ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

SENT 8-11-05

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

August 5, 2005

Robert Ribbing
Fleischmann's Yeast
240 Larkin Williams Industrial Court
Fenton, MO 63026

Allen Pelton
Dreisbach
2530 East Eleventh Street
P.O. Box 7509
Oakland, CA 94601-0509

Sally Snow
Burns Philp & Company Limited
Level 23 Pitt Street
Sydney NSW 2000
Australia

Subject: Fuel Leak Case No. RO0002532, Fleischmann's Yeast, 921 98th Avenue, Oakland, CA

Dear Mr. Ribbing, Mr. Pelton, and Ms. Snow:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the report entitled, "Additional Subsurface Investigation and Piezometer Installation Report," dated June 14, 2005, prepared on your behalf by ACC Environmental Consultants. We have found the referenced report to be incomplete and contain numerous deficiencies, many of which are described in the technical comments below. Due to these deficiencies, the lack of supporting information, and unsubstantiated statements and interpretations made throughout the report, ACEH finds the report unacceptable to evaluate site conditions. ACEH requests that you revise the report to include the additional requested items and address the deficiencies described below. **Please re-submit the report by September 9, 2005.**

TECHNICAL COMMENTS

1. **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.

2. **Section 2.0 - Lack of References or Supporting Information in Background Section.** Incomplete information is presented in the Background section of the report without reference or substantiation. The sources of historical information regarding the two former USTs and dispensers are to be described in order for the reader to assess the validity of the conclusions stated. If the sources of historical information are fully described in a Phase I Environmental Site Assessment, that document is to be referenced in the Background section of the "Additional Subsurface Investigation and Piezometer Installation Report," and provided to

ACEH as a reference document for the site. Two examples of the lack of references and supporting information are more fully discussed below in comment #3.

3. **Section 2.0 - Examples of Lack of References or Supporting Information.** Section 2.0 – Background, which describes efforts to locate the two former gasoline USTs, includes two examples of the lack of references or supporting information in the Background section. An exploratory excavation at the presumed former location of gasoline UST T1 is described as revealing "broken and cut product and vent line and engineered fill where soils should have been native silts and clays." The report does not include a location map or trench log to show the trench location, trench dimensions, types of materials observed along the sides and bottom of the excavation, description of the pipes (size, depths, and orientations), whether the broken and cut pipes were properly abandoned, whether any samples were collected, and whether any staining or odor was observed in the excavation. A second exploratory excavation apparently at the assumed location of UST T2 is simply described as "inconclusive." No references to previous documents or supporting information regarding the exploratory excavations are described in this background section. ACEH reviewed previous documents to attempt to locate supporting data for the excavations but did not find the information in previous reports. Subsurface investigation reports dated January 17, 2003 and September 2, 2003 contained the identical paragraphs used in Section 2.0 – Background of the June 14, 2005 report. A second example of the lack of references or supporting information in the Background Section is the description of a geophysical scan. The Background section describes the results from the geophysical scan in the following single sentence, "The results of a subsurface magnetometer survey were more conclusive and indicated that no metallic anomalies were located in the area of the former gasoline USTs." No reference or other information is provided to identify the area where the survey was conducted, the type of equipment used, and the reliability of the conclusions. If the results of the excavations and geophysical scan are described in separate existing documents, please reference the existing documents in the Background section and submit copies of the existing documents to ACEH. If existing documents have not been produced to document the excavations or geophysical scan, please use the field notes to properly document the field activity in an appendix to the revised "Additional Subsurface Investigation and Piezometer Installation Report."

4. **Section 2.0 - Description of Other Releases at the Site.** The Background section of the report must include a description of previous releases and all subsurface investigations conducted at the site. The Background section currently does not include a discussion of subsurface investigations conducted at the site for two 25,000-gallon diesel USTs. Subsurface investigations of leaks from two 25,000-gallon diesel USTs were conducted at the facility from 1990 through 1996 and the case was closed in 1997. The information derived from the previous UST case, including the installation of monitoring wells and assessment of hydraulic gradient at the site are relevant to this site investigation and must be included in the report. The hydraulic gradients measured during the previous UST investigation are briefly mentioned in Section 5.0 but the data appear to be ignored in estimating the hydraulic gradient for the site. In addition, the previous case closure for the two diesel USTs identified conditions that must be evaluated for the proposed land use change from commercial to residential use. Therefore, the contamination from the two former diesel USTs must be re-evaluated based on a change to residential land use. Please include this information and describe plans to re-evaluate these data in the revised report requested below. In addition,

please describe and include results from any other sampling activities or investigation conducted for other releases at the site.

5. **Section 2.0 - Dispensers and Piping.** Please provide some background information regarding how the former locations of the dispensers were determined. If the locations were determined by direct observation, please state what was observed and the time frame over which observations are available. This information is to be included in the revised report requested below.

6. **Section 2.1 - Formaldehyde UST.** The report does not present information to help assess whether the formaldehyde UST has leaked and whether the formaldehyde UST may be closed in place. Borings B7 and B8 were reported to be completed directly adjacent to the formaldehyde UST yet the purpose of these borings is unclear since no soil samples were collected from these borings and the single groundwater sample collected from boring B7 was analyzed only for TPHg, BTEX, and MTBE. It appears that no laboratory analytical data for formaldehyde was obtained from these two borings. If the formaldehyde UST is to be closed in place under permit to Oakland Fire Services Agency, an investigation to assess potential discharges from the formaldehyde UST and piping is required. If the formaldehyde UST will be closed in place under permit to Oakland Fire Services Agency, please submit a Work Plan to collect and analyze soil and groundwater samples in the vicinity of the formaldehyde UST that will allow an assessment of soil and groundwater conditions in the vicinity of the tank and piping. A description of the tank dimensions, construction, contents, age, and history of operations will be required in the Work Plan. Diagrams of all piping formerly leading to and from the tank must be presented. If the locations of piping are unknown, the Work Plan is to include a scope of work to identify and locate the piping.

7. **Section 2.2 - Borings Adjacent to Tank T1.** The text states that borings B1, B2, B9, and B10 were "advanced adjacent to and on each side of former gasoline UST T1." Tank T1 is shown on each of the site figures in a location northwest of these borings. Please determine whether the text or the figures are accurate and make the text and figures consistent in the revised report requested below.

8. **Unnumbered Section – Piezometer Installation.** The piezometers do not appear to have been installed according to the Work Plan, dated July 19, 2004 or the description in section 3.0 of the June 16, 2005 report. The text in section 3.0 indicates that the borings were continuously-cored and advanced to a depth of approximately 5 feet into the water-bearing zone." The second to last sentence in the same paragraph states that soil samples were collected for soil classification at 5-foot intervals, at lithologic changes, and at the soil/groundwater samples. Therefore, it is not clear whether the borings were continuously cored or sampled at selected intervals. The piezometers were installed at depths of 18, 24, and 12 feet bgs, respectively. The boring logs for borings B23 (P-1) and B-30A (P-2) indicate groundwater was not encountered in the borings. The construction diagrams for the piezometers show a grout seal installed directly over a factory-packed filter pack. Please clarify if this was the actual construction used. If so, please describe in the revised report requested below, why this method was used and what effects this may have on the filter pack and sample quality. In addition, please describe how these temporary piezometers have been or will be abandoned.

9. **Section 4.1 – Subsurface Conditions.** The sixth sentence in this section indicates, "sand content began to increase with depth and a saturated clayey and/or sand was observed in soil borings B22, B27, B30A, B34, and B35." Please correct this statement to identify the soil types observed in the soil borings. In addition, cross sections are to be added to illustrate the lateral and vertical extent of soil layers, where groundwater was first encountered in borings and the static water levels, observations of free product, staining, and odor, and sample locations and results. Please make these additions and changes in the revised report requested below.

10. **Section 4.2 – Analytical Results.** The work plan for this investigation, dated July 19, 2004 stated that "At a minimum, one soil sample from collected in each of the soil borings B@@, B23, and B24, and grab groundwater samples collected from B25 and B27, will be analyzed for TPHg, BTEX, MTBE, and all fuel oxygenates.: Analytical results for fuel oxygenates other than MTBE do not appear to be presented in the report. Please present the analytical results for fuel oxygenates for the specified samples in the revised report requested below or provide an explanation as to why these analyses were not performed. No analyses have been conducted for lead scavengers at the site. Please identify this as a data gap in the revised report requested below or provide the rationale for not conducting analyses for lead scavengers.

11. **Section 5.0 - Groundwater Flow Direction.** Investigation of the site has apparently been conducted based on an assumption that the groundwater flow direction is to the northwest. Section 5.0 (Discussion) of the report states that, "the inferred groundwater flow direction is reported to be west – northwest in the vicinity of the Site, which is consistent with regional topography." No reference or other information is provided to indicate in what document the groundwater flow direction is "reported to be west-northwest." No discussion of the regional hydrogeologic setting is included in the report. Based on groundwater monitoring conducted from 1992 to 1996 for a leaking UST investigation in the northern portion of the site, the hydraulic gradient at the site varies from southwest to west (IT Corporation, 1996. "Site Closure Recommendation Report"). Given that hydraulic gradient data are available for 921 98th Avenue, it is not clear why the hydraulic gradient would be inferred to be to the northwest. The discussion of hydraulic gradient requires revision throughout the revised report requested below.

12. **Section 5.2 – Statement Regarding Groundwater Gradient and Aquifer Qualities.** The last sentence in the second paragraph states that, "Due to relatively poor aquifer qualities in shallow water-bearing zones and a relatively shallow groundwater gradient, migration in groundwater is typically defined more by diffusion that groundwater flow direction." This statement is made without supporting data or foundation. Moreover, this statement is not consistent with site data and basic hydrogeologic principles. Water-bearing zones that are capable of transmitting groundwater and dissolved contaminants by advective flow are described in the boring logs. An example is the boring log for the deepest boring at the site, B22. As shown on the boring log for B22, a silty sand was encountered from approximately 16 feet bgs to approximately 28 feet bgs. Groundwater was encountered at a depth of 18 feet bgs in the boring. Therefore, it is difficult to understand why the report would consider diffusion to be the predominant mechanism for contaminant movement when a silty sand unit with a saturated thickness of approximately 10 feet was encountered in the subsurface. The last sentence in the second paragraph of Section 5.2 is to be deleted in the revised report requested below.

13. **Section 5.2 – Third Paragraph, Isoconcentration Contours.** It is not clear why isoconcentration contours for TPHg and benzene that ACC believes to be inaccurate and contradict the discussion in the text are presented on Figures 8 and 9. In addition, it is not clear why the isoconcentration contours are not considered accurate.

14. **Section 5.2 – Source Areas.** Please revise the last sentence in this section to more clearly discuss the lateral extent of groundwater contamination.

15. **Section 6.0 – Conclusion Regarding Lateral Extent of TPHg and BTEX in Soils.** The second bulleted conclusion states that, "Residual gasoline impacts appear to be present in fine-grained soils primarily between 8 feet to 12 feet bgs in B34 and B35...residual TPHg and BTEX concentrations decrease to nondetect in soil borings B34 and B35 at 20 and 16 feet bgs, respectively." This is another example of a conclusion that is not supported by fact and in this case, is misleading. Cursory review of the boring log for B34 shows that "black oil material,' was observed in a gravelly clay layer below 16 feet bgs. Review of the boring log for boring B35 shows that a "strong TPH odor," was observed in two clayey gravel layers at depths of approximately 12 to 13.5 feet bgs and 16 to 18 feet bgs, respectively. Based on these descriptions from the boring logs, the contamination does not appear to be "residual impacts", limited to depths primarily between 8 to 12 feet, or limited to fine-grained soils as the stated in the conclusion. This conclusion is to be deleted or modified in the revised report requested below.

16. **Section 6.0 – Conclusion Regarding Lateral Extent of TPHg and BTEX in Groundwater.** The third bulleted conclusion states that "Residual TPHg and BTEX gasoline impacts are present in first-encountered groundwater but these impacts appear to be localized in the vicinity of and downgradient of the two former gasoline USTs T1 and T2, the fuel dispenser." Based on previous groundwater monitoring conducted at the site, the downgradient direction is west to southwest (IT Corporation 1996). Since no groundwater samples have been collected southwest of the USTs, the lateral extent of TPHg and BTEX in groundwater has not been determined. This conclusion is to be deleted or modified in the revised report requested below.

17. **Section 6.0 – Conclusions Regarding Vertical Extent of TPHg and BTEX in Groundwater.** The fourth bulleted conclusion states that "Residual gasoline impacts are present in first-encountered groundwater in soil borings B34 and B35... but these groundwater impacts appear to be localized in thin permeable zones observed in these two soil borings." No depth-discrete groundwater sampling was conducted in this boring to support this conclusion. It is not clear how this conclusion was reached based on one groundwater sample collected from an unspecified depth. This conclusion is to be deleted or modified in the revised report requested below.

18. **Section 6.0 – Conclusion Regarding Risks and Volume of Contaminated Groundwater.** The conclusions in this seventh bulleted item are presented without proper qualification or are incorrect. The conclusion refers to "minimal potential human health risk due to its location in relatively shallow groundwater on a commercial facility," yet discusses residential use of the property later in the report. This conclusion also refers to "the lack of any potential downgradient or onsite receptors," but does not correctly identify the downgradient direction for the site, fails to discuss an on-site water well, and does not consider future residents of the

site to be potential receptors for volatilization from shallow groundwater. The conclusion refers to "the estimated small volume of impacted groundwater," without an actual volume estimate, without qualification, and without having fully characterized the extent of petroleum hydrocarbons in groundwater. The last item in the conclusion refers to 'the relatively low to non-detectable concentrations of benzene." This conclusion is generally true with the exception of the detection of 1,500 µg/L of benzene in the grab groundwater sample from boring B25. This conclusion is to be deleted or modified in the revised report requested below.

19. **Table 4 - Depths for Groundwater Grab Samples.** The report does not indicate the depth at which groundwater grab samples were collected. Table 4 is to be revised to show the depth at which each groundwater grab sample was collected. The depth of groundwater grab samples must also be indicated on boring logs and cross sections in the revised report requested below.

20. **Site Figures.** The current Site Plan provides insufficient detail to clearly depict site conditions. Please show additional details on the Site Plan such as sidewalks, streets, railroad tracks, the former locations of buildings and other structures, the locations of product and vent lines, and the location of the formaldehyde UST. In addition, a figure that shows a larger area of the facility at 921 98th Avenue and potentially the surrounding area is needed to show the two former diesel USTs in the northern portion of the site, the location of the on-site water well, former buildings and operations, potential off-site receptors, and any other features relevant to this investigation. The building outlines appear to be different between Figures 2 and 3. Please correct the building outline or clarify if Figures 2 and 3 depict the configuration of the building at different points in time. Two borings are labeled B35 on Figures 3 and 4; please correct the figures in the revised report.

21. **Errors in Boring Logs.** No boring logs were included in the report for borings B28, B29, B31, B32, B33, and B36. The boring log for B27 references samples and PID readings from boring B26. Please include all boring logs and correct the boring log for B27 in the revised report requested below.

22. **Appendices – Supporting Information.** The appendices are to include field sheets that describe the methods used and parameters measured during piezometer development and sampling. Please also include copies of the permits obtained for borings and piezometer installation in the revised report requested below.

23. **Well Survey.** We request that you locate all wells (monitoring and production wells: active, inactive, standby, decommissioned, abandoned and dewatering, drainage and cathodic protection wells) within 2,000 ft of the subject site. We recommend that you obtain well information from both Alameda County Public Works Agency and the State of California Department of Water Resources, at a minimum. Submittal of maps showing the location of all wells identified in your study, and the use of tables to report the data (well construction, date installed, location, etc.) collected as part of your survey are required. Please present your results in the revised report requested below.

24. **Utilities and Other Preferential Pathways.** The potential for utility lines and trenches (including sewers, storm drains, pipelines, and trench backfill within the vicinity of the site to act as preferential pathways for contaminant movement is to be evaluated. The depth of

utilities is to be compared to current and potential future groundwater elevations to assess whether utilities are likely or potential preferential pathways for contaminant movement. The locations and depths for utilities located within proximity to the site are to be plotted on a site map. Any sensitive receptors in the vicinity of the site are to be identified and their locations plotted on a map of the site vicinity. Please present these results in the revised report requested below.

25. **GeoTracker EDF Submittals.** Pursuant to CCR Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. Additionally, beginning January 1, 2002, all permanent monitoring points utilized to collected groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude to sub-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB GeoTracker system via the internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports is also required in Geotracker (in PDF format). Please upload all analytical data (collected on or after September 1, 2001), to the SWRCB's GeoTracker database website in accordance with the above-cited regulation.

26. **Request for Meeting.** ACEH is willing to meet to discuss specific issues regarding the site. However, we suggest that the Additional Subsurface Investigation and Piezometer Installation Report be revised prior to meeting in order to more effectively discuss current site conditions.

TECHNICAL REPORT REQUEST

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

- **September 9, 2005** – Revised Additional Subsurface Investigation and Piezometer Installation Report

- **October 3, 2005** – Work Plan for Investigation of Formaldehyde UST

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.

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

ELECTRONIC SUBMITTAL OF REPORTS

The Alameda County Environmental Cleanup Oversight Programs (LOP and Toxics) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be relied upon for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is separate from and in 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 groundwater cleanup programs. For several years, parties responsible 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 is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

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: Alameda County Environmental Oversight Programs (LOP and SLIC) Electronic Report Upload (ftp) Instructions

cc: Leroy Griffin
City of Oakland Fire Department
250 Frank Ogawa Plaza, Suite 3341
Oakland, CA 94612

David DeMent
ACC Environmental Consultants, Inc.
7977 Capwell Drive, Suite 100
Oakland, CA 94621

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)
Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. This e-government initiative is aimed at making our programs more effective and efficient. The electronic copy is intended to replace the need for a paper copy and is expected to be relied upon for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- Entire report including cover letter must be submitted as **a single portable document format (PDF) with no password protection.** (If you cannot submit in PDF format, please check with us to see if we can accommodate your report format).
- 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 **should** be included and **must** have either original or electronic signature. Alternatively, the paper copy of the signature page and perjury statement can be mailed separately.
- **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.** If you cannot comply with this you may continue to submit paper documents.
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:
  RO#_Report Name_Year-Month-Date
  (e.g., RO#5555_WorkPlan_2005-06-14)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

Submission Instructions

1. Obtain User Name and Password:
   - Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
     a) Send an e-mail to dehloptoxic@acgov.org
        or
     b) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
   - 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.**
   - Note: Both the User Name and Password are Case Sensitive.

2. Upload Files to the ftp Site
   a) Using Internet Explorer (IE4+) or equivalent browser, go to ftp://alcoftp1.acgov.org
   b) Click on File, then on Login As.
   c) Enter your User Name and Password.
      Note: Both are Case Sensitive.
   d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
   e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.

3. Send E-mail Notifications to the Environmental Cleanup Oversight Programs
   a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
   b) Copy your Caseworker on the e-mail
      - Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org
        (e.g., firstname.lastname@acgov.org)
   c) The subject line of the e-mail must start with the RO# followed by **Report Upload.**
      (e.g., Subject: RO1234 Report Upload)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

Sent 03-29-05

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway
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(510) 567-6700
Fax (510) 337-9335

March 28, 2005

RO0002532

Mr. Robert Ribbing
Fleischmann's Yeast
240 Larkin Williams Industrial Court
Fenton MO, 63026

Mr. Stephan Vanni
Fleischmann's Yeast
921 98Th Ave.
Oakland, CA 94603

Re: Fuel Leak Investigation, Site No. RO0002532, Fleischmann's Yeast, 921 98Th Ave., Oakland, CA 94603

Dear Mr. Ribbing and Mr. Vanni:

Alameda County Environmental Health (ACEH) staff has reviewed the Work Pan for Additional Site Characterization Report, dated July 19, 2004, prepared by Mr. David R. Dement of ACC Environmental Consultants (ACC). We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

Source Characterization-

1- Please perform sampling and analysis to depths sufficient to define the vertical extent of soil contamination and determine if submerged NAPL is present in source areas at your site.

2- The area north and northeast of Tank T1 needs to be investigated since this area appears to be upgradient of the source but the soil is contaminated. Please investigate and identify the source of this contamination.

3- B26, B27, B28, B33, B32 seems to be excessively away (125 to 200 feet) from the source area and would not result in any valuable information. Neither would it seem to further complement the "site conceptual model "discussed below.

4- We recommend that Boring B29 be placed Southwest of B30 to better define the area as a line of intercept.

5- This office does not have analytical results from the B3 boring area. Please collect a soil sample from this area as well.

6- Please ensure that all soil samples are to be collected at every five feet, change in lithology, discoloration, or areas where warranted (using Hnu and or other proper equipment) up to the depth of 25 feet. This includes collecting discrete soil samples using direct push technology below the groundwater level. This step will also help in drawing of geological cross sections of the site. Enclosed for your review please find a copy of the article "Three-Dimensional Sampling, by Gary A. Robbins, a professor at University of Connecticut".

Dissolved Plume(S)-

7- We request that you also incorporate a depth discrete groundwater sampling to reflect concentrations at different depths rather than an average concentration derived at a typical monitoring well.

8- We recommend that you consider the use of temporary piezometers to determine the groundwater gradient.

9- Please develop a site conceptual model (SCM) and your workplan should attempt to further refine/complete the developed SCM.

Formaldehyde UST-

10- We understand that Oakland Fire Services Agency had requested the removal of the UST and subsequent soil and groundwater analyses be performed. Please provide documentation on the formaldehyde UST regarding this issue and include this information and your conclusions and recommendations regarding your results in the workplan requested below

TECHNICAL REPORT REQUEST

Please submit the following technical reports to ACEH (Attention: Amir K. Gholami):

April 11, 2005	Revised sampling location map
May 28, 2005	Soil and water report

If you have any questions and or concerns, please call me at 510-567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. David DeMent, A.C.C. Environmental Consultants, 7977 Capwell Drive, Suite 100, Oakland, CA94621
D. Drogos, A. Gholami

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

SENT 6-9-04

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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(510) 567-6700
Fax (510) 337-9335

June 9, 2004

RO0002532

Mr. Stephan Vanni
Fleischmann's Yeast
921 98th Ave.
Oakland, CA 94603

Re: **Fuel Leak Investigation, Site No. RO0002532, Fleischmann's Yeast, 921 98Th Ave., Oakland, CA 94603**

Dear Mr. Vanni:

Alameda County Environmental Health (ACEH) staff has reviewed the Additional Subsurface Investigation Report, dated September 2, 2003," and "Case Closure Summary, Dated December 12, 2003", prepared by ACC Environmental Consultants (ACC). Based on our review, additional work is necessary to progress to case closure. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below:

TECHNICAL COMMENTS

- **Source Characterization-** The vertical extent of contamination in the source areas at your site has not been adequately defined. Up to 2,500 ppm TPHg and 23 ppm Benzene have been detected in soil at depths of 12 feet bgs with the vertical extent of contamination left undefined. Little to no soil analyses occurred in the dispenser source areas even though there were field observations of gasoline odors and discoloration during drilling. These boring also detected high concentrations of dissolved contaminants. Additional sampling and analysis to depths sufficient to define the vertical extent of soil contamination, determine if submerged NAPL is present, etc., is needed in source areas at your site. Please analyze your soil samples for TPHg, BTEX, MTBE, EDB, and EDC. Include your proposal for this work in the workplan requested below.

- **Dissolved Plume (S)-** The lateral and vertical extent of dissolved contamination at your site is undefined. Up to 72,000 ppb TPHg and 1,100 ppb Benzene have been detected in source area groundwater. Groundwater from two borings in assumed down-gradient locations were sampled and determined by ACC to delineate the extent of the dissolved plumes. Further, ACC asserts that the water bearing zones beneath the site exhibit poor aquifer qualities and a flat estimated groundwater gradient. However, stabilized depth to groundwater has not been established at your site and groundwater gradient is unknown. ACC has not collected data sufficient to support their interpretations of the hydrogeology at the site.

  We request that you adequately characterize the dissolved plumes associated with your site and establish groundwater gradient. We recommend that you install temporary piezometers and monitor them over several days to establish gradient. We request that you analyze groundwater samples (and soil samples, as needed) from appropriate borings for BTEX, MTBE, EDB, and EDC by EPA Method 8260, and TPHg. Additional sampling locations may be needed to characterize your plume. Include your proposal for this work in the workplan requested below.

- **Formaldehyde UST-** please provide documentation on the formaldehyde UST removal and subsequent soil and groundwater analyses performed at the site. Include this information and your conclusions and recommendations regarding your results in the workplan requested below. ACEH's case file does not include reports regarding this UST. Please include any reports related to this UST as an attachment to your workplan.

TECHNICAL REPORT REQUEST

Please submit the following technical reports to ACEH (Attention: Amir K. Gholami):

July 9, 2004 Work Plan

Should you have any questions, please call me at 510-567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. David DeMent, A.C.C. Environmental Consultants, 7977 Capwell Drive, Suite 100, Oakland, CA94621
A. Levi, D. Drogos, A. Gholami

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division

1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577
(510)567-6700

R0517
✓ R02532

StID 3946

September 23, 1994

Mr. Dan Sylvester
Fleichmann Yeast
921 98th Ave
Oakland, CA 94603

RE: Sampling Frequency at Fleichmann's Yeast Plant, 921 98th Ave, Oakland 94603

Dear Mr. Sylvester:

I have completed review of Environmental Science & Engineering's September 1994 Combined Remediation System and Groundwater Monitoring Report for the above referenced site. It appears 133 gallons of DNAPLs have been recovered by June 7, 1994. And until DNAPL thickness increases, recovery efforts will be suspended. This is acceptable as long as the DANPL thickness is monitored quarterly.

At this time, a reduced sampling frequency schedule may be implemented for the following wells:

1. Wells MW-1 and MW-4 to be sampled annually, and

2. Well MW-2 to be sampled bi-annually.

Quarterly sampling of well MW-3 should continue. Be advised, if groundwater continues to flows toward the south, southwest, another monitoring well may be required on the other side of Building 12 in the future.

Please note, our office has moved to 1131 Harbor Bay Parkway, Alameda, CA 94502-6577. If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

cc: Maqbool Qadir, ESE, 4090 Nelson Ave, #J, Concord 94520
files

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ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

√RO2532
RO517

StID 3946

November 24, 1993

Mr. Dan Sylvester
Fleischmanns Yeast
921 98th Ave
Oakland, CA 94603

Subject: Groundwater Remediation at 921 98th Ave, Oakland 94603

Dear Mr. Sylvester:

I have completed review of IT Corporation's (IT) September 1993 Sampling of Monitoring Wells report for the above referenced site. Groundwater samples did not detect contaminants in wells MW-1, MW-2 or MW-4. However at the bottom of well MW-3 was four inches of a dense, non-aqueous phase liquid (D-NAPL), resembling Bunker C oil. IT believes this to be weathered No. 2 or No. 6 diesel fuel, which was previously contained in the former tanks.

The groundwater extraction system in place has not been in operation. It was believed that groundwater was below the French drain system and groundwater extraction would be postponed until water levels rise. Water level data show depth to water has ranged from about 8-12 feet since January 1991 to the present. Clearly, water extraction would have been possible. If this remediation system will not effectively removal fuel products from groundwater, then other feasible alternatives for cleanup of groundwater must be evaluated. A workplan proposal for this investigation is due **within 45 days of the date of this letter.**

Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this agency.

Should you have any questions about the content of this letter, please contact me at (510) 271-4530.

eva chu
Hazardous Materials Specialist

cc: Sydney Geels, IT Corp, 4585 Pacheco Bl., Martinez, CA 94553
files

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ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

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StID 3946

October 3, 1992

Dan Sylvester
Fleischmann's Yeast
921 98th Ave
Oakland, CA 94603

Subject: Quarterly Reports for 921 98th Ave., Oakland 94603

Dear Mr. Sylvester:

This office has reviewed the file for the above referenced site. When two underground storage tanks (USTs) were removed in August 1990, floating product was in the excavation pit. Soil samples exhibited up to 43,550 ppm TOG and 6,760 ppm TPH-D, confirming an unauthorized release of petroleum hydrocarbons had occurred at this site, impacting soil and groundwater.

To delineate the extent of soil and groundwater contamination, a total of ten soil borings were advanced, of which four were converted to monitoring wells. Soil analysis from SB-6 exhibited 1,700 ppm TPH-D at 10' below ground surface. Additional over-excavation was not done at this time. The UST pit was lined with drain rocks, to facilitate groundwater extraction, and subsequently backfilled. A report dated January 1991, prepared by IT Corporation, made reference to the installation of an extraction well in November 1990.

To date we are not in receipt of any reports documenting the extraction well design/installation and groundwater remediation efforts, if any. At this time, you are directed to submit to this office, **within 30 days** of the date of this letter, all reports documenting field work performed since and including November 1990. Include pump tests, capture zones, water analyzes, etc. Copies of all reports should also be sent to Mr. Richard Hiett of the San Francisco Regional Water Quality Control Board (RWQCB).

Please be advised that Title 23 of the California Code of Regulations (23CCR), Section 2652(d), requires the owner or operator of an UST facility to submit reports <u>every three months</u>, or at a more frequent interval as specified by the local agency or regional water board, until investigation and cleanup are complete. In addition, the California Health and Safety Code (CHSC), Section 25298, states that underground storage tank closure is incomplete until the responsible party characterizes and remediates the contamination resulting from product discharge.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

Should you have any questions about the content of this letter, please contact me at (510) 271-4530.

Sincerely,

Eva Chu
Hazardous Materials Specialist

cc: Rich Hiett, RWQCB
Mark Thomson, Alameda County District Attorney's Office
Edgar Howell/files

fleisch

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

R02532
R0517

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

March 21, 1991

Mr. Dan Sylvester
Fleischmann's Yeast, Inc.
921 98th Avenue
Oakland, CA 94603

Dear Mr. Sylvester:

I have discussed your request to reuse treated groundwater in the cooling towers with Rich Hiett of the RWQCB. According to your letter dated February 27, 1991, you proposed to take the water from the tank excavation and from groundwater recovered from the french drain system, send it through a carbon adsorption system, and then reuse it in the cooling towers. The letter also indicates that sampling will occur before and after treatment. Based on the plan of action proposed in your letter, this is acceptable to both the RWQCB and our office.

If you have any questions, please call me at 415/271-4320.

Sincerely,

Cynthia Chapman

Cynthia Chapman
Hazardous Materials Specialist

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Director

V R02532
R0517

Telephone Number: (415)

March 26, 1990

Mr. Dan Sylvester
Fleischmann Yeast
921-98th Ave.
Oakland, CA 94603

Dear Mr. Sylvester:

Per your request of Cynthia Chapman of our office, we are enclosing three copies of the Alameda County underground closure plans. According to your conversation with Cynthia Chapman, one of your tanks failed the tank test, and you are currently considering removing the tanks and using some alternative method for a back-up supply source. Please send us a copy of the tank test results, and the completed closure plan or plan to address the tank test results within 30 days. If you have any questions, please call Cynthia Chapman at 415/271-4320.

Sincerely,

Edgar B Howell

Edgar B. Howell, III
Acting Chief, Hazardous Materials

EBH:CAC:cc

enclosures

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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√R02532

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

February 7, 1990

Mr. Dan Sylvester
Fleischmann's Yeast
921 - 98th Ave.
Oakland, CA 94603

Dear Mr. Sylvester:

Enclosed is a list of some of the tank testers in the area that perform integrity testing. Please note that the company that performs the tank testing must be licensed by the state (as of January 1, 1990) to perform these tests.

Please submit a tank integrity report on the fuel oil tanks within 45 days from the date of this letter. If you have any questions, please call Cynthia Chapman, Hazardous Materials Specialist, at 415/271-4320.

Sincerely,

Edgar B. Howell III
Acting Chief, HazMat Div.

CC:mam

Enclosure