (Volatile Organic Compounds [VOCs] and Total Petroleum Hydrocarbons [TPH] as gas by EPA 8260, and TPH diesel and TPH motor oil by EPA 8015) at wells E-5, E-9, E-10, and E-11, and TPHd and TPH motor oil at well MW-7. This is expected to clarify residual groundwater contamination beneath Area 4 at the site.
 - e. **Silica Gel Cleanup** – The work plan proposes to use silica gel cleanup (SGC) on extractable-ranged analytical testing in groundwater. ACEH requests that all soil and groundwater samples analyzed for extractable-ranged hydrocarbons be analyzed with SGC.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Barbara Jakub), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **May 16, 2014** – Semi-Annual Groundwater Monitoring Report (Overdue)
(File to be named: RO320_GWM_R_yyyy-mm-dd)

- **November 7, 2014** – Site Investigation Report and updated SCM
(File to be named: RO320_SWI_R_yyyy-mm-dd)
- **November 7, 2014** – Semi-Annual Groundwater Monitoring Report (can be combined with site investigation report; File to be named: RO320_SWI_QWM _R_yyyy-mm-dd)

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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

If you have any questions, please call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations
Electronic Report Upload (ftp) Instructions

cc: Paul Parmentier, The Source Group, 1962 Freeman Avenue, Signal Hill, CA 90755
(sent via electronic mail to pparmentier@thesourcegroup.net)

Paisha Jorgensen, The Source Group, 1962 Freeman Avenue, Signal Hill, CA 90755
(sent via electronic mail to pjorgensen@thesourcegroup.net)

Rob Bilotti, Service West, Inc; 9201 San Leandro Street, Oakland, CA 94603
(sent via electronic mail to: Rob@servicewest.com)

Marc Zeppetello, Barg Coffin Lewis & Trapp, LLP, 350 California Street, 22nd Floor, San Francisco, CA 94104-1435; (sent via electronic mail to MAZ@bcltlaw.com)

Scott Kaplan, Stoel Rives, LLP, 900 S.W. Fifth Avenue, Suite 2600, Portland, OR, 97204
(sent via electronic mail to SJKaplan@stoel.com)

Leroy Griffin, Oakland Fire Department 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (sent via electronic mail to lgriffin@oaklandnet.com)

Dilan Roe, ACEH (sent via electronic to: dilan.roe@acgov.org)

Mark Detterman, ACEH (sent via electronic mail to mark.detterman@acgov.org)
Electronic File, GeoTracker

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

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.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
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

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- 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)

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 deh.loptoxic@acgov.org
 - 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, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - 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 deh.loptoxic@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 by email indicating that your document was successfully uploaded to the ftp site.