

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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FAX (510) 337-9335

April 6, 2007

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 11th Street, Oakland, CA 94601

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, "Soil and Groundwater Investigation Report," dated March 7, 2007. The report presents the results of soil and groundwater sampling from 13 direct push borings and electrical conductivity at 7 borings. Free product was observed in several borings both on-site and off-site. The extent of contamination has not been determined to the west, south, and north from the apparent source area. Three proposed borings (SB-18 through SB-20) along Lisbon Street were not completed and two proposed borings were not sampled (SB-16 and SB-17). The field investigation was apparently stopped due to budgetary constraints.

Further investigation is required to define the on-site and off-site extent of contamination. We request that you prepare a Work Plan that includes two phases of investigation. The first phase of investigation is to define the extent of free phase product and the dissolved phase plume to the west, south, and north of the existing borings using soil sampling and grab groundwater sampling. The second phase of investigation is to include installation of monitoring and free product recovery wells.

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

TECHNICAL COMMENTS

1. **Extent of Free Product.** Free phase product likely extends beneath the on-site building and may extend beneath off-site residences. We request that you prepare a Work Plan that includes as an initial phase, soil borings to define the extent of free product and the dissolved phase plume to the west, south, and north of the existing borings. As noted in the Soil and Groundwater Investigation Report, the additional subsurface investigation will require access agreements with adjacent landowners and encroachment permits from the City of Oakland. Soil and groundwater sampling from direct push soil borings beyond the area of the existing borings is acceptable. Please present plans for the soil borings in the Work Plan requested below.

2. **Groundwater Monitoring and Recovery Wells.** Following the initial phase of soil borings to define the extent of free product and the dissolved phase plume, we request that you install groundwater monitoring and recovery wells. Free product recovery will be required at this site. Therefore, groundwater monitoring/recovery wells are to be installed within the area of free product to initially measure the thickness of free product present in the formation and then to recover free product. Groundwater monitoring wells will also be required outside the area of free product to evaluate the hydraulic gradient and monitor water quality over time. Please present plans for the monitoring and recovery wells in the Work Plan requested below.
3. **Soil Vapor Sampling.** The Soil and Groundwater Investigation Report recommends a soil vapor survey to help define the lateral extent of contamination. Site conditions are described as predominantly fine-grained soils with groundwater under semi-confined to confined conditions. Benzene, toluene, ethylbenzene, and xylenes were not detected in any soil samples and were not detected in groundwater samples at concentrations greater than 1.7 micrograms per liter. Given these conditions, we do not concur that soil vapor sampling would be useful to define the extent of contamination.
4. **Request for Identification of Adjacent Property Owners.** Public participation is a requirement for the Corrective Action Plan process. In order to provide notification to potentially affected members of the public, please provide a list of all properties, which are currently or may in the future be directly or indirectly affected by the petroleum release from your site or the proposed corrective action. The list is to identify the properties by street address, parcel number, and property owner name. Please also provide a map showing the street address for each of the listed properties. A current mailing address is to be included for each property owner. ACEH will notify each of the property owners on the list of the proposed investigation.

TECHNICAL REPORT REQUEST

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

- June 7, 2007 – Work 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

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).

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.

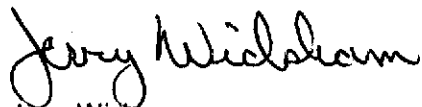
AGENCY OVERSIGHT

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.

Mr. Parwez Faizi
April 6, 2007
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If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Parwez Faizi, Lucasey Manufacturing, 2744 East 11th Street, Oakland, CA 94601

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

Robert Nelson, Clearwater Group, 229 Tewksbury Avenue, Point Richmond, CA 94801

Donna Drogos, ACEH
Jerry Wickham, ACEH
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