

Wickham, Jerry, Env. Health

To: Peter Krasnoff
Cc: Jack Schultz
Subject: RE: Revised-Revised Site Investigation Work Plan

Peter:

Your message raises several issues which I will itemize and respond to:

1) Appeals process. An appeal of the ACEH directive letter must be made in writing by the responsible party to the LOP and SLIC Program Manager, Ms. Donna Drogos. Please submit your written appeal via the ACEH ftp site to Ms. Donna Drogos, Alameda County Environmental Health, 1131 Harbor Bay Parkway, Alameda, CA 94502. Please note that the appeal must come from the responsible party and not the consultant.

2) Meeting at Site. It is not clear whether you requesting a meeting to discuss an appeal of the December 20, 2007 ACEH directive, previous technical issues raised (as discussed in second paragraph below), or to discuss physical limitation of sampling locations. Please clarify the issues that you wish to discuss and the reason the meeting is to be held at the site rather than ACEH offices. Given the highly argumentative nature of previous correspondence and submittals from WEST Environmental Services & Technology, we simply would like some indication of the stated purpose of the meeting. Let me clarify that we are not refusing to meet with you and hope that you do not use our request for information to make further contentions that ACEH will not agree to meet. Please provide your agenda with dates and times that you can meet between March 11 and 13 or March 18 through 20.

3) Expediting the Review Process. Your request to expedite the process would be more convincing if you did not wait until February 25 to indicate that you do not intend to comply with a December 20 directive.

Regards,
Jerry Wickham
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 fax
jerry.wickham@acgov.org

-----Original Message-----

From: Peter Krasnoff [mailto:peterk@westenvironmental.com]
Sent: Monday, February 25, 2008 12:57 PM
To: Wickham, Jerry, Env. Health
Cc: Jack Schultz
Subject: Revised-Revised Site Investigation Work Plan

Jerry:

As a follow-up to my voice mail of earlier today, we are requesting a meeting at the Site and/or some appeal of the current Alameda County Environmental Health (ACEH) directive of December 20, 2007. We understand that Pacific Galvanizing was required to submit either a revised Revised Site Investigation Work Plan or provide notification of intent to implement site investigation in accordance with the ACEH requirements.

After careful review and extensive evaluations, we are unclear how to revise the Revised Site Investigation Work Plan. We believe that the current work plan adequately addresses the regulatory requirements and would like to proceed to implement it. We do not concur and/or understand the technical conclusions presented by ACEH that are the apparent bases

for the requirements to revise the work plan, e.g., dissolved versus total metals, application of CHHSLs or Designated Level Methodology. Therefore, we are not recommending to Pacific Galvanizing to proceed with the work plan as stipulated.

Therefore, with the goal of expediting the review process, we believe that a meeting at the Site would help clarify issues and aid in refining the proposed scope of the investigation. Please advise your availability for a meeting with Mr. Jack Schultz of Pacific Galvanizing during the week of March 3, 2008. We believe that a meeting at the Site would aid in our explaining the technical limitations of many of the required sampling locations.

Thank you,

Peter

--
Peter M. Krasnoff, P.E.
WEST, Inc.
711 Grand Avenue, Suite 220
San Rafael, CA 94901
Direct: (415) 485-1660
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=====

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



F

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

December 20, 2007

Mr. Jack Schultz
Pacific Galvanizing
715 46th Avenue
Oakland, CA 94601

Cane Properties
c/o Branagh Inc.
750 Kelvin Ct.
Oakland, CA 94621-4040

Mr. Rory MacNeil
Alameda County Real Estate
399 Elmhurst Street
Hayward, CA 94544-1395

Subject: SLIC Case RO0002477 and Geotracker Global ID T06019782176, Pacific Galvanizing, 715 46th Avenue, Oakland, CA 94601

Dear Mr. Schultz and Mr. MacNeil:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above referenced site including the recently submitted work plan entitled, "Revised Site Investigation Work Plan, SLIC Case RO0002477, Pacific Galvanizing, 715 46th Avenue, Oakland, California," prepared by WEST Environmental Services & Technology (WEST) and dated November 2007 (*Revised Work Plan* received by ACEH on November 28, 2007). The Work Plan was revised in response to six technical comments in ACEH correspondence dated September 13, 2007. We also received correspondence dated November 26, 2007 from WEST to Mr. Jack Schultz entitled, "Alameda County Environmental Health's Comments on Site Investigation Work Plan, 715 46th Avenue, Oakland, California, SLIC Case RO0002477."

In our September 13, 2007 correspondence, we requested that a document entitled, "Site Investigation Work Plan, SLIC Case RO0002477, Pacific Galvanizing, 715 46th Avenue, Oakland, California," dated August 2007 be revised to include three additional soil borings, one additional monitoring well, and we requested that groundwater samples not be filtered. The November 26, 2007 WEST correspondence finds areas of disagreement with four of the six ACEH technical comments on the *Work Plan*. As a result, the November 2007 *Revised Work Plan* incorporates only the additional soil borings with modifications to the sampling requested by ACEH and argues against conducting the additional work requested by ACEH. In addition, the November 26, 2007 WEST correspondence presents arguments on issues outside the proposed work.

We do not wish to delay work on this site but given the nature of the arguments made in the November 26, 2007 WEST correspondence, we are compelled to respond. Therefore, we offer two options. You may: 1) conduct the site investigation with conditional approval provided that all of the additional tasks outlined in technical comment 2 below are incorporated without further changes; or 2) submit a Revised Work Plan if you are proposing an alternate scope of work or do not concur with the items requested in technical comment 2.

Mr. Jack Schultz
Mr. Rory MacNeil
RO0002477
December 20, 2007
Page 2

If you wish to meet with ACEH to discuss these comments, we are more than happy to do so. Please see technical comment 1 below which corrects an inaccurate statement made in the November 26, 2007 WEST correspondence regarding ACEH willingness to meet.

TECHNICAL COMMENTS

1. **Request for Meeting.** The November 26, 2007 WEST correspondence indicates that ACEH would not agree to have a meeting. This is not an accurate statement. In an e-mail message from Jerry Wickham of ACEH to Peter Krasnoff of WEST on October 3, 2007, we indicated that our comments seemed clear for revising the work plan and requested that Mr. Krasnoff provide an agenda and identify the issues that require clarification prior to scheduling a meeting. Mr. Krasnoff did not respond with an agenda or identify issues requiring clarification. We simply would like to know what issues are to be discussed prior to arranging a meeting.

2. **Conditional Approval of Proposed Scope of Work.** The proposed site investigation described in the Revised Work Plan may be implemented as the next phase of investigation provided that the following items are incorporated during the field investigation:
 - Collect and analyze soil samples from soil borings SB-14 through SB-16 as requested in technical comment 4.
 - Install and sample well W-4 as requested in technical comment 5.
 - Install and sample well W-3 as requested in technical comment 6.
 - Collect soil samples from well borings W-3 and W-4 as requested in comment 7.
 - Measure total and dissolved metals in groundwater samples as requested in comment 9.

If you choose to modify or not implement any of the above requests, please submit a Revised Work Plan by February 25, 2008.

3. **Lateral and Vertical Extent of Contamination.** WEST's response to our request for three additional soil borings is that additional soil sampling is not required because, "an analysis presented in the Site Investigation Report showed that the extent of lead and zinc in soil above applicable screening criteria has been delineated." The "analysis" apparently refers to a comparison of site data to California Human Health Screening Levels (CHHSLs) for commercial/industrial land use. Soil sampling to date has been limited to collection of soil samples from a depth of approximately 5 feet bgs in the alley. We do not agree that the collection of soil samples from a single depth interval provides vertical delineation of contamination. Adequate site characterization involves the collection of soil samples from more than one depth. We also do not agree with the conclusion that no site data exceed applicable screening criteria since site data for lead and zinc are only compared to CHSSLs for commercial/industrial land use. Basing site characterization on a comparison only to CHSSLs for commercial/industrial land use is not acceptable. As described in bold type in Step 4 of the approach for using CHSSLs, "For evaluation of commercial/industrial properties, it is highly recommended that site data be compared to CHHSLs for both unrestricted/residential and commercial land use," (Cal EPA, *Use of California Human Health*

Screening Levels (CHHSLs) in Evaluation of Contaminated Properties, January 2005). Furthermore, the method used to derive the CHHSL for lead in commercial/industrial soil is under evaluation and is considered an interim value. Therefore, ACEH requests that the USEPA Region IX Preliminary Remediation Goals (PRGs) for lead of 400 milligrams per kilogram (mg/kg) for residential soil and 800 mg/kg for commercial/industrial soil be used as screening levels for lead in soil instead of the CHHSL.

4. **Proposed Analyses for Soil Samples.** For additional soil borings SB-14 through SB-16, the depth intervals for laboratory analysis of soil samples that were requested in our September 13, 2007, were not incorporated into the *Revised Work Plan*. We do not concur with the alternate proposal by WEST to analyze soil samples from depths of 1 and 2 meters and hold one sample collected 3 meters bgs from each boring. As a side note, it is not clear why sampling intervals are proposed in meters since the previous version of Table 5-1 proposed intervals in feet and results from previous sampling have been referenced in feet. For consistency, we suggest that you use feet to describe sampling depths in the future. We request that soil samples from soil borings SB-14 through SB-16 be collected at 2-foot intervals to a depth of 10 feet bgs for laboratory analysis for lead and zinc using EPA Method 6010B and pH using EPA Method 150.1. Please present these results in the Site Investigation Report requested below.
5. **Location of Former Stream Channel.** Appendix D of the *Revised Work Plan* presents two historical drawings that depict the alignment of the former stream channel relevant to the Pacific Galvanizing property. We appreciate your providing these maps. However, the outline of the Pacific Galvanizing site added to the Sanborn Fire Insurance Map (1912-1952) in Appendix D is not accurate. The Pacific Galvanizing property is larger than shown. More importantly, the box culvert does not follow the alignment of the former creek channel. Whereas the box culvert is parallel to the alley until making a right angle turn near Coliseum Way, the former creek channel trended diagonally across the Pacific Galvanizing property. To show this more clearly, we have included a 1969 Sanborn Fire Insurance Map as Attachment 1 with an outline of the Pacific Galvanizing property shown accurately. In order to investigate whether the former channel provides a preferential pathway for contaminant migration, we request that you install well W-4 and collect a groundwater sample along the alignment of the former channel (see location on Attachment 2). Please see further discussion of the former alignment of the stream channel in technical comment 8 regarding the Conceptual Site Model.
6. **Well W-3.** ACEH requested that additional monitoring well W-3 be installed to assess whether the backfill along the box culverts is a preferential pathway for groundwater contamination and whether elevated concentrations of metals are present. The November 2007 WEST response indicates that well W-2 should provide information regarding the influence of the storm drain culvert on preferential migration of zinc in groundwater. This assumption is not valid and does not provide a basis for proposing a phased approach. Well W-2 will not provide information that will justify not installing well W-3. Therefore, installation of well W-3 is required. Please see technical comment 7 regarding soil sampling in well borings W-3 and W-4 and technical comment 9 regarding analysis of groundwater samples for metals.

7. **Soil Sampling in Monitoring Well Borings.** For proposed on-site wells W-3 and W-4, we request that you collect soil samples from 2-foot intervals to a depth of 10 feet bgs for laboratory analysis for lead and zinc using EPA Method 6010B and pH using EPA Method 150.1. Please present these results in the Site Investigation Report requested below.
8. **Conceptual Site Model.** The conceptual site model is based on an assumption that the former stream channel was in the same location as the box culvert. As discussed in technical comment 5 and shown on Attachment 1, this is not the case. Therefore, the conceptual site model does not appear to apply to most of the site. Specifically, the CSM does not apply to many of the sampling locations in the alley where the highest concentrations of metals have been detected in soil. We do not concur with the theory proposed by WEST that the occurrence of zinc in groundwater is entirely attributable to releases to the stream channel prior to backfilling of the box culvert and paving.
9. **Groundwater Sampling.** We acknowledge that the issue of total versus dissolved metals analysis is subject to differing information and guidance from different regulatory agencies. Pros and cons can be cited for either total or dissolved analysis for metals in groundwater. Although WEST uses quotations from the California Environmental Protection Agency and the California Toxics Rule to support the use of dissolved metals analysis, similar regulatory guidance is available to indicate that total metals analysis is preferable. In order to address this issue, we request that the groundwater samples be analyzed for both total and dissolved metals. This practice is consistent with guidance provided in the *RCRA Comprehensive Groundwater Monitoring Evaluation Document*, March 1988, USEPA-OWPE Directive 9950.2, page 22. Please present results for total and dissolved metals analysis in the Site Investigation Report requested below.
10. **Groundwater Protection Levels.** The Groundwater Protection Level is intended to help predict concentrations of zinc below which the leaching of zinc will not result in groundwater concentrations that exceed water quality goals. If zinc concentrations in soil are less than the Groundwater Protection Level of 310,000 mg/kg then the concentration of zinc in groundwater should be less than the water quality goal of 5 mg/L. Our technical comment regarding the Groundwater Protection Level pointed out that zinc has been detected in groundwater at concentrations ranging from 210 to 280 mg/L but the concentrations of zinc in soil are less than the Groundwater Protection Level. We believe this remains a valid observation when evaluating the applicability of the Groundwater Protection Level proposed by WEST.
11. **Table 5-1.** Table 5-1 includes the notation, "USEPA 6000," below the heading Lead/Zinc. The text indicates that groundwater samples will be analyzed using EPA method 6010/7000 series. For clarification, we request that soil and groundwater samples be analyzed for lead and zinc using EPA Method 6010B.
12. **References to Fuel Leak Case.** With regard to the two comments made by WEST regarding applicability of language for a fuel leak case, we have removed the references to the California Health and Safety Code Section 25296.10 and "fuel leak case," from our correspondence for this SLIC case.

Mr. Jack Schultz
Mr. Rory MacNeil
RO0002477
December 20, 2007
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TECHNICAL REPORT REQUEST

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

- **February 25, 2008** – Revised Work Plan or Notification of Intent to Implement Site Investigation with Conditional Approval
- **April 25, 2008** – Site Investigation Report

ELECTRONIC SUBMITTAL OF REPORTS

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was 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 SLIC case.

Mr. Jack Schultz
Mr. Rory MacNeil
RO0002477
December 20, 2007
Page 6

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

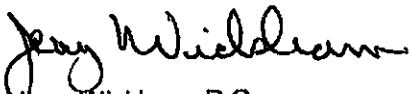
The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For 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 SLIC case meet this requirement.

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.

Sincerely,



Jerry Wickham, P.G.

Hazardous Materials Specialist

Attachment 1: Sanborn Map -- 1969

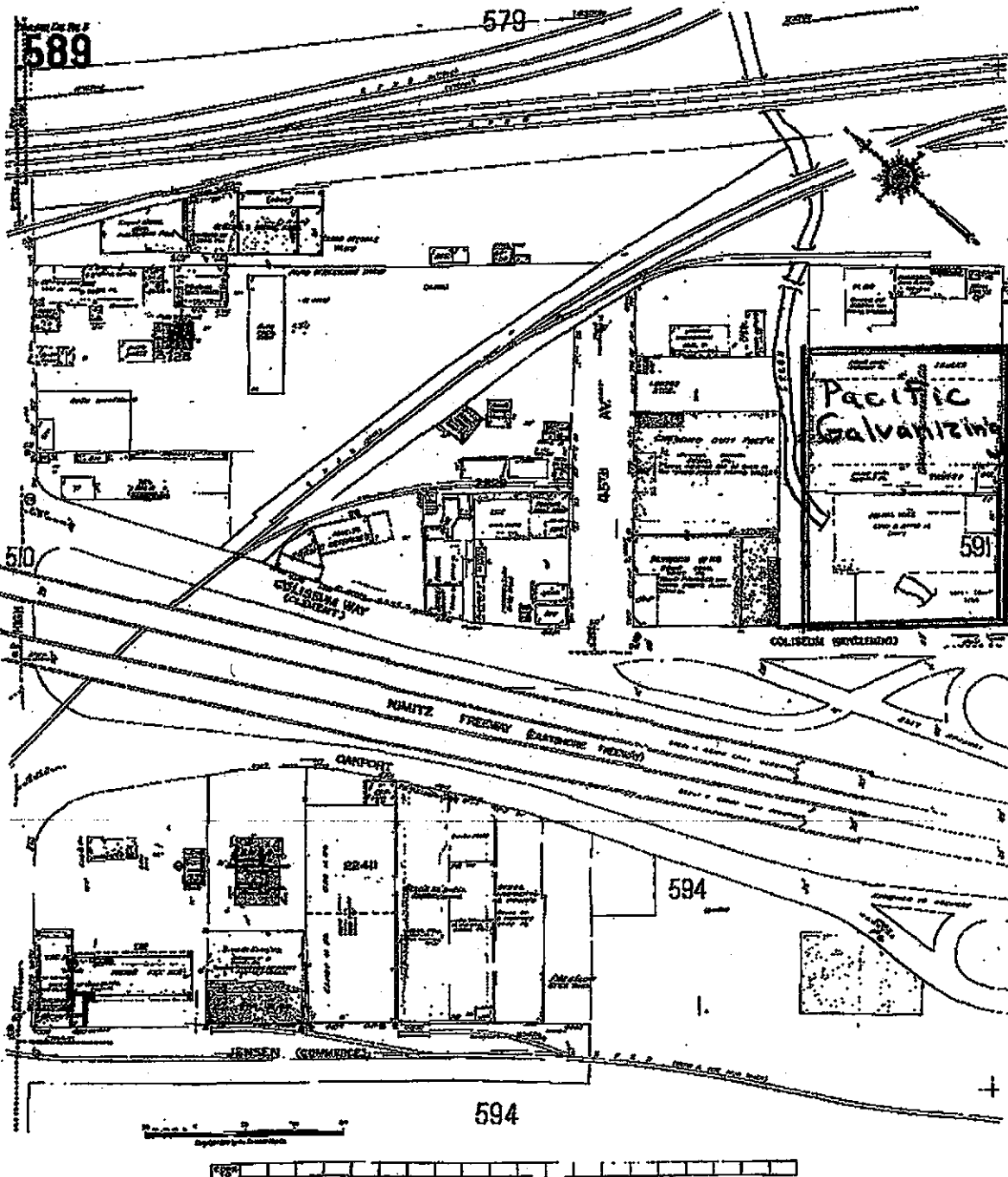
Attachment 2: Proposed Sampling Locations


Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Peter Krasnoff
WEST Environmental Services & Technology
711 Grand Avenue, Suite 220
San Rafael, CA 94901

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

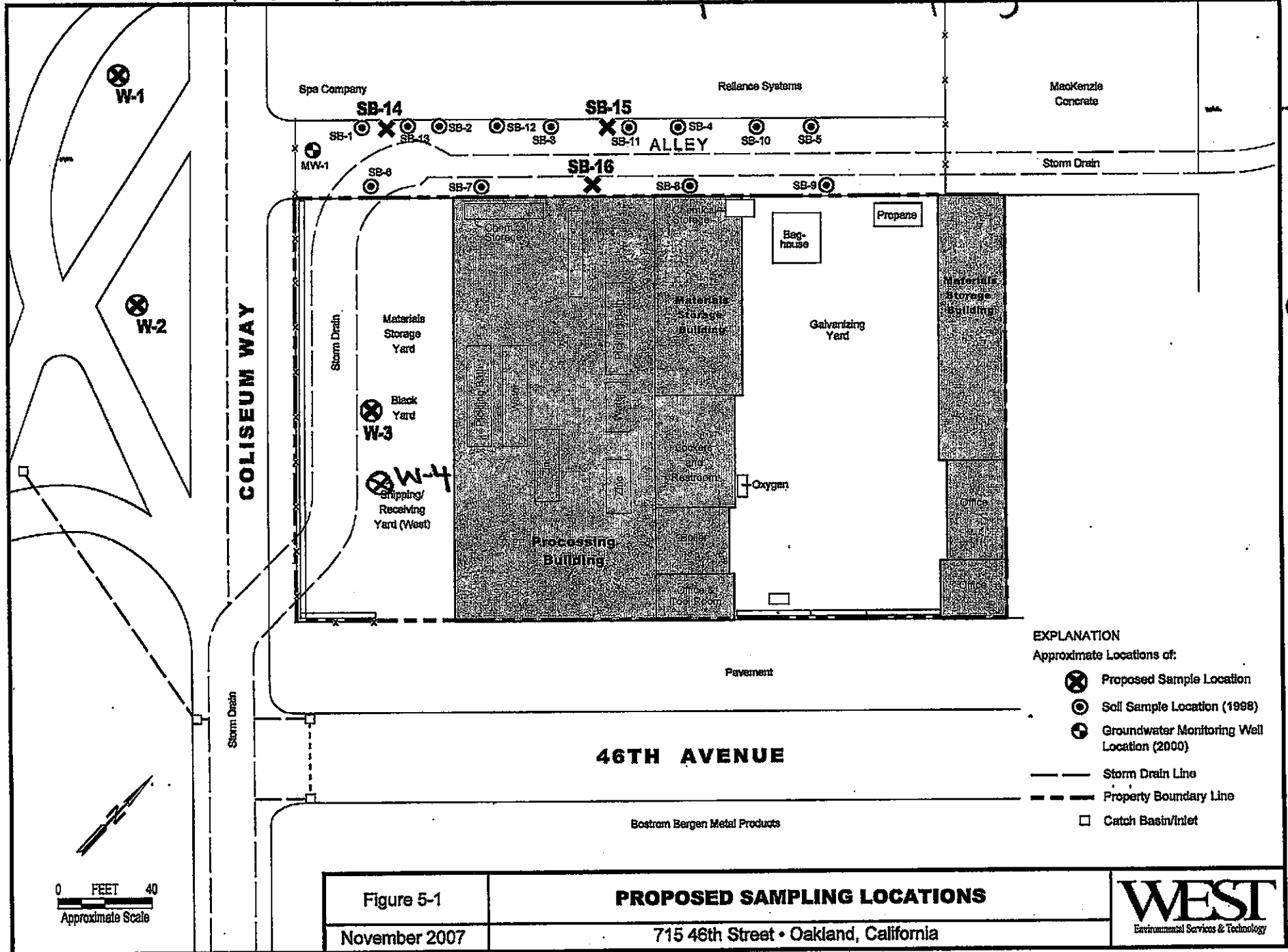
Attachment 1 - Sanborn Map 1969



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Attachment 2 - Proposed Sampling Locations



- EXPLANATION**
 Approximate Locations of:
- ⊗ Proposed Sample Location
 - ⊙ Soil Sample Location (1998)
 - ⊕ Groundwater Monitoring Well Location (2000)
 - Storm Drain Line
 - - - Property Boundary Line
 - Catch Basin/Inlet

0 FEET 40
 Approximate Scale

Figure 5-1	PROPOSED SAMPLING LOCATIONS
November 2007	715 46th Street • Oakland, California



Wickham, Jerry, Env. Health

To: Peter Krasnoff
Cc: Jack Schultz
Subject: RE: Pacific Galvanizing, 715 46th Street, Oakland, Case RO0002477

Peter,

In reviewing the letter of September 13, 2007, our comments seemed quite clear for revision of a Work Plan. Therefore, what issues you may have for implementing the work. Please provide an agenda and identify the issues that require clarification.

Regards,
Jerry Wickham
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 fax
jerry.wickham@acgov.org

-----Original Message-----

From: Peter Krasnoff [mailto:peterk@westenvironmental.com]
Sent: Monday, October 01, 2007 11:08 AM
To: Wickham, Jerry, Env. Health
Cc: Jack Schultz
Subject: Pacific Galvanizing, 715 46th Street, Oakland, Case RO0002477
Importance: High

Mr. Wickham:

We are in receipt of your comment letter of September 13, 2007 regarding Pacific Galvanizing's proposed investigation at 715 46th Street in Oakland, California. With the goal of expediting the review process, we believe that a meeting would help clarify issues and aid in refining the proposed scope of the investigation. Please advise your availability for a meeting with Mr. Jack Schultz of Pacific Galvanizing during the week of October 15, 2007.

Thank you in advance for your help in this matter.

Peter

--
Peter M. Krasnoff, P.E.
WEST, Inc.
711 Grand Avenue, Suite 220
San Rafael, CA 94901
Direct: (415) 485-1660
Cellular: (415) 971-1600
Text Pager: 4159711600@vtext.com
Main: (415) 460-6770 ext. 208
Fax: (415) 460-6771

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=====

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



F

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

September 13, 2007

Mr. Jack Schultz
Pacific Galvanizing
715 46th Avenue
Oakland, CA 94601

Mr. Rory MacNeil
Alameda County Real Estate
399 Elmhurst Street
Hayward, CA 94544-1395

Subject: SLIC Case RO0002477 and Geotracker Global ID T06019782176, Pacific Galvanizing, 715 46th Avenue, Oakland, CA 94601

Dear Mr. Schultz and Mr. MacNeil:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above referenced site including the recently submitted document entitled, "Site Investigation Work Plan, SLIC Case RO0002477, Pacific Galvanizing, 715 46th Avenue, Oakland, California," dated August 2007. The Work Plan includes a conceptual site model and screening level assessment, a data gaps analysis, and field sampling plan.

The Work Plan proposes the installation and sampling of two monitoring wells west of the site. We have no objection to the installation and sampling of the two wells; however, we request that one additional monitoring well and three additional soil borings be advanced at the site. We request that you address the following technical comments and submit a revised Work Plan by **November 16, 2007**.

TECHNICAL COMMENTS

1. **Lateral and Vertical Extent of Contamination.** The lateral and vertical extent of contamination has not been defined. Soil sampling to date has apparently been limited to a depth of 5 feet bgs in the alley. We request that you advance three additional soil borings within the alley to define the vertical extent of contamination; recommended locations are shown on the attached figure entitled, "Recommended Sampling Locations." The borings should be advanced to minimum depths of 10 feet bgs with soil samples collected for lead and zinc analysis at 2-foot intervals.
2. **Location of Former Stream Channel.** Please identify the former location of the stream channel prior to construction of the box culverts west or south of the alley on a figure in the revised Work Plan requested below. Please adjust one or more of the proposed monitoring wells as necessary to assure that one monitoring well is installed within the former channel.

Mr. Jack Schultz
Mr. Rory MacNeill
RO0002477
September 13, 2007
Page 2

3. **Additional Monitoring Well.** We request that you install one additional monitoring well adjacent to the storm drain at the recommended location shown on the attached figure in order to assess whether the backfill along the box culverts is a preferential pathway for groundwater contamination and whether elevated concentrations of metals are present. We request that soil samples be collected from the monitoring well boring for lead and zinc analysis.
4. **Conceptual Site Model.** The Conceptual Site Model indicates that metals contamination to soils in the former creek channel was caused by historic spills and dragout of galvanized material when the former creek channel was exposed. The Work Plan also indicates that the potential for incidental spills has been addressed subsequent to placement of the concrete box culverts and pavement. In the revised Work Plan requested below, please expand the discussion in the conceptual model regarding the history of the galvanizing operations and potential historic spills in relation to the open channel, construction of the box culvert, and paving of the Alley, Black Yard, and Galvanizing Yard. In particular, please discuss whether soils beneath the Black Yard may have been impacted prior to paving of the Black Yard.
5. **Groundwater Sampling.** We concur with the proposed low flow sampling methods and proposed analytical methods. We also note that previous groundwater samples were filtered in the laboratory. We request that the groundwater samples not be filtered in the field or laboratory prior to analyses.
6. **Groundwater Protection Levels.** The soil screening level for groundwater protection (310,000 mg/kg) that is derived for zinc using the designated level methodology does not appear to be applicable to the site. The maximum concentration of zinc detected in soil (130,000 mg/kg) is less than the soil screening level for groundwater protection but zinc has been detected in groundwater at concentrations ranging from 210 to 280 mg/L, which exceeds the water quality goal of 5 mg/L.

TECHNICAL REPORT REQUEST

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

- **November 16, 2007** – Revised Work Plan

These reports are being requested pursuant to California Health and Safety Code Section 25296.10.

ELECTRONIC SUBMITTAL OF REPORTS

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight

Mr. Jack Schultz
Mr. Rory MacNeil
RO0002477
September 13, 2007
Page 3

Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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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.

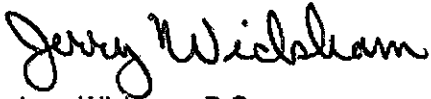
AGENCY OVERSIGHT

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Mr. Jack Schultz
Mr. Rory MacNeil
RO0002477
September 13, 2007
Page 4

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

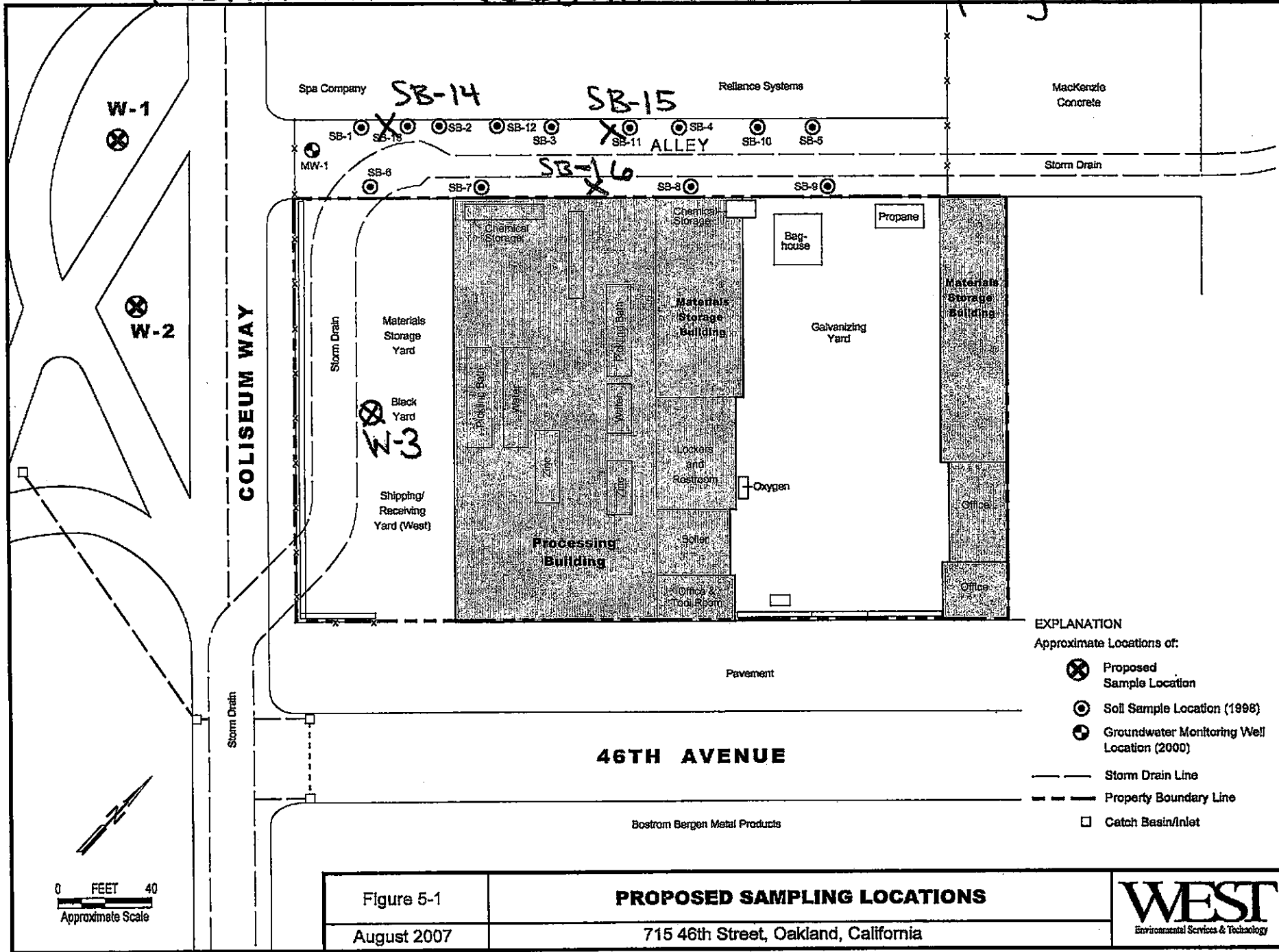
Attachment: Recommended Sampling Locations (figure)

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Peter Krasnoff
WEST Environmental Services & Technology
711 Grand Avenue, Suite 220
San Rafael, CA 94901

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Attachment: Recommended Sampling Locations



- EXPLANATION**
 Approximate Locations of:
- ⊗ Proposed Sample Location
 - ⊙ Soil Sample Location (1998)
 - ⊕ Groundwater Monitoring Well Location (2000)
 - Storm Drain Line
 - - - Property Boundary Line
 - Catch Basin/Inlet

0 FEET 40
 Approximate Scale

Figure 5-1	PROPOSED SAMPLING LOCATIONS
August 2007	715 46th Street, Oakland, California



Wickham, Jerry, Env. Health

To: Peter Krasnoff
Cc: Jack Schultz
Subject: RE: Pacific Galvanizing, 715 46th Avenue, SLIC Case R00002477

Peter,

Based upon your request, the schedule for submittal of a Work Plan on case R02477 is extended to August 15, 2007.

Regards,
Jerry Wickham
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 fax
jerry.wickham@acgov.org

-----Original Message-----
From: Peter Krasnoff [mailto:peterk@westenvironmental.com]
Sent: Monday, July 16, 2007 6:22 PM
To: Wickham, Jerry, Env. Health
Cc: Jack Schultz
Subject: Pacific Galvanizing, 715 46th Avenue, SLIC Case R00002477

Jerry:

Pursuant to our discussion of last Thursday, West Environmental Services & Technology, Inc. (WEST) is writing on behalf of Pacific Galvanizing of 715 46th Avenue, Oakland, California to request an extension for the submittal of the requested work plan. Due to scheduling issues, we are requesting an extension for the submittal date from July 19, 2007 to August 15, 2007. We appreciate your cooperation in this matter. Please contact me if you have any questions or wish to discuss this request.

Thank you,

Peter

--
Peter M. Krasnoff, P.E.
WEST, Inc.
711 Grand Avenue, Suite 220
San Rafael, CA 94901
Direct: (415) 485-1660
Cellular: (415) 971-1600
Text Pager: 4159711600@vtext.com
Main: (415) 460-6770 ext. 208
Fax: (415) 460-6771

CONFIDENTIALITY NOTICE: This communication and any accompanying document(s) are confidential and privileged. They are intended for the sole use of the addressee. If you receive this transmission in error, you are advised that any disclosure, copying, distribution, or the taking of any action in reliance upon the communication is strictly prohibited. Moreover, any such inadvertent disclosure shall not compromise or waive the attorney-client privilege as to this communication or otherwise. If you have received this communication in error, please contact our office at main@westenvironmental.com or by telephone at (415) 460-6770. Thank you.
=====

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



F

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

May 4, 2007

Mr. Jack Schultz
Pacific Galvanizing
715 46th Avenue
Oakland, CA 94601

Mr. Rory MacNeil
Alameda County Real Estate
399 Elmhurst Street
Hayward, CA 94544-1395

Subject: SLIC Case R00002477 and Geotracker Global ID T06019782176, Pacific Galvanizing, 715 46th Avenue, Oakland, CA 94601

Dear Mr. Schultz and Mr. Rory MacNeil:

I am the caseworker recently assigned to your case. Please send future correspondence or inquiries regarding this case to my attention. Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above referenced site. The site currently consists of an approximately 40-foot wide alley located northwest of the Pacific Galvanizing facility at 715 46th Street in Oakland. The alley, which contains two seven-foot diameter underground storm drain culverts, is owned by the Alameda County Flood Control District. The alley (site) is reportedly leased by Pacific Galvanizing for storage of equipment and also serves as a right-of-way for the storm drain box culvert. Elevated concentrations of lead and zinc have been detected in soil samples collected 5 feet below ground surface at various locations throughout the site. Alameda County Flood Control District and Pacific Galvanizing are responsible parties for this case.

This case has been inactive for some time due in part to a lack of response to regulatory requests and lack of regulatory oversight funds. The most recent technical report in ACEH files is entitled, "Work Plan for Supplemental Investigation at Pacific Galvanizing, 715 46th Avenue, Oakland, California," dated February 9, 2000. In correspondence dated February 14, 2000, ACEH approved the Work Plan with several changes and additions. ACEH correspondence dated November 1, 2001 requested a report documenting monitoring well installation at the site. No subsequent report to indicate that the work was conducted is in our files. As discussed in the Request for Information below, please submit missing reports as soon as possible but no later than July 19, 2007. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

REQUEST FOR INFORMATION

The list below identifies documents currently in the ACEH case files. We request that you provide copies of any more recent or historic documents that are not in ACEH files and are relevant to this SLIC case by July 19, 2007.

Mr. Jack Schultz
Mr. Rory MacNeil
RO0002477
May 4, 2007
Page 2

Documents Currently in ACEH Files:

H2OGEOL. 1994. "Report for Monitoring Well Installation and Soil and Groundwater Sampling at 715 46th Avenue," January 11, 1994

WEST. 1997. "Proposal to Conduct Site Closure Characterization, 715 46th Avenue, Oakland, California," March 9, 1997.

WEST. 1999. "Site Investigation, Pacific Galvanizing, 715 46th Avenue, Oakland, California," October 15, 1999.

WEST. 1999. Facsimile of "Analytical Report," Prepared for Earth Technology Corporation by Curtis & Tompkins Analytical Laboratories, dated March 23, 1999.

WEST. 2000. "Work Plan for Supplemental Investigation at Pacific Galvanizing, 715 46th Avenue, Oakland, California," February 9, 2000.

TECHNICAL COMMENTS

1. **Elevated Concentrations of Lead and Zinc in Soil.** Lead was detected at concentrations up to 5,300 milligrams per kilogram (mg/kg) and zinc was detected at concentrations up to 130,000 mg/kg in soil samples collected from a depth of 5 feet bgs in the alley. The concentration of lead and zinc in surface soil samples does not appear to be known. The source of these elevated concentrations of metals in soil is not identified in the reports in ACEH files. In the Work Plan requested below, please identify the possible sources of the metals in soil including any known releases that occurred on the site. Please also identify the potential for releases of metals to the soils to be currently ongoing.
2. **Proposed Mitigation.** The "Site Investigation," report dated October 15, 1999 discusses reducing worker exposure to elevated concentrations of lead and zinc by covering the alley with pavement. It should be noted that covering the area with pavement is a temporary mitigation measure that does not fully or permanently address the issue of elevated concentrations of metals in the soil. Please confirm in the Work Plan requested below whether or not the alley area was paved.
3. **Lateral and Vertical Extent of Contamination.** The lateral and vertical extent of contamination has not been defined. Soil sampling to date has apparently been limited to a depth of 5 feet bgs in the alley. The extent of metals in surface soils and extending beyond the alley is currently unknown. We request that you present plans to identify the lateral and vertical extent of elevated concentrations of metals in soils metals in the Work Plan requested below. In particular, the potential for metals to be transported off-site by surface runoff to storm drains or open surface water must be evaluated.

Mr. Jack Schultz
Mr. Rory MacNeil
RO0002477
May 4, 2007
Page 3

TECHNICAL REPORT REQUEST

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

- **July 19, 2007** – 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

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was 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.

Mr. Jack Schultz
Mr. Rory MacNeil
RO0002477
May 4, 2007
Page 4

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

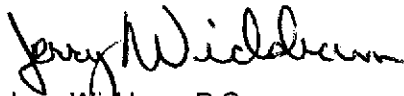
The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For 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.

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.

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES



7

AGENCY
DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

May 25, 2006

Mr. Jack Schultz
Pacific Galvanizing
715 46th Avenue
Oakland, CA 94601

Subject: SLIC Case [REDACTED] Pacific Galvanizing, 715 46th Avenue, Oakland, CA

Dear Mr. Schultz:

Our records indicate that the current balance on the above-referenced SLIC oversight account is a negative \$885.50. In order to continue to provide regulatory oversight, we are requesting the submittal of a check made payable to Alameda County Environmental Health in the amount of \$3,000. Please send your check to the attention of our Finance Department.

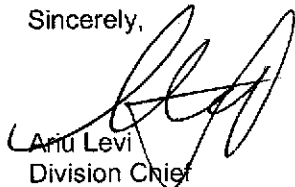
This deposit may or may not be sufficient to provide all necessary regulatory oversight. ACEH will deduct actual costs incurred based upon the hourly rate specified below. If these funds are insufficient, an additional deposit will be requested. Otherwise, any unused monies will be refunded to you or your designee.

The deposit is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project is being debited at the Ordinance specified rate, currently \$166.00 per hour.

Please write "SLIC" (the type of project), the site address, and the AR# 0306001 on your check.

If you have any questions, please contact Jerry Wickham at (510) 567-6791.

Sincerely,


Ariu Levi
Division Chief

cc: D. Drogos, J. Jacobs, Jerry Wickham

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

CO0000098

November 1, 2001

Mr. Jack Schultz
Pacific Galvanizing
715 46th Avenue
Oakland, CA 94601

RE: Supplemental Investigation Report for 715 46th Ave, Oakland, CA

Dear Mr. Jack Schultz:

In February 2000, I approved a work plan for the installation of a groundwater monitoring well at the above referenced site. It is my understanding that the well was installed last fall. To date, this office is not in receipt of a report documenting the well installation, and/or any reports of quarterly groundwater monitoring at the site. The required reports must be submitted as soon as possible.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: Steven Michelson, WEST Environmental, 828 Mission Ave, 2nd Floor, San Rafael,
CA 94901

PACIFIC GALVANIZING

Telephone (510) 261-7331
Fax (510) 261-7526

715 46th Avenue
Oakland, CA 94601

Date: 7/17/2000

Fax Cover Sheet

Co: ALAMEDA COUNTY Attention: EVA CHU

Fax No.: _____ Phone No.: _____

From: Jack Schultz Mike Drumm Ken Hopson Jill Repanich

Comments and/or Special Instructions: _____

Copy of Canceled CHECK

Total number of pages including cover sheet: 3

(If you did not receive all pages specified, please call back as soon as possible.)

The original document will be mailed to you.

Fax only

▶1220004964
UNION BANCA, NA MSC
RTY PK 91755 03/01/00
2481002720

PAY TO THE ORDER OF
SUPERVISOR OF THE ALAMEDA COUNTY
FOR DEPOSIT ONLY
HEALTH CARE SERVICES AGENCY
ENVIRONMENTAL HEALTH

MR 02 12 2000 000003 00141
1210-0037-4
11111014



PACIFIC GALVANIZING
715 - 48TH AVENUE PH. 510-281-7331
OAKLAND, CA 94601

BAY BANK OF COMMERCE
SAN LEANDRO, CA 94577

NO. 22317

9444, 16

00-3823/1211

PAY THIS AMOUNT

DATE	AMOUNT
02 23 00	\$1,500.00

***** One Thousand Five Hundred and 00/100 *****

TO THE ORDER OF: ALAMEDA CO. HEALTH CARE SERV.
1131 HARBOR BAY PARKWAY,
ALAMEDA, CA
94502-657

TWO SIGNATURES REQUIRED FOR AMOUNTS OVER \$10,000.00
[Handwritten Signature]
[Handwritten Signature]

⑈022317⑈ ⑆121138233⑆ 001118439⑈ ⑆0000150000⑆

***** Alameda County Department of Environmental Health *****
 Deposit/Refund Account History

** PROJECT INFORMATION **

Project#: --6265A Date Open: 01/21/1998 Date Closed:

Payor Information:

Site Information:

 PACIFIC GALVANIZING
 715 --46TH AVENUE
 OAKLAND CA 94601

 PACIFIC GALVANIZING
 715 --46TH AVENUE
 OAKLAND CA 94601

** DEPOSIT HISTORY **

Deposit Date	Receipt#	Amount Received
-----	-----	-----
01/21/1998	804965	\$ 1,200.00
02/25/2000	842434	\$ 1,500.00

		\$ 2,700.00

** WORKLOG HISTORY **

Work Date	Insp	Activity Description / Time Spent (hrs)	Amount Charged
-----	-----	-----	-----
06/24/1996	ML	Review Plans/Reports	3.5 315.0
01/20/1998	ML	Review Plans/Reports	1. 94.0
01/21/1998	adm	administrative charge	1. 94.0
07/26/1999	ec	Meetings, Consultations	0.3 30.0
10/27/1999	EC	Meetings, Consultations	1.6 160.0
11/17/1999	EC	Meetings, Consultations	0.4 40.0
11/29/1999	EC	Meetings, Consultations	1. 100.0
01/10/2000	EC	Meetings, Consultations	0.3 30.0
02/09/2000	EC	Meetings, Consultations	0.4 40.0
02/10/2000	BC	Meetings, Consultations	0.3 30.0
02/10/2000	EC	Investigation in Office	2.3 230.0
02/14/2000	EC	Investigation in Office	1.3 130.0
02/15/2000	EC	Investigation in Office	0.2 20.0

			\$ 1,313.00
	Balance:\$	1,387.00	Amount Refunded: \$

Listing HAZMAT DAILY activities since 1987 for StID # 1141
as of 02/09/2000

at 715 46th Ave , Oakland CA 94601

InspDat	Insp	DailBDat	Act	InspT	StID	COMMENTS
-----	----	-----	---	-----	-----	-----
InspDat	Insp	Activi	Categ	InspT	StID	
-----	----	-----	-----	-----	-----	
03/27/1987	LM	I	1	3.	1141	
07/11/1990	CC	-0-		45	1.	1141 L
08/02/1990	CC	-0-		11	0.5	1141 L
08/02/1990	CC	-0-		42	2.	1141 L
08/06/1990	CC	-0-		11	3.5	1141 L
08/07/1990	CC	-0-		11	1.	1141 L
08/29/1990	CC	-0-		42	1.	1141 L
04/04/1991	CC	-0-		74	1.5	1141 ♦
04/04/1991	CC	-0-		75	1.5	1141 ♦
04/10/1991	CC	-0-		74	1.	1141 ♦
04/22/1991	CC	-0-		74	2.	1141 .
02/24/1992	RO	-0-		75	0.5	1141 Tranfer to LOP
03/06/1992	JM	-0-	200	0.5	1141	Retrieved R.P. Names and wrote NotificationLetter.
03/13/1992	JE	-0-	200	0.4	1141	-0-
03/16/1992	JM	-0-	200	0.6	1141	Filed copy of Not. letter, located Dep/ref sheet and gave to Tim.
03/27/1992	SH	-0-	215	0.2	1141	discuss case with B. Chan & review letter
04/03/1992	TP	-0-	215	0.4	1141	QR, assign priority
06/03/1992	TP	-0-	215	1.8	1141	w/letter
06/16/1992	TP	-0-	212	0.5	1141	w/Rudy Foertsch, Paul Smith
06/24/1992	TP	-0-	215	0.1	1141	letter
09/08/1992	DH	-0-	19	0.2	1141	disc
09/22/1992	BJ	-0-	15	1.5	1141	review file, discuss with Paul
09/22/1992	PS	-0-	77	0.5	1141	conv. w/ Brit re Pacific Galvanizing re: complain
09/25/1992	BJ	-0-	15	1.5	1141	discuss complaint with Aln Whitman, walk around site
09/29/1992	BJ	-0-	11	2.5	1141	-0-
09/29/1992	BJ	-0-	15	0.25	1141	meet with Ariu and Don Hwang re inspection
09/29/1992	BJ	-0-	15	2.	1141	review lit. on galvanizing telephone call to DTSC re haz waste
09/29/1992	BJ	-0-	51	1.	1141	-0-
06/17/1993	BJ	-0-	15	2.	1141	share infor with Nabil of City of Berkeley and copy their recent sampling which found pb and zn contamination above HW levels in soil
09/02/1993	AG	-0-	39	1.	1141	went in to ask about the closed facility, next door regarding USTs
04/07/1994	AG	-0-	11	1.	1141	-0-
04/07/1994	AG	-0-	51	1.	1141	-0-
04/07/1994	AG	-0-	120	2.5	1141	-0-
09/30/1994	PE	-0-	129	0.25	1141	Oakland file review request - Joe Trapp
10/14/1994	DH	-0-	15	0.5	1141	Lorenzo Perez, City Berk 644-7719
11/23/1994	LS	-0-	15	0.25	1141	Phone conversation concerning illegal disposal
11/29/1994	AG	-0-	91	2.5	1141	talked to Newton about the above site, reviewed the files and got ready for a

12/05/1994	AG	-0-	15	2.5	1141	follow up inspection as requested by Joe Trapp City of Oakland
12/06/1994	AG	-0-	13	3.	1141	review and work on the above site as requested thru City of Oakland Joe Trapp
12/06/1994	AG	-0-	15	2.5	1141	Joint inspection with Jeff Nale of DTSC, Joe Trapp City of Oakland, Captain Fletcher of OFD, And Britt Johnson, Britt and Fletcher left early.
06/24/1996	ML	*****	75	3.5	1141	review of title 22 and disscussion with Jeff Nale of DTSC about the above site
01/20/1998	ML	*****	75	1.	1141	Pacific Galvanizing, City of Oakland, Joe Trap, no dep - ref yet. Review, letter, phone coversation
07/26/1999	EC		77	0.3	1141	review workplan
10/27/1999	EC		77	1.6	1141	psa rpt coming in 2 weeks
10/27/1999	LS		200	0.3	1141	rev rpt
11/17/1999	EC		77	0.4	1141	met with Eva C. remediation
11/29/1999	EC		77	1.	1141	disc deficiencies of rpt w/ p krasnakov
01/10/2000	EC		77	0.3	1141	rev fax of initial ss. convs w/ s michelson. disc metals w/ barney
						disc hp w/ s michelson

=====

LEGEND FOR 'OLD' DAILY ENTRIES

Category: (Program)

Activity:

O - Office	I - regular Inspection	1 - Generators
L - Legal	F - Follow up inspection	2 - UG Tanks
P - Program	S - Spill / release	3 - Business Plans
T - Training	Q - reQuest / complaint	4 - Haz.Waste Hauler
A - Advice / consult.		5 - Emerg. Resp.
E - Environ. study		6 - Contam. Site
		7 - Public Lands
		8 - Residential

Valid for Dailies in 1987, 1988 & 1989

Complete

ALAMEDA COUNTY ENVIRONMENTAL HEALTH - HAZARDOUS MATERIALS PROGRAM
INFORMATION PER SITE ON ALL DEPOSITS FROM ALL PAYORS

as of 07/26/1999

DATABASE: DEPREF

~~~~~

=====  
SITE INFORMATION from DepRef DB  
=====

Pacific Galvanizing  
715 46th Ave  
Oakland CA 94601

StID: 1141 Site#: 6265  
Site Complete? -0-

=====  
ALL PAYORS ON SITE  
=====

> Project# 6265A for Payor# 1090 Pacific Galvanizing  
715 - 46th Ave  
Oakland CA 94601

DR: WkShtPay

=====  
DEPOSIT INFORMATION  
=====

| Project# | Rcpt#  | DepDate    | DepAmount                  | Proj<br>Type | Deposit<br>Complete | Insp<br>Init | Collect<br>Fees? |
|----------|--------|------------|----------------------------|--------------|---------------------|--------------|------------------|
| 6265A    | <----- |            |                            |              |                     |              |                  |
|          | 804965 | 01/21/1998 | \$1,200.00                 | M            | -0-                 | ML           | -0-              |
|          |        |            | Total Deposit for Project: | \$1,200.00   |                     |              |                  |
|          |        |            | -----                      |              |                     |              |                  |
|          |        |            | Total Deps for all Sites : | \$1,200.00   |                     |              |                  |

Report WkShtDep Complete; 6/99

LAST WORK DATE FROM BILLING ON THIS SITE: -0-

1141 --6265?

=====

02/09/2000

Select Site#=5 StID=4 Contr#=6 SiteName=15 Site#add=5 SiteStr=15 +  
(SGET(SiteCity,6,1))=6 SiteZip=5 StCompl from Sites where Site# = .vSite#  
Site# StID Contr# SITENAME SITE# SITESTR COMPUT SITEZ StCompl

-----  
6265 1141 1090 Pacific 715 46th Ave Oaklan 94601 -0-  
Galvanizing

\*( )  
sho v tProj#  
6265?

\*( )  
Sel proj#=7 contr#=6 rcpt#=6 DepDate check#=10 DepAmt=10 type +  
inspinit=4 dcompl from deposit where proj# = .tProj# ORDER by Proj# DepDate  
proj# CONTR# RCPT# DepDate CHECK# DepAmt Type INSP DCompl

-----  
6265A 1090 804965 01/21/1998 20204 \$1,200.00 M ML -0-

\*( )  
\*( )  
show v #date  
02/09/2000

\*( )  
\*( HAZMAT DEPOSIT REFUND FULL SITE HISTORY: DEPOSITS )  
\*( ===== )  
set echo off

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION (LOP)  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

StID 1141

February 14, 2000

Mr. Jack Schultz  
Pacific Galvanizing  
715 46<sup>th</sup> Avenue  
Oakland, CA 94601

**RE: Project #6265A, Add-on  
at 715 46<sup>th</sup> Avenue, Oakland, CA**

Dear Mr. Schultz:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$1,500.00, payable to Alameda County, Environmental Health Services, within two weeks of receipt of this letter.

It is expected that the amount requested will allow the project to be completed with a zero balance. Otherwise, more money will be requested, or any unused monies will be refunded to you or your designee.

The deposit/refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$100 per hour.

Please be sure to write the following identifying information on your check:

project #6265A/ Stid #1141  
type of project (Remediation, add-on), and  
site address (715 45<sup>th</sup> Avenue, Oakland)

If you have any questions, please contact me at (510) 567-6762.

eva chu  
Hazardous Materials Specialist

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION (LOP)  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

StID 1141

February 14, 2000

Mr. Jack Schultz  
Pacific Galvanizing  
715 46<sup>th</sup> Avenue  
Oakland, CA 94601

**RE: Work Plan Approval for 715 46<sup>th</sup> Avenue, Oakland, CA**

Dear Mr. Schultz:

I have completed review of World Environmental Services and Technology's February 2000 *Work Plan for Supplemental Investigation* prepared for the above referenced site. The work plan proposes to advance a soil boring in the northwest corner of the site to collect a grab groundwater sample. The proposal is acceptable if the following changes/additions are made:

- The soil boring should be converted into a permanent groundwater monitoring well (with at least a 2-inch diameter casing).
- Soil samples should be collected at five-foot intervals, with a sample from the capillary fringe for lead and zinc analyses.
- The soil boring should be continuously logged.

Please submit an amended work plan to include the above recommended changes. If you have any questions, I can be reached at (510) 567-6762.

eva chu  
Hazardous Materials Specialist

c: Steve Michelson, WEST, 828 Mission Avenue, 2<sup>nd</sup> Floor, San Rafael,  
CA 94901



## ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION

02/09/2000

## UNDERGROUND STORAGE TANK CLEANUP SITE

AGENCY#: 10000 SOURCE OF FUNDS: F-FEDERAL INSPECTOR: CL  
 StID: 1141 SUBSTANCE: 8006619 -Gasoline  
 SITE NAME: Pacific Galvanizing Corp. DATE REPORTED : 08/03/1990  
 ADDRESS : 715 46th Ave DATE CONFIRMED: 08/03/1990  
 CITY/ZIP : Oakland, CA 94601 MULTIPLE RP's : Y

CASE TYPE: O CONTRACT STATUS: 9 PRIOR:3B2 EMERGENCY RESPONSE:

|                     |     |             |                                 |
|---------------------|-----|-------------|---------------------------------|
| RP SEARCH           | : S | DATE END:   | 03/09/1992                      |
| PRELIM ASSESSMENT   | :   | DATE BEGIN: | DATE END:                       |
| REMEDIAL INVESTIG   | :   | DATE BEGIN: | DATE END:                       |
| REMEDIAL ACTION     | : C | DATE BEGIN: | 09/13/1990 DATE END: 09/13/1990 |
| POST REMED MONITOR: | C   | DATE BEGIN: | 12/06/1993 DATE END: 06/05/1995 |

TYPE ENFORCEMENT ACTION TAKEN: 1 DATE OF ENFORC. ACTION: 03/09/1992

## UNDERGROUND STORAGE TANK CLEANUP SITE - SCREEN #2

LUFT FIELD MANUAL CONSIDERATION: 3HSCA CASE CLOSED: Y on: 05/02/1996

DT EXC START: 08/03/1990 REMEDIAL ACTIONS TAKEN: UK

RP #1: CONTACT: R. J. Foertsch RP COST: \$0.00  
 RP COMPANY NAME: New Cane Properties Ph:  
 ADDRESS: 715 46th Avenue  
 CITY/STATE: Oakland Ca 94601

SITE ID#: 1141

## ADDITIONAL RP'S

RP #2  
 CONTACT NAME: David Mac Donald  
 COMPANY NAME: Waste Management Of Alameda Co RP Ph:  
 ADDRESS: 172 98th Ave.  
 CITY/ST/ZIP: Oakland, C A 94603

\*\*\*\*\* Alameda County Department of Environmental Health \*\*\*\*\*  
 BILLING's WORKLOG: Total Deposit/Refund History for All Accounts at Site  
 ~~~~~

** SITE INFORMATION **

Site#: 6265 -- StID: 1141 PACIFIC GALVANIZING
 Date Open: 01/21/1998 715 --46TH AVENUE
 Date Closed: OAKLAND CA 94601

** PAYOR INFORMATION **

> Project # --6265A for Payor # 1090 PACIFIC GALVANIZING
 715 --46TH AVENUE
 OAKLAND CA 94601

** DEPOSIT HISTORY **

Proj#	Deposit Date	Receipt#	Amount Received
--6265A	01/21/1998	804965	\$ 1,200.00
			=====
			\$ 1,200.00

** WORKLOG HISTORY **

Proj#	Work Date	Activity Description	Insp	Time (hrs)	Amount Charged
--6265A	06/24/1996	Review Plans/Reports	ML	3.5 ✓	315.00
--6265A	01/20/1998	Review Plans/Reports	ML	1. ✓	94.00
--6265a	01/21/1998	administrative charge	adm	1. ✓	94.00
					503.00

Balance: 697.00 Amount Refunded:

Additional charges $\frac{360.00}{337.00}$

7/26/99 0.3
 10/27/99 1.6
 11/17/99 0.4
 11/29/99 1.0
 4/10/00 0.3

 balance as of 4/10/00 \$337.00

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Ro# 2477

Alameda County CC4580
Environmental Health Services
1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
(510)567-6700 FAX(510)337-9335

June 25, 1996

Jack Schultz
Pacific Galvanizing
715, 46th Avenue,
Oakland, CA - 94601

Re: Pacific Galvanizing - 715 46th Avenue, Oakland, CA 94601

Dear Mr. Schultz:

I am in receipt of the letter dated May 8, 1996 from Joseph Trap, City of Oakland Environmental Affairs Division regarding the proposal to cap the contaminated areas in the referenced site.

Based on the information submitted to this Department, concentrations of zinc and lead exceed the Title 22, Total Threshold Limit Concentrations (TTLIC) in some of the soil samples that were collected from the paved and the unpaved areas. Even if this Department approves capping, it is still reasonable to assume that a asphalt cap will not completely protect the contaminant from leaching to the groundwater. Hence, this Department requires that the following additional information/data be submitted in order to further evaluate the referenced site:

- The sample location plan does not mention the depth at which the samples were collected. Also, it appears that the vertical extent of contamination has not been defined. This information is needed to decide if it is just a surficial problem (less than 3 feet from below ground surface) or if the problem extends to greater depths they may facilitate contaminant migration to groundwater.
- A copy of the actual laboratory results of the soil samples collected from the site should be submitted to this Department.
- A detailed risk management plan should be submitted which should include at a minimum the following information:
 - Methods to mitigate any of the potential negative impacts posed by leaving contamination on-site, like capping the site, etc;
 - Strategies to address the potential risk, to construction workers, during current or future earth moving activities, foundation and utility trenching, water impoundments, etc;
 - Methods to restrict the contaminated soil to areas that will not be easily accessible;
 - If the concentrations of metals to be left on-site exceed the hazardous waste levels, a deed restriction or deed notification may be required;
 - Any data available that will support a low likelihood of contaminant migration to groundwater.

Please remit \$1200.00 to establish a deposit-refund account to offset the cost of staff time to provide oversight and review for closure. This deposit is authorized by Alameda County ordinance code section 3-141.6 to cover expenses incurred by county personnel for their oversight duties. Records are maintained for the time County employees commit to a project and the deposit will be debited at the rate of \$90.00 per hour for any time dedicated to your project. Any monies remaining in your account at the end of the project will be refunded. Additional monies may be needed if the project exhausts the fund. Please submit a check payable to "Treasurer, County of Alameda" with the words "Site Mitigation" written on the check for proper credit. Also, include the complete address of the site for which the deposit- refund account is to be established.

Sincerely,



Madhulla Logan
Hazardous Material Specialist

CC: **Dave Safreno**, Alameda County Flood Control District, 951 Turner Court, Hayward, CA -94545.

Joseph Trap, City of Oakland, Environmental Affairs, 1333 Broadway, Suite 330
Oakland, CA - 94612

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

✓ R02477 (SLIC)

R01092 (LOP)

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

October 6, 1992
STID 1141

New Cane Properties (also Branagh Inc.)
ATTN: Rudy Foertsch
715 - 46th Ave.
Oakland, CA 94601

Re: 715 - 46th Ave., Oakland, CA 94601

Dear Rudy Foertsch:

This office has received and reviewed a workplan for monitoring well installation and quarterly monitoring dated September 22, 1992 by ENSR. The recommendation for well installation and quarterly monitoring is accepted.

Please submit a site plan that shows the entire site. The one in the plan is very vague and does not distinguish between the site and 46th Ave. or show the location of any buildings or other obstructions.

Also enclosed is a format for site closure, which should be followed to meet the requirements of the Regional Water Quality Control Board.

If you have any questions please call this office at (510) 271-4530.

Sincerely,

Thomas F. Peacock, Supervising HMS
Hazardous Material Division

cc: R. Hiatt, RWQCB
Edgar Howell, Chief - File
Paul Hilbelink, ENSR, 1320 Harbor Bay Pkwy,
Alameda, CA 94501
enclosures

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R02477 (SUC)
R01092 (LOP)

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

April 10, 1991

Mr. Mike Huron
Pacific Galvanizing
715 46th Avenue
Oakland, CA 94601

RE: Tank removal at Pacific Galvanizing, 715 - 46th Avenue,
Oakland

Dear Mr. Huron:

On August 3, 1990, three underground storage tanks were removed from the above referenced address. Two of the soil samples from the two 3,000 gallon tanks had values of 440 and 410 ppm of total petroleum hydrocarbons (TPH). Benzene values for the two samples were 14 and 3 ppm. In addition, one of these two tanks had many rusted out holes on the bottom. The third tank, a 1,000 gallon tank, had minimal contamination, and appears not to require additional investigation.

On August 29, 1990, there was a site meeting attended by you, Mr. Dick Burge of R.W. Johnston, Hagop Kevork of Kaprealian Engineering, and myself regarding the larger tank excavation. Your consultant proposed further excavation of the tank pit to remove as much soil contamination as possible and take confirmatory samples. I explained that a groundwater monitoring well would be required, based on the condition of one of the tanks, and that water was present in the pit. On September 13, 1990, confirmatory samples were taken from the additional excavation, and these analyses indicate that hydrocarbon values did diminish.

Due to the benzene and TPH values, and the corroded condition of one of the tanks, Pacific Galvanizing is required to conduct a groundwater investigation to determine the extent of contamination associated with the underground storage tanks.

You are required to complete a workplan that provides information on how the subsurface investigation will proceed. Please submit this workplan to our office within 45 days of the date of this letter. Our office will be the lead agency overseeing the soil and groundwater investigation at this site. The San Francisco Bay Regional Water Quality Control Board (RWQCB) has delegated

Mr. Mike Huron
Pacific Galvanizing
April 10, 1991
Page 2

the handling of this case to our Division. We will be in contact with the RWQCB in order to provide you with guidance concerning the RWQCB's investigation requirements. However, please be aware that you are responsible for diligent actions to protect the waters of the State. If at any time free product is encountered, it must be removed. If your investigation indicates that the plume is migrating, interim remedial measures are to be taken to prevent any further migration.

A format for the workplan and items to address is outlined below.

I. INTRODUCTION

- A. Statement of Scope of Work
- B. Site location
- C. Background
- D. Site History

Provide a description of the historic site use and ownership information, type of business and associated activities that take place at the site, and provide a history of the use of the underground tank, its contents, and include the date of installation.

II. SITE DESCRIPTION

- A. Provide a map which shows streets, site buildings, underground tank locations, subsurface conduits and utilities, on-site and nearby wells, and nearby streams or water bodies.
- B. Provide a description of the hydrogeologic setting of the site and surrounding area. Include a description of any subsurface work previously done at the site.

III. PLAN FOR DETERMINING EXTENT OF SOIL CONTAMINATION ON SITE

- A. Describe how the extent of soil contamination associated with the former underground tank will be determined.
- B. Soil samples are to be analyzed by a California State Certified Laboratory for the appropriate constituents.

Mr. Mike Huron
Pacific Galvanizing
April 10, 1991
Page 3

IV. DETERMINATION OF GROUNDWATER QUALITY

- A. A minimum of three monitoring wells must be installed to determine the groundwater gradient. If the verified down-gradient location has been established, then complete gradient data must be submitted and one monitoring well will be required in the down-gradient direction.
- B. Monitoring wells shall be designed and constructed to be consistent with the RWQCB guidelines and to permit entrance of any free product into the wells. Filter pack and slot sizes for all wells should be based on particle analysis from each stratigraphic unit in at least one boring on the site and on the types of groundwater contaminants present. The well screen must be situated to intercept any floating product from both the highest and lowest ground water levels. All wells shall be surveyed to mean sea level to an established benchmark to 0.01 foot.
- C. Monitoring wells must be sampled for dissolved and floating constituents. Any free product is to be measured with an optical probe or by another method shown to have equivalent accuracy.
- D. A groundwater gradient map shall be developed for every water level data set. If the gradient fluctuates, water level measurements must continue to be made monthly until a gradient pattern is established.
- E. All monitoring wells must be sampled at least quarterly for one year. Free product thicknesses and water levels shall be measured in all wells for each sampling event before any purging or sampling activities begin. Groundwater levels and quality must be monitored quarterly for a minimum of one year, even if no contamination is identified. At this point, the case will be evaluated to determine if additional monitoring is necessary.
- F. Groundwater samples are to be analyzed by a California State Certified Laboratory for the appropriate constituents.

Mr. Mike Huron
Pacific Galvanizing
April 10, 1991
Page 4

V. INTERPRETATION OF HYDROGEOLOGIC DATA

Water level contour maps showing groundwater gradient direction and free and dissolved product plume definition maps of each contaminant constituent should be prepared routinely and submitted with other sampling results.

VI. SITE SAFETY PLAN

VII. REPORTING

- A. A technical report must be submitted, within 30 days of completion of the investigation, which presents and interprets the information generated during the initial subsurface site investigation. At a minimum, the report must include the following items: Site history information, boring and well construction logs, records of field observations and data, chain-of-custody forms, water level data, water level contour map showing groundwater gradient direction, contaminant plume maps, tabulations of soil and groundwater contaminant concentrations, status of soil contamination characterization, description of any remedial work performed, laboratory-originated analytical results for all soil and groundwater samples analyzed, a description on where non-hazardous contaminated wastes went, and any recommendations for additional investigative or remedial work.
- B. All reports and proposals must be signed by a California-Certified Engineering Geologist, California-Registered Geologist or a California-Registered Civil Engineer. A statement of qualifications should be included in all reports. Borehole and monitoring well installation and logging, and impact assessments will require the signature of such a professional.
- C. The technical report must be submitted with a cover letter from the responsible party and received in this office by the established due date. The letter must be signed by a principal executive officer or by an authorized representative of the company.

All proposals, reports and analytical results pertaining to this investigation and remediation must be sent to our office and to the RWQCB to the attention of Lester Feldman. The address is:

Mr. Mike Huron
Pacific Galvanizing
April 10, 1991
Page 5

Regional Water Quality Control Board
2101 Webster Street, Fifth Floor
Oakland, CA 94612

You should be aware that this Division is working in conjunction with the RWQCB and that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Any extensions of agreed upon time deadlines must be confirmed in writing by either this Division or the RWQCB.

Should you have any questions concerning the contents of this letter or the status of this case, please feel free to contact me at 415/271-4320.

Sincerely,

Cynthia Chapman

Cynthia Chapman
Hazardous Materials Specialist

c: Lester Feldman, RWQCB