



September 13, 2005

Mr. Jerry Wickham  
Alameda County Health Care Services Agency  
1131 Harbor Bay Parkway, Suite 250  
Alameda, California 94502-6577

RE: Response to ACHCSA's August 5, 2005 Comment Letter  
Fuel Leak Site Case No. RO0002532, Former Fleischmann's Yeast Facility  
921 98<sup>th</sup> Street, Oakland, California

Dear Mr. Wickham:

On behalf of Burns Philp & Company Limited, ACC Environmental Consultants, Inc. (ACC) has prepared this response to your August 5, 2005 Comment Letter prepared for Ms. Sally Snow at Burns Philp & Company Limited, Mr. Al Pelton at Dreisbach Industries, and Mr. Robert Ribbing at Fleischmann's Yeast. Please be advised that Fleischmann's Yeast was purchased by Burns Philp & Company Limited and is no longer a responsible party.

Responses are presented in table format. The intent of this response letter is: 1) clarify information previously submitted by ACC; 2) present new information obtained since the June 14, 2005 Additional Subsurface Investigation and Piezometer Installation Report (Report) was submitted to the Alameda County Health Care Services Agency (ACHCSA); 3) present additional rationale or opinion for statements made in the Report; and 4) respond to ACHCSA's comments to resolve any significant discrepancies.

Technical Comment	ACC Response
#1 - Perjury Statement	ACC requested a cover letter satisfying ACHCSA perjury statement requirements to be submitted with the revised report but Burns Philp refused due their contractual agreements with Dreisbach Industries to take over project oversight and remedial efforts.
#2 - Lack of References or Supporting Information	ACC submitted Figure 2 with the January 17, 2003 Investigation Report. Figure 2 was a scan of the original site plan provided by Fleischmann's Yeast during preparation of the Phase I Environmental Site Assessment (ESA) which illustrated the locations of the two gasoline underground storage tanks (USTs). No other information was available regarding the former USTs from any others sources during the preparation of the Phase I ESA.
#3 - Examples of Lack of References or Supporting Information	ACC provided additional information regarding the geophysical scan and exploratory trenching performed in the revised Report. The locations of the two original USTs and product dispensers have been depicted on all figures. Since the location of UST T1 was correct and the locations of the two product dispenser locations were correct, ACC assumed that the depicted location of UST T2 was also correct prior to advancing exploratory soil borings at that location.

Technical Comment	ACC Response
#4 - Description of Other Releases at the Site	This comment makes assumptions known now but which were not known during the first two soil boring investigations. Since ACC prepared the Phase I ESA, we were aware of the diesel tank removal work performed by IT Corporation circa 1996. The applicability of the diesel tank investigation and remediation work to our area of the site is open to interpretation. The primary goal of the subsurface characterization work summarized in the June 14, 2005 report was to further determine the degree and extent of residual petroleum hydrocarbons in soil and groundwater in the vicinity of the two former gasoline USTs located approximately 500 feet from the former fuel oil USTs.
#5 - Dispensers and Piping	The two product dispensers and product piping associated with Tank T1 were directly observed, and the two product dispensers were in the exact locations depicted on the Site Plan obtained during the Phase I ESA, and product piping leading from Tank T2's dispenser were correctly identified during the geophysical survey.
#6 - Formaldehyde UST	The formaldehyde tank was successfully removed under observation of the Oakland Fire Department and a no further action letter was prepared dated March 21, 2005. A copy of the letter is attached. The formaldehyde UST was not used from 1989 to 2002, was filled with water prior to being cleaned out during plant decommissioning activities in 2003, and was found to be constructed of intact 0.5-inch thick steel during removal.
#7 - Borings Adjacent to Tank T1	Exploratory soil borings B9 and B10 were advanced to further investigate apparently impacted soils at soil boring locations B1 and B2, not specifically located in relation to UST T1.
#8 - Piezometer Installation	The Report has been revised to include additional information about the installation, development, and sampling of the piezometers. Due to an apparent obstruction in piezometer P-2, a fourth piezometer (P-2R) was installed. Subsequent efforts cleared the obstruction in piezometer P-2 which now contains static groundwater.
#9 - Subsurface Conditions	The Report has been revised.
#10 - Analytical Results	Table 5 summarizes fuel oxygenate analytical data provided by the laboratory. Select soil and groundwater samples were analyzed for fuel oxygenates by EPA method 8260B but the laboratory reported only MTBE. Amended lab reports containing fuel oxygenate data have been included in the revised Report.
#11 - Groundwater Flow Direction	ACC will provide calculated gradients and groundwater flow direction from groundwater depth data obtained in the piezometers. Groundwater data obtained to date is inconclusive even with the installation of the fourth piezometer.
#12 - Groundwater Gradient and Aquifer Qualities	Boring logs cannot contain the minute detail observed during logging or conclusively demonstrate to a third party the reported interpretations and professional opinions gained through experience. The opinions expressed in the Report are those of two Professional Geologists and sometimes include observations made during previous investigation at the Site.

Technical Comment	ACC Response
#13 - Isoconcentration Contours	Despite the claims of the interpolation software developers, isoconcentration maps represent a simple interpretation of data between known points. These maps are typically inaccurate but are consistently requested by regulatory agencies. Previously, ACHCSA requested isoconcentration maps for this Site and even requested isoconcentration maps in soil. The discussion about the accuracy of the isoconcentration contours is analogous to the "uncertainties" section of a human health risk assessment.
#14 - Source Areas	The Report has been revised.
#15 - Lateral Extent of TPHg and BTEX in Soils	The Report has been revised or reviewed.
#16 - Lateral Extent of TPHg and BTEX in Groundwater	The Report has been revised or reviewed.
#17 - Vertical Extent of TPHg and BTEX in Groundwater	The Report has been revised or reviewed.
#18 - Risks and Volume of Contaminated Groundwater	The Report has been revised or reviewed.
#19 - Depths for Groundwater Grab Samples	Grab groundwater samples were collected from each borehole upon reaching total maximum depth in the estimated top four feet of encountered groundwater. Pertinent information is included on respective soil boring logs.
#20 - Site Figures	The difference between Figures 2 and 3 is that the former Figure 2 taken from the 2003 report shows the building before it was demolished in 2004 and Figure 3 shows the remaining concrete building pad after the building debris was mostly removed from the site.
#21 - Errors in Boring Logs	There are no boring logs for B21, 28, 29, 31, 32, 33, & 36. These soil borings were advanced with a hydropunch for purposes of collecting grab groundwater samples. Soil boring log B27 has been revised.
#22 - Appendices - Supporting Information	Additional information requested has been provided in the revised Report.
#23 - Well Survey	Well survey information will be provided in a separate report.
#24 - Utilities and Other Preferential Pathways	Utility information will be provided in a separate report.
#25 - Geotracker EDF Submittals	Geotracker will be updated with the revised Report within 14 days.
#26 - Request for Meeting	Dreisbach Industries would like to meet with the ACHCSA as soon as feasible to discuss interim remediation at the Site for purposes of receiving regulatory closure in regards to the former gasoline USTs.

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ACC General Comments

ACC would like to reiterate that site investigation and subsurface characterization was generally performed in a logical, progressive fashion based on the schedule and goals existing at the time. Initially, the Phase I ESA identified two suspect gasoline tanks. Site inspection indicated the product dispensers were located as depicted on the Fleischmann's site plan but no evidence of UST removal was indicated. ACC trenched across the depicted locations of the two suspect gasoline USTs to confirm if the tanks still existed and observed cut product/vent lines at one tank (T1) that had been bent back apparently by a backhoe. Evidence of the second UST T2 was not observed in the trench so ACC had the area of the two tanks scanned with a magnetometer. Product piping from the tank T2 product dispenser was noted in the correct position to within a few feet of the depicted location of tank T2, and no metallic anomalies indicative of a UST were noted. Following confirmation that the two gasoline tanks no longer existed and noting field evidence of gasoline impact in soil, ACC recommended exploratory soil borings to further characterize soil and groundwater impacts in the vicinity of the two former gasoline USTs.

Despite a number of requests, ACHCSA refused to meet with ACC and Fleischmann's Yeast during this period. Ms. Donna Drogos instructed ACC to wait for regulatory comment from Mr. Amir Gholami and regulatory feedback was inconsistent with the findings of subsurface investigation.

We believe the revised Report and information summarized in this response letter will clarify specific issues and facilitate evaluating the investigation data obtained to date. ACC is currently monitoring the four piezometers and will be providing a letter report of findings by September 20, 2005. We are available at your convenience to discuss previous work performed at the Site.

*"I declare, under penalty of perjury, that the information contained in this letter is true and correct to best of my knowledge and that no information has been withheld pertaining to the subject matter of this document."*

If you have any questions, please contact me at (510) 638-8400, extension 109 or email me at [ddement@accenv.com](mailto:ddement@accenv.com).

Sincerely,



David DeMent, RG, REA II  
Environmental Division Manager

cc: Ms. Sally Snow, Burns Philp & Company  
Mr. Al Pelton, Dreisbach Industries