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*8:14 am, Oct 09, 2012*

Alameda County  
Environmental Health

08 October 2012

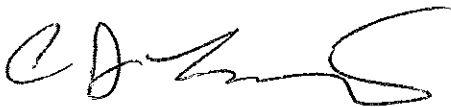
Mr. Jerry Wickham  
Alameda County Health Care Services Agency  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502

Subject:       Lucasey Manufacturing  
                  2744 East 11<sup>th</sup> Street  
                  Oakland, CA 94601  
                  RO0002902

Dear Mr. Wickham:

As the legally authorized representative of the above-referenced project location, I have reviewed the LOW-THREAT CLOSURE EVALUATION (October 2012) prepared by my consultant of record, ERM. I declare, under penalty of perjury, that the information and/or recommendations contained in this report are true and correct to the best of my knowledge.

Sincerely,



Mr. Charles Lucasey

**Environmental  
Resources  
Management**

1277 Treat Boulevard  
Suite 500  
Walnut Creek, CA 94597  
(925) 946-0455  
(925) 946-9968 (fax)

8 October 2012

Mr. Jerry Wickham

Mr. Jerry Wickham  
Alameda County Environmental Health (ACEH)  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502



**Subject: Corrective Action Plan**  
Lucasey Site - 2744 East 11<sup>th</sup> Street, Oakland  
SLIC Case RO0002902

Dear Mr. Wickham:

ERM-West, Inc. (ERM) submitted a Corrective Action Plan (CAP) for the Lucasey site on 7 April 2011. Based on discussions with you, ERM submitted a supplemental Human Health Risk Assessment/Evaluation (HHRA) (2 March 2012). This assessment focused on determining if residual concentrations of total petroleum hydrocarbons in soil vapor and groundwater in offsite locations presented potential health risks to current and future potential human health receptors.


Subsequent to submittal of these documents, the State Water Resources Control Board adopted a statewide Low-Threat Closure Policy (1 May 2012) that applies to petroleum underground storage tank sites. This policy is a state policy for water quality control and applies to all petroleum UST sites subject to Chapter 6.7 of Division 20 of the Health and Safety Code and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations. The term "regulatory agencies" in this policy means the State Water Board, Regional Water Quality Control Boards (Regional Water Boards) and local agencies authorized to implement Health and Safety Code section 25296.10.

ERM has evaluated the Lucasey Site according to criteria in the Low Threat Closure Policy and has determined that it meets the general and media-specific criteria described in this policy and therefore poses a low threat to human health, safety or the environment and is appropriate for closure pursuant to Health and Safety Code section 25296.10. A brief

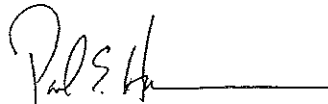
summary of the general and media-specific criteria analysis is presented in Attachment A. Previous reports submitted to the ACEH contain the detailed supporting information. Our client is anxious to resolve environmental issues and eagerly awaits your review of the submitted documents.

Please direct any comments or questions to John Moe at (925) 482-3240. Thank you for your consideration.

Sincerely,



John Moe  
*Project Manager*



Paul Hausmann  
*Partner-in-Charge*

cc: Bruce Flushman  
Scott Rickman  
Chuck Lucasey



*ATTACHMENT A*

## **General Criteria**

**A: The unauthorized release is located within the service area of a public water system.**

Water in the area is provided by EBMUD.

**B: The unauthorized release consists only of petroleum.**

Results of soil, groundwater and soil vapor samples are discussed in Section 2.0 of the CAP and tabulated in Tables 1, 2 and 3 of the CAP. The release consists only of petroleum.

**C: The unauthorized ("primary") release from the UST system has been stopped.**

The release is presumed to be associated with an underground tank that was shown on historical maps of the Site. The tank has not been located, however extensive borings in the former tank location were advanced, with no evidence of the tank still being in place. Sampling conducted previously at the Site reported evidence of "product", however more current sampling detected minimal or no product in soil samples and monitoring wells both in the area of the tank and further downgradient.

**D: Free product has been removed to the maximum extent practicable.**

As discussed above and documented in detail in the CAP, minimal or no free product is present in soil and groundwater at and downgradient of the Site. This is based on nine months of monitoring of all existing monitoring wells.

**E: A conceptual site model has been developed.**

The CAP contains information documenting the Conceptual Site Model of the Site.

**F: Secondary source removal has been addressed.**

There is no evidence indicating petroleum-impacted soil, free product, or groundwater is acting as a long-term source releasing contamination to the surrounding area.

**G: Soil or groundwater has been tested for MTBE and results reported in accordance with Health and Safety Code section 25296.15.**

Soil and groundwater samples have been tested for MTBE. Results are summarized in tables 1 and 2 of the CAP.

**H: Nuisance as defined by Water Code section 13050 does not exist at the site.**

Nuisance conditions are addressed in Section 3.0 of the CAP. The Site is a paved, industrial facility, therefore incidental contact with any impacted soil and/or groundwater by site employees or visitors is prevented. Any repair work in the street adjacent to and downgradient of the Site would be conducted at a shallower depth than any documented impacted soil or groundwater. Soil gas samples collected on and downgradient of the site indicate no exceedances of applicable conservative screening levels (ESLs, CHHSLs).

## **Media-Specific Criteria**

### **1. Groundwater:**

The contaminant plume at the Site is less than 200 feet, is stable or decreasing in areal extent, contains no measurable or removable free product, is over 1,000 feet from water supply wells, and the nearest surface water body is Sausal Creek, approximately 800 feet (upgradient).

### **2. Petroleum Vapor Intrusion to Indoor Air:**

Soil gas samples collected in the vicinity of downgradient residences were below screening levels for all compounds.

### **3. Direct Contact and Outdoor Air Exposure.**

The area of the Site and the surrounding area is paved, preventing direct contact with impacted soil and groundwater. Levels of benzene detected in soil samples are well below those listed in Table 1 of the Low Threat Closure Policy. Utility workers will not encounter impacted soil which is at greater depth than underground utilities.