

**From:** Roe, Dilan, Env. Health  
**To:** ["Cullen. Pat@Waterboards"](mailto:Cullen.Pat@Waterboards)  
**Cc:** [Drogos. Donna. Env. Health](mailto:Drogos.Donna.Env.Health)  
**Subject:** RE: EARTHGRAINS BAKING COMPANY (T0600177342) CASE #: R00002569 CUF Claim # 4424  
**Date:** Thursday, August 08, 2013 3:51:00 PM

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Hi Pat:

Thank you for the opportunity to provide comments on the subject site. Alameda County Environmental Health's (ACEH) review of the case files indicates the site fails to meet the Low Threat Closure Policy Media Specific Criteria for Groundwater and is not supported by a conceptual site model that addresses potential contamination in a shallow water bearing zone and free product migration in utility trenches. Total petroleum hydrocarbon as diesel (TPHd) contamination has been detected in offsite soil samples collected at 8 to 10 feet below ground surface (bgs) in borings located within the adjacent downgradient King Street at concentrations indicative of free product migration in accordance with the SWRCB's Technical Justification for Vapor Intrusion Media-Specific Criteria document (350 mg/kg in E-45 @ 10 feet bgs, 1800 mg/kg in E-46 at 10 feet bgs, and 560 mg/kg in E-49 at 8.5 feet bgs). These borings are located near the source area and along the approximate alignments of the storm drain and sanitary sewer in King Street. Soil and shallow groundwater impacts remain uncharacterized to the west (or downgradient) of these borings. According to site documents, the storm sewer along King Street flows north and intersects a second storm sewer that travels west to the Brooklyn Basin. Therefore, potential impacts to surface water due to petroleum migration along preferential pathways remains undefined.

In 2010 excavation activities were conducted to remove source area soil to a depth of approximately 11 feet bgs, however significant TPHd contamination remains in off-site soil. The existing groundwater monitoring well network at the site consists of four on-site groundwater monitoring wells (designated as MW-101, MW-102, MW-103, and MW-104) installed in 2009 to depths of 25 to 28 feet bgs. Wells MW-1 and MW-102 are located downgradient of the source area excavated in 2010 at the western edge of the site and are screened from 18 to 28 feet bgs. Depth to water in these wells ranges from approximately 7 to 9 feet bgs and thus are indicative of confined conditions in the water bearing units across the screened interval. A review of the boring log for well MW-102 indicates an unmonitored sand interval at approximately 9 feet bgs or at approximately the same depth as the soil contamination detected in the nearby borings E-45, E-46 and E-49 referenced above. Wells MW-103 and MW-104 are located upgradient of the excavated source areas and are screened from 10 to 25 feet bgs. Depth to water in these wells has ranged from approximately 8 to 9 feet bgs and although the depths to water have been slightly higher than the screen interval they are within the sand pack. The boring log for MW-3 indicates a sandy (wet) unit at approximately 9 feet bgs the same depth as in MW-102.

A review of recent groundwater sample analytical results and groundwater flow data from the current groundwater monitoring wells indicates the extent of dissolved phase hydrocarbons in the deeper water-bearing unit appears adequately characterized at this time. However, since the zone of contamination that was remediated in 2010 was shallow (depths of approximately 11 feet), ACEH remains concerned that a shallow water-bearing unit continues to be unmonitored as the depths of the existing site wells do not appear to intersect this first water bearing zone, but rather

a second deeper water bearing zone. Based on residual soil and groundwater analytical data, it appears appropriate to install shallow monitoring wells to verify the effectiveness of the source removal activities and delineate off-site soil and groundwater impacts to the west of the site.

Thank-you,

**Dilan Roe, P.E.**

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PDF copies of case files can be reviewed/downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>

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**From:** Cullen, Pat@Waterboards [mailto:Pat.Cullen@waterboards.ca.gov]

**Sent:** Tuesday, July 30, 2013 8:59 AM

**To:** Roe, Dilan, Env. Health

**Subject:** EARTHGRAINS BAKING COMPANY (T0600177342) CASE #: RO0002569 CUF Claim # 4424

Good morning Dilan

As you are aware the State Board staff has been tasked (LTCP Implementation Plan Resolution 2012-0062) to review all cases where the regulatory agency has denied a request by a responsible party for case closure pursuant to the LTCP and propose case closure, as appropriate within 6 months of closure denial.

The subject site was denied closure by your agency on April 24, 2013. We are in the process of reviewing the case as directed. If found to meet the LTCP criteria we will proceed with case closure. If you have additional comments that you would like to add to your agencies denial, please forward them to me so we can address them.

Thanks in advance

Pat G. Cullen

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