

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R02927

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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February 22, 2006

Mr. Jerry Wallace
AquaChlor
By Swim Chem
P.O.Box 417638
Sacramento, CA 95841

RE: Aqua Chlor - 15885 Altamont Pass Road, Tracy, CA
Work Plan for Soil Profiling and Requirement For Groundwater Sample

Dear Mr. Wallace:

The Alameda County Department of Environmental Health (ACDEH) has reviewed the letter dated December 26, 2005, submitted by Compliance & Closure, Inc. (CCI) in response to our request of ground water sampling.

AquaChlor closed their chlorine transfer operation in 2005. As part of the closure procedure, samples were collected in the former process areas to confirm the presence of any contamination associated with the former process at the site. Based on past history of chemical handling and spill reports, the location of the chlorine transfer station, sodium hydroxide tank and ethylene glycol freezer are the areas of concern. Ethylene glycol (1700 mg/kg) has been found in one of the soil samples collected at the site. CCI proposed to drill a single boring at that sample location to a depth of 25 feet to investigate possible migration of the contaminant and impact to ground water beneath the site.

In the response letter, CCI established that there had not been any lateral migration of the ethylene glycol based on two other samples collected in the top 15 inches of the soil. ACEHD is concern of the vertical migration and therefore requested a water sample. The Alameda County Local Oversight Program (LOP), the group in charge of contaminated site clean up here in our office recommended that groundwater be collected at the site. Based on the fact that ethylene glycol has very little affinity for soil and therefore will not stay bound to the top layer as suggested and without the knowledge of the hydrogeology of the area, a grab water sample is being required.

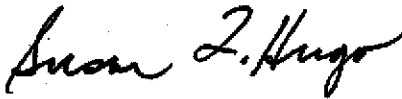
The ACDEH required soil sampling in the freezer area based on past history of ongoing spill & releases at the time of use. According to our record, the use of ethylene glycol continued until 2003. The release happened during the dragging of the smaller cylinders from the freezer to the chlorine transfer station. In addition, there was a reported illegal weekly disposal of antifreeze in the ground. Based on these ongoing releases at the time of use, collection of groundwater sample beneath the site is necessary.

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A drilling permit is required for any soil boring from the local jurisdiction. Information as to the depth of water table in the area and local hydrogeology can also be obtained from this permitting agency.

If you have any questions, please contact me at (510) 567-6780 or Sukla De at (510) 304-5446. You can also e-mail me at susan.hugo@acgov.org.

Sincerely,



Susan Hugo
Supervising Hazardous Materials Specialist

cc: Ariu Levi – Chief, Environmental Health
Chris Gray – BOS District 1
Sukla De – Environmental Health
Gary Mulkey – Compliance & Closure