

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**  
AGENCY

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH  
LOCAL OVERSIGHT PROGRAM (LOP)  
For Hazardous Materials Releases  
1131 HARBOR BAY PARKWAY  
ALAMEDA, CA 94502  
(510) 567-6700  
FAX (510) 337-9335

September 27, 2017

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

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

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

Mr. Peter Serrurier  
PCC Precision Castparts Corp.  
4650 SW Macadam Avenue, #400  
Portland, OR 97239  
(Sent via electronic mail to:  
[pserrurier@precasetcorp.com](mailto:pserrurier@precasetcorp.com))

Subject: Request for Work Plan Addendum; 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 Department of Environmental Health (ACDEH) has reviewed the case file, including the *First Quarter 2017 Groundwater Monitoring Report*, dated May 5, 2017, and the brief work plan outline contained in the *Former Paco Pumps Site*, dated July 25, 2017. The reports were prepared and submitted on your behalf by APEX / The Source Group (APEX). Thank you for submitting the report and correspondence.

The referenced work plan outline provided an overview of proposed tasks associated with each Area of Interest, and in general ACDEH is in agreement with the generalized scope of work; however, requests additional details to eliminate ambiguity and to incorporate potential changes in Standard Operating Procedures (SOPs) which are likely given the length of time since similar data collection has occurred at the site, changes in regulatory guidance, and potential changes in SOPs due to the merger between APEX and The Source Group.

Therefore, based on the review of the case file and the referenced reports, ACDEH requests that you address the following technical comments and send us the documents requested below.

### **TECHNICAL COMMENTS**

**1. Work Plan Clarifications and Modifications** – The referenced work plan proposes a series of actions with which ACDEH is in general agreement of undertaking; however, ACDEH seeks to eliminate potential miscommunication, and requests clarification of the following items. The following organization is consistent with the work plan outline organization.

**a. Area of Interest 5 – Vicinity of Well MW-4:**

- i. Soil Vapor Probes** – Resampling of SV-6, SV-7, and SV-8 have been proposed. Please forward SOPs for soil vapor sampling, ensuring they are consistent with Department of Toxic Substances Control (DTSC) guidance. ACDEH additionally requests confirmation of the analytes and analytical methods proposed for the vapor samples.
- ii. Indoor Air** – Two indoor air samples have been proposed. Please forward SOPs for indoor air sampling consistent with DTSC guidance. ACDEH will additionally request the collection

of an ambient outdoor air sample for comparison purposes, and the collection of concurrent sub-slab vapor samples in order to determine the attenuation factor of the concrete slab. Therefore, please forward SOPs for the collection of an ambient outdoor air sample and installation and sampling of sub-slab vapor samples, consistent with DTSC guidance. Please additionally, provide a figure locating the locations of sub-slab vapor samples and the ambient outdoor air sample. Please be cognizant of DTSC guidance for the location of outdoor air samples. ACDEH additionally requests confirmation of the analytes and analytical methods proposed for the vapor samples.

- iii. **Grab Groundwater Samples** – Three grab groundwater samples were proposed to be collected in a north-south transect between MW-4 and the western edge of western building. Please provided a figure locating the proposed bores. Please provided SOPs for the sampling of grab groundwater and bore abandonment. ACDEH additionally requests confirmation of the analytes and analytical methods proposed for the vapor samples.

**b. Area of Interest 4; Vicinity of Well MW-3:**

- i. **Geophysical Survey and Potholing** – Please document the results and report generated for this activity which did not locate an additional underground storage tank (UST). Please additionally document the findings of the potholing conducted in February 2017 (confirmation samples, photographs, locations, etc.).
- ii. **Wells MW-3 and E-8** – Replacement of these wells appears reasonable. Please provide SOPs for well installation.
- iii. **Indoor Air Testing** – Indoor air was proposed to be sampled at two locations in the western building at the site. Please provide a figure providing the location of the proposed sample points, as well as an ambient outdoor air sample. Due to the very open nature of this building it does not appear that subslab vapor points are necessary to document subslab vapor concentrations or determine a slab attenuation factor.
- iv. **Additional Groundwater Monitoring Well** – Please provide a figure to depict the proposed location of downgradient well MW-13.

**c. Area of Interest 4 – Southern End of Western Building:**

- i. **Remaining Secondary Source** – Please be aware that with the apparently remaining motor oil secondary source, the site will fail to meet the Low Threat Closure Policy (LTCP). The addition of a geophysical survey to locate a potential UST or UST cavity, with the subsequent investigation and removal of the secondary source to the extent practicable, will likely be required in order for the site to proceed to closure under the LTCP.

**d. Area of Interest 2 – PCB Soil Contamination:**

- i. **Bore Locations** – Please provide a figure depicting locations of the six proposed soil bores. Please describe the number of samples to be collected and the intervals to be sampled, or the method to be used to determine the sampling intervals.

**e. Area of Interest 2 – Wells MW-9 and MW-12:**

- i. **Groundwater Well MW-13** – Please provide a figure depicting the location of the proposed well.

- 2. **Groundwater Monitoring** – Please continue semi-annual groundwater monitoring at the site. Plume stability has not been demonstrated at the site. Please sample all wells during the next monitoring event and submit a sampling plan for future monitoring events. Silica Gel Cleanup (SGC) can be eliminated from the analytical suite. Please submit groundwater monitoring reports by the dates identified below.

### **TECHNICAL REPORT REQUEST**

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

- **November 3, 2017** – Work Plan Addendum  
(File to be named: RO320\_WP\_ADEND\_R\_yyyy-mm-dd)
- **November 20, 2017** – Second 2017 Semi-Annual Groundwater Monitoring Report  
File to be named: RO320\_GWM\_R\_yyyy-mm-dd
- **June 1, 2018** – First 2018 Semi-Annual Groundwater Monitoring Report  
File to be named: RO320\_GWM\_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](mailto: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: Jake Wilcox, Apex Companies, LLC, 3478 Buskirk Avenue, Pleasant Hill, CA 94523  
(Sent via electronic mail to: [Jacob.Wilcox@apexcos.com](mailto:Jacob.Wilcox@apexcos.com))

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

Marc Zeppetello, Barg Coffin Lewis & Trapp, LLP, 350 California Street, 22<sup>nd</sup> Floor, San Francisco, CA 94104-1435; (Sent via electronic mail to: [MAZ@bcltlaw.com](mailto: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](mailto:SJKaplan@stoel.com))

Dilan Roe, ACDEH; (Sent via electronic mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))  
Paresh Khatri, ACDEH; (Sent via electronic mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org))  
Mark Detterman, ACDEH; (Sent via electronic mail to: [mark.detterman@acgov.org](mailto: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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) 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 File Transfer Protocol (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 SCP 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 ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)) for more information on these requirements.

#### ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the SWRCB's GeoTracker website." 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 6731, 6735, and 7835) 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 licensed 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 case meet this requirement. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

#### UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, late 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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> December 1, 2016
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions


The Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) 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](mailto: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) Open File Explorer using the Windows  key + E keyboard shortcut.
    - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
  - b) On the address bar, type in ftp://alcoftp1.acgov.org.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
  - d) Click Log On.
  - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - f) 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](mailto: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.