

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
05-15-06

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

May 12, 2006

Mr. Parwez Faizi
Lucasey Manufacturing
2744 East 11th Street
Oakland, CA 94601

Subject: SLIC Case RO0002902, Lucasey Manufacturing, 2744 East 11th Street, Oakland, CA 94601 – Work Plan Review

Dear Mr. Faizi:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above-referenced site, including the document entitled, "Soil and Groundwater Investigation Workplan," dated April 25, 2006. The Work Plan proposes advancing soil borings to collect soil and groundwater samples and using a mobile laboratory to delineate the extent of contamination. The proposed scope of work is generally acceptable provided that the technical comments below are addressed and incorporated during the field investigation.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to jerry.wickham@accgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- 1. Base Maps and Plume Extent.** The locations of site features and previous soil borings shown on the Proposed Soil Boring Locations map (Figure 6) differ from the locations of features and previous soil borings shown on Figure 4. Please verify that the locations of site features and previous soil borings on the base map used for Figure 6 are accurate. Please make any necessary revisions prior to conducting the field investigation. If any significant revisions the Proposed Soil Boring Locations map (Figure 6) are necessary, please submit the revised map of boring locations to ACEH for review prior to conducting the field investigation.
- 2. Plume Extent on Figure 6 and Soil Boring Locations.** The "Estimated Extent of Hydrocarbon Plume," which is shown on Figure 6 as a hachured area, significantly underestimates the size of the dissolved phase hydrocarbon plume. The hachured area is approximately the size of the area of probable free product. Several of the proposed borings, particularly those south of the hachured area are north of existing borings where groundwater contamination has already been detected at significant concentrations. Therefore, collecting grab groundwater samples at these proposed locations is not likely to achieve the stated objective of delineating the horizontal extent of the plume. However, these proposed borings are expected to be useful in delineating the extent of free product

and highly elevated concentrations of residual product in soil within the interior portion of the plume. In order to provide delineation of the dissolved phase plume, we have requested additional soil boring locations, which are shown on the attached figure entitled, "Revised Soil Boring Locations." ACEH has no objection to advancing stepout borings based on observed conditions and analytical results from a mobile laboratory. Please advance the additional requested borings shown on the attached figure and present the results in the Soil and Groundwater Investigation Report requested below.

3. **Soil Samples.** We concur with the collection of continuous soil samples for logging purposes in each boring. At a minimum, we request that one soil sample collected from a depth of 5 feet bgs, one soil sample collected from the capillary fringe, and one soil sample collected at the first lithologic change below first-encountered groundwater be submitted for laboratory analyses from each boring. If contamination is observed, soil samples are to be submitted for laboratory analyses for all depth intervals where the staining, odor, or elevated PID readings are observed. If staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number of soil samples from this interval should be submitted for laboratory analyses to characterize the fuel hydrocarbon concentrations within this interval. Please present the results in the Soil and Groundwater Investigation Report requested below.
4. **Depth of Soil Borings and Vertical Extent of Contamination.** We concur with the proposal to extend the soil borings deeper than 24 feet bgs if contamination extends below this depth as indicated by analytical results. We also request that the borings be extended below 24 feet bgs if field screening indicates that soil contamination extends more than 24 feet bgs. Regardless of whether contamination is observed in the soils at the bottom of the borings, we request that three soil borings (marked on the attached figure entitled, "Revised Soil Boring Locations") be extended to a depth of 36 feet bgs. Grab groundwater samples are to be collected from the first-encountered groundwater in each of the borings and from all permeable water-bearing zones observed below first-encountered groundwater. A minimum of one grab groundwater sample is to be collected below first-encountered groundwater in each of the borings extended to 36 feet bgs.
5. **Electrical Conductivity Logging.** Conductivity logging is proposed at "select borings." However, the number and locations of borings at which conductivity logging will be conducted is not specified. At a minimum, we request that conductivity logging be conducted along two transects as shown on the attached figure entitled, "Revised Soil Boring Locations," in order to construct hydrogeologic cross sections for the site. Please present the results of the conductivity logging in the Soil and Groundwater Investigation Report requested below.
6. **Laboratory Analyses.** We concur with the proposed laboratory analyses for total petroleum hydrocarbons as gasoline, diesel, and motor oil but request that benzene, toluene, ethylbenzene, xylenes, MTBE, ethylene dibromide, and 1,2-dichloroethane are also included as laboratory analytes.
7. **Geotracker EDF Submittals.** Pursuant to CCR Sections 2729 and 2729.1, beginning July 1, 2005 for SLIC cases, 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 website via the internet. Additionally, all

permanent monitoring points utilized to collect 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 accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports (LUFT or SLIC) is required in Geotracker (in PDF format). Please upload all SLIC analytical data collected after July 1, 2005 to the SWRCB's Geotracker database website in accordance with the above-cited regulation.

TECHNICAL REPORT REQUEST

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

- **September 29, 2006 – Soil and Groundwater Investigation Report**

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

Effective **January 31, 2006**, 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).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at jerry.wickham@acgov.org.

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.

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
Hazardous Materials Specialist

Mr. Parwez Faizi
May 12, 2006
Page 5

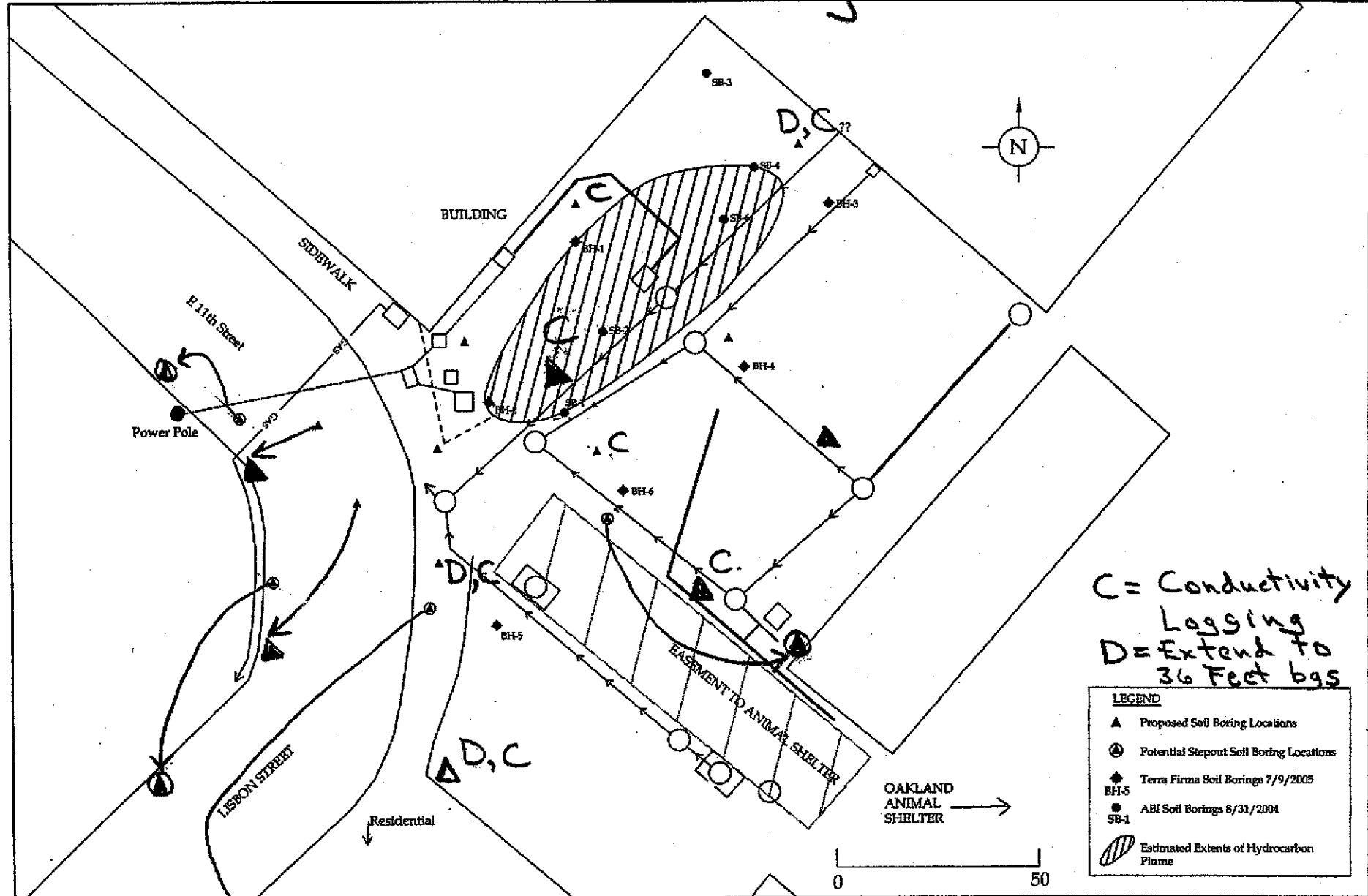
Attachment: Revised Soil Boring Locations Figure

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Matthew Ryder-Smith, Clearwater Group, 229 Tewksbury Avenue, Point Richmond, CA
94801

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Revised Soil Boring Locations



C = Conductivity Logging
 D = Extend to 36 Feet bgs

LEGEND	
▲	Proposed Soil Boring Locations
⊙	Potential Stepout Soil Boring Locations
◆	Terra Firma Soil Borings 7/9/2005
BH-5	ABE Soil Borings 8/31/2004
■	SB-1
▨	Estimated Extents of Hydrocarbon Plume

PROPOSED SOIL BORING LOCATIONS Lucasey Manufacturing 2744 East 11th Street Oakland, California	CLEARWATER GROUP		
	Project No. FB022E	Figure Date 04/06	Figure 6

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
02-24-06

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

February 23, 2006

Mr. Peter Faizi
Lucasey Manufacturing
2744 East 11th Street
Oakland, CA 94601

Subject: SLIC Case RO0002902, Lucasey Manufacturing, 2744 East 11th Street, Oakland, CA 94601

Dear Mr. Faizi:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above-referenced site, including the reports entitled, "Phase I Environmental Site Assessment," dated August 24, 2004, and "Phase II Subsurface Investigation Report," dated September 14, 2004. Both reports were prepared on your behalf by AEI Consultants, Inc. Please see technical comment 1 below regarding some miscellaneous sampling data that is also included in the case files.

Elevated concentrations of petroleum hydrocarbons have been detected in soil and groundwater in the area of a former oil storage house and underground storage tanks (USTs). Based on the highly elevated concentrations detected in groundwater samples, separate phase hydrocarbons (SPH) are likely to exist on top of the water table. The extent of soil and groundwater contamination has not been defined. Further investigation and cleanup of this site will be required in order to proceed toward case closure.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

- 1. Miscellaneous Sampling Data.** The case file includes a chain of custody form completed by Terra Firma Consulting LLC, laboratory analytical reports from McCampbell Analytical, Inc., and a one page "Site Plan," for soil and groundwater samples collected on July 9, 2005. No other supporting information such as documentation of the field activity, description of sampling protocol, soil boring logs, or survey data is included for these soil and groundwater samples collected on July 9, 2005. The limited information currently available in the files for these soil and groundwater samples is insufficient for these data to be evaluated. Please submit any reports or supporting information for these samples and laboratory analyses with the Work Plan requested below.
- 2. Site History and Sources of Contamination.** Elevated concentrations of petroleum hydrocarbons have been detected in soil and groundwater samples collected in the area of a former oil storage house and USTs. Since no documentation is available to confirm that

the USTs were removed, further investigation is required to confirm that the USTs were removed. In addition, further investigation is necessary to evaluate whether other sources of contamination may exist at the site. Please present plans to investigate the source(s) of soil and groundwater contamination at the site in the Work Plan requested below.

3. **Defining the Horizontal and Vertical Extent of Contamination.** The horizontal and vertical extent of soil and groundwater contamination has not been defined for the site. Please present plans in the Work Plan requested below to conduct a soil and groundwater investigation to define the horizontal and vertical extent of soil and groundwater contamination.
4. **Detailed 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 ½ mile 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 collected as part of your survey are required. Please present your results in the Work Plan requested below.
5. **Utility Survey.** An evaluation of the potential for utility lines and trenches (including sewers, storm drains, pipelines, and trench backfill) to act as preferential pathways for contaminant migration is required. Please present a map in the Work Plan requested below showing the locations of utility lines and trenches within and near the site.
6. **Sensitive Receptors.** Please identify any sensitive receptors such as schools, day care centers, or medical care facilities within 200 feet of the site. Please include this information in the Work Plan requested below.
7. **Corrective Action Plan.** The purpose of the CAP is to use the information obtained during site investigation activities to propose cost-effective final cleanup objectives for the entire contaminant plume and remedial alternatives for soil and groundwater that will adequately protect human health and the environment, eliminate nuisance conditions, and protect water resources. A CAP for the cleanup of contamination in soil and groundwater will be required upon completion of the Soil and Groundwater Investigation in accordance with the schedule specified below. The CAP shall address at least two technically and economically feasible methods to meet the cleanup objectives for each contaminant established in the CAP. The CAP must propose verification monitoring to confirm completion of corrective actions and evaluate CAP implementation effectiveness.
8. **Geotracker EDF Submittals.** Pursuant to CCR Sections 2729 and 2729.1, beginning July 1, 2005 for SLIC cases, 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 website via the internet. Additionally, all permanent monitoring points utilized to collect 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 accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports (LUFT or SLIC) is required in

Geotracker (in PDF format). Please upload all SLIC analytical data collected after July 1, 2005 to the SWRCB's Geotracker database website in accordance with the above-cited regulation.

TECHNICAL REPORT REQUEST

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

- **April 24, 2006 – Work Plan**
- **120 days after ACEH Approval of Work Plan – Soil and Groundwater Investigation Report**
- **60 days after ACEH Comments on Soil and Groundwater Investigation Report – Corrective Action 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

Effective **January 31, 2006**, 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).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at jerry.wickham@acgov.org.

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.

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
Hazardous Materials Specialist

Mr. Peter Faizi
February 23, 2006
Page 5

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Matthew Ryder-Smith, Clearwater Group, 229 Tewksbury Avenue, Point Richmond, CA
94801

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



325
02-23-06

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

February 22, 2006

Mr. Parwez Faizi
Lucasey Manufacturing
2744 East 11th Street
Oakland, CA 94601

Subject: SLIC Case RO0002902, Lucasey Manufacturing, 2744 East 11th Street, Oakland, CA 94601

Dear Mr. Faizi:

In order for ACEH to review reports for your site, we would require an oversight account for the above-referenced site. To set up your account, please send a check in the amount of \$6,000.00 payable to Alameda County Environmental Health. Please send your check to the attention of our Finance Department.

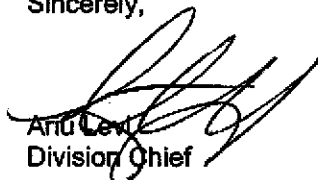
This initial deposit may or may not be sufficient to provide all necessary regulatory oversight. ACEH will deduct actual costs incurred based upon the hourly rate specified below. If these funds are insufficient, additional deposit will be requested. Otherwise, any unused monies will be refunded to you 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#0315763 on your check.

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

Sincerely,



Aru Lew
Division Chief

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