



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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January 6, 2010

Mr. Chris Lucasey  
Lucasey Manufacturing Corporation  
P.O. Box 14023  
Oakland, CA 94614-2023

Subject: SLIC Case RO0002902 and Geotracker Global ID T0600133151, Lucasey Manufacturing, 2744 East 11<sup>th</sup> Street, Oakland, CA 94601 – Conditional Work Plan Approval

Dear Mr. Lucasey:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above-referenced site, including the recently submitted document entitled, "*Site Investigation Work Plan*," dated November 20, 2009 (Work Plan). The Work Plan, which was prepared by Environmental Resources Management, proposes a scope of work that includes soil borings, well installation, and soil vapor sampling.

The proposed scope of work in the "*Site Investigation Work Plan*," dated November 20, 2009, is conditionally approved and may be implemented provided that the technical comments below are addressed and incorporated during the proposed field investigation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed.

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

#### **TECHNICAL COMMENTS**

- 1. Water Supply Wells.** No further information regarding water supply wells at the site is requested at this time.
- 2. Free Product Monitoring Wells.** The Work Plan proposes the installation of five monitoring wells for monitoring of free product. As described in the Work Plan, well construction details will be based upon the encountered soil types. The proposed locations and guidelines for well installation are generally acceptable. Product monitoring and recharge methods are proposed on a weekly basis for the first four weeks following development and then monthly for two additional months. We request that the proposed three month product recharge monitoring schedule be extended in order to consider potential seasonal effects on product movement. Therefore, we request that one additional free product monitoring event be conducted during the dry season approximately three months following the proposed three month product recharge testing and monitoring. The results of the well installation and initial three month product recharge monitoring are to be presented in the Site Investigation Report requested below. The results of the extended dry season product recharge monitoring are to be presented in the letter report requested below.

3. **Free Product Recovery.** The Work Plan indicates that a free product recovery program will be proposed if product continues to recharge the wells. We wish to clarify that consideration of free product recovery methods should not be limited to the use of monitoring or recovery wells. Additional or supplemental technologies for free product recovery are likely to be more feasible and efficient than passive recovery from a well.
4. **Proposed Soil Boring.** One soil boring is proposed northwest of previous soil boring SB-24 to delineate the extent of free product. The proposed boring location northwest of SB-24 is acceptable. However, we request that one additional soil boring be advanced to the southwest along Lisbon Street. A suggested location is provided on Attachment A; Sampling Locations. In each soil boring, we request that soil samples be collected for laboratory analysis from any zones where visible staining, odor, or elevated PID readings are observed. If no visible staining, odor, or elevated PID readings are observed in the borings, soil samples are to be collected at depths of 5, 10, 15, and 20 feet bgs. If no free product is encountered in the borings, we request that a groundwater sample be collected for laboratory analysis. The soil and groundwater samples are to be analyzed for total petroleum hydrocarbons (TPH) as gasoline, TPH as diesel, and TPH as motor oil using EPA Method 8015M and BTEX using EPA Method 8260B. Please present the results in the Site Investigation Report requested below.
5. **Soil Vapor Analyses.** The Work Plan proposes analysis of the soil vapor samples for BTEX and naphthalene using Modified EPA Method TO-15. We request that the soil vapor samples be analyzed for the full scan of VOCs including chlorinated solvents and not limited to reporting of BTEX and naphthalene. We also request that the soil vapor samples be analyzed for TPH as gasoline using Modified EPA Method TO-15 or 8260B, and TPH as diesel using EPA Method 8015M or Method TO-17. Please present the results in the Site Investigation Report requested below.
6. **Geotracker EDF Submittals.** Review of the State Water Resources Control Board (SWRCB) Geotracker website indicates that recent reports and work plans have not been uploaded to Geotracker as required 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 website via the internet. Additionally, beginning January 1, 2002, 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). In order to remain in regulatory compliance, please upload all SLIC analytical data and copies of reports post 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:

- **June 16 , 2010** – Site Investigation Report
- **September 16, 2010** – Extended Product Recharge Monitoring Letter 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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to 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 Instructions." 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. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all 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 monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is 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](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

### 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

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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.

### **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 or send me an electronic mail message at [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org).

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297  
Senior Hazardous Materials Specialist

Attachment A: Sampling Locations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

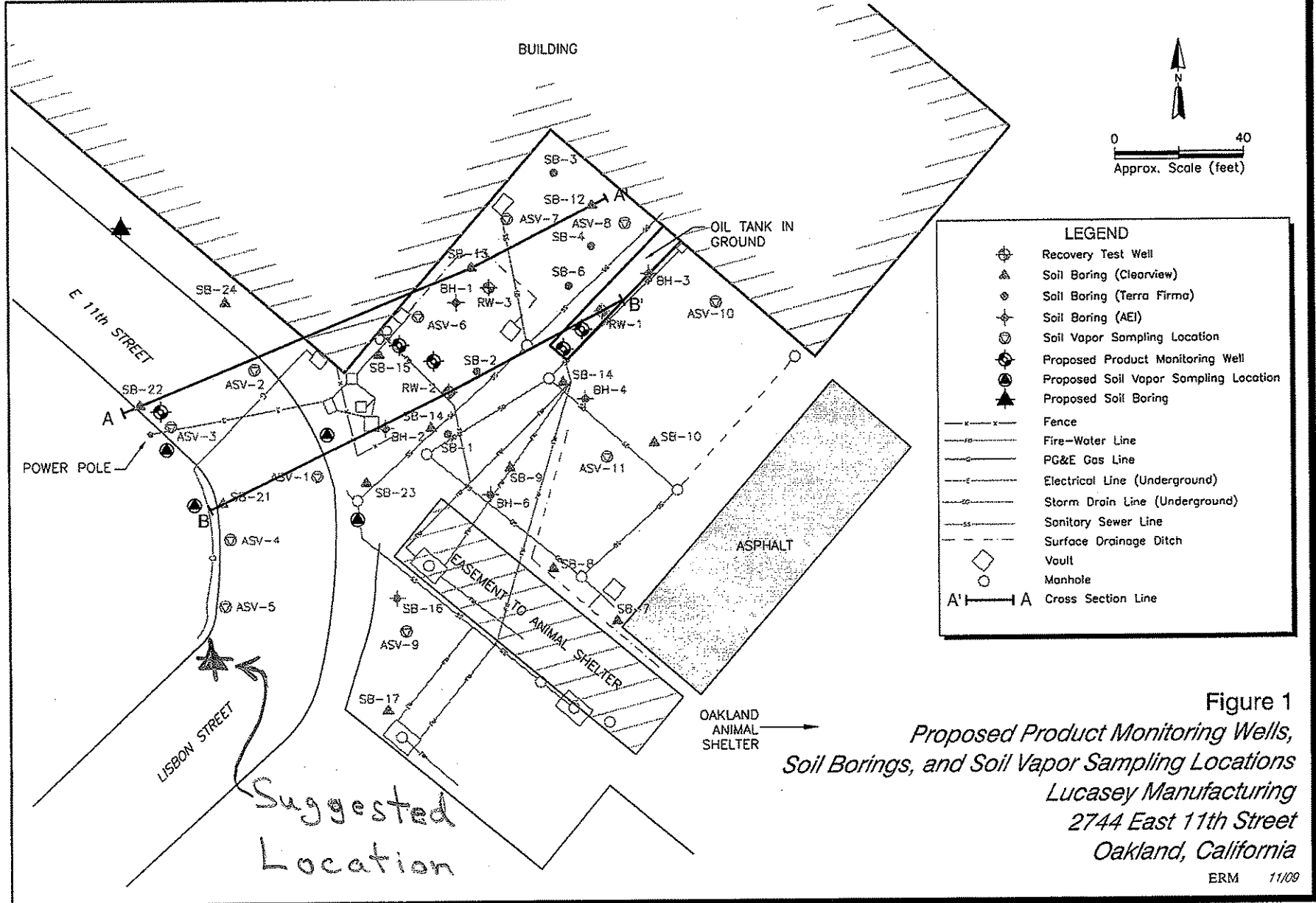
Cc: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 2032 (*Sent via E-mail to: [lgriffin@oaklandnet.com](mailto:lgriffin@oaklandnet.com)*)

John Moe, ERM, 1777 Botelho Drive, Suite 260, Walnut Creek, CA 94596 (*Sent via E-mail to: [John.Moe@erm.com](mailto:John.Moe@erm.com)*)

Paul Strange, The Strange Law Firm, 3100 Oak Road, Suite 390, Walnut Creek, CA 94597

Donna Drogos, ACEH (*Sent via E-mail to: [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org)*)  
Jerry Wickham, ACEH

Geotracker, File



# Attachment A: Sampling Locations

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>ISSUE DATE:</b> July 5, 2005
	<b>REVISION DATE:</b> March 27, 2009
	<b>PREVIOUS REVISIONS:</b> December 16, 2005, October 31, 2005
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

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.

#### REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- 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 **must** be included and have either original or electronic signature.
- **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.**
- 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:
  - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
    - i) Send an e-mail to [dehloptoxic@acgov.org](mailto:dehloptoxic@acgov.org)
    - Or
    - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of My Le Huynh.
  - b) 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**.
  
- 2) Upload Files to the ftp Site
  - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
    - (i) Note: Netscape and Firefox browsers will not open the FTP site.
  - 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](mailto: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 @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) If site is a new case without an RO# use the street address instead.
  - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.