ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
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August 31, 2012

Mr. Walter Pierce
Western Forge & Flange Co.
687 Country Rd 2201
Cleveland, TX 77327
(sent via electronic mail to wpierce@western-forge.com)

Subject: Request for an SCM and a Data Gap Work Plan; Spills, Leaks, Investigations and Cleanup (SLIC) Case No. RO0003009 and Geotracker, Global ID # T10000001598; Western Forge & Flange, 540 Cleveland Ave. Albany, CA 94706

Dear Mr. Pierce:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the *Remedial Investigation Report,* dated June 27, 2012. The document was submitted on your behalf by Ninyo & Moore, Inc. Thank you for submitting the report.

The report documented the installation of 28 shallow soil bores to investigate multiple source areas at the site (a minimum of eight to nine are documented). Concentrations up to 6,500 mg/kg TPHho, 4.1 mg/kg arsenic, and 38 mg/kg vanadium were detected in soil; all other metals analytes, and PCBs, were non-detectable at standard reporting limits. Concentrations up to 7,300 µg/l TPHho, 1.7 µg/l benzene, 74 µg/l naphthalene, and 13.0 tert-butanol (TBA) were detected in groundwater. A series of metals were also detected in groundwater over ESLs after field filtering and include arsenic, barium, cobalt, hexavalent chromium (the later potentially partially due to matrix interference), lead, molybdenum, nickel, vanadium, and zinc. Groundwater was generally established to be non-potable with conductivity generally over California recommended conductivity goals; however, was below Basin Plan standards for saltwater (10,000 mg/l or 10 part per thousand, 95% of the time).

Based on the review of the case file ACEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

1. **Electronic Report and Data Upload Compliance –** A review of the case file and the State's Geotracker database indicates that the site is not in compliance with previous directive letters. **Compliance is a State requirement**. While a recent telephone conversation with Ninyo and Moore requested uploads and these are reported to have recently been initiated, these are not yet available for review. To preclude future miscommunications ACEH includes this Technical Comment in this letter. Please be aware that California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, require that beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs, including SLIC programs. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites was required in GeoTracker. At present missing data and documents include, but may not be limited to, older reports, older EDF submittals, GEO_MAPS, GEO_WELL data, and all bore logs. **Compliance is required by the State**. Please see Attachment 1 for limited additional details, and the state GeoTracker website for full details.

ACEH requests notification of, and a list of, the documents uploaded to Geotracker. Please upload all submittals to GeoTracker as well as to ACEH's ftp website by the date specified below.

2. **Request for an SCM and Data Gap Work Plan -** In order to define the extent of soil and groundwater contamination (upgradient, lateral, and downgradient in soil and groundwater) at the site ACEH requests the submittal of a Site Conceptual Model (SCM) and a data gap work plan by the date identified below. The SCM is expected to serve to identify data gaps at the site for the associated requested work plan.

   A site conceptual model (SCM) is intended to synthesize all analytical data and evaluates all potential exposure pathways and potential receptors that may exist at the site and vicinity, including identifying or developing site cleanup objectives and goals. At a minimum, the SCM should include:

   (1) Local and regional plan view maps that illustrate the location of sources (former facilities, piping, tanks, etc.) extent of contamination, direction and rate of groundwater flow, potential preferential pathways, and locations of receptors;

   (2) Geologic cross section maps that illustrate subsurface features, man-made conduits, and lateral and vertical extent of contamination;

   (3) Summary tables of chemical concentrations in different media (i.e. soil, groundwater, and soil vapor);

   (4) Well logs, boring logs, and well survey maps; and

   (5) Discussion of likely contaminant fate and transport.

   If data gaps (i.e. potential upgradient sources, potential contaminant volatilization to indoor air. or contaminant migration along preferential pathways, etc.) are identified in the SCM, please include a proposed scope of work to address those data gaps in the work plan due by the date specified below.

   Data gaps noted by ACEH include the following; however, are NOT limited to the following observations:

   a. **Resolution of Remedial Goals –** The site is located in a heavy industrial / commercial area between two Interstate Freeways (580 and 80); however, analytical tables provide comparisons to residential soil and groundwater cleanup values. This produces conflicting work scoping issues and goals for the site and requires clarification prior to proceeding with a data gap investigation, and is best done within an SCM and a data gap work plan.

   b. **Delineation of Vertical and Lateral Extent of Soil and Groundwater Contamination –** Analytical data from several soil bores do not define the vertical extent of soil contamination at the site (depending on the remedial goals selected for the site B-8A, B-10, B-12, and B-14). Analytical data from several bores are not laterally constrained by lower analytical data and thus do not define the lateral extent of soil and groundwater contamination at the site (B-8A, B-10, B-23, and B-24). A source for soil contamination in B-7 is unresolved, but may be associated with Pit 2; however, the lack of soil analytical at the groundwater interface in B-20 and B-21 or soil in association with the groundwater interface or groundwater data in B3 renders this Area of Concern undefined. The lack of soil analytical at the groundwater interface in soil bores B-22 and B-23 indicates the delineation of Pit 1 is not complete due to the presence of 320 µg/l TPHho in groundwater collected from bore B-23 (presuming Pit 1 is the source of this hydraulic oil). The Ring Roller Pit also has multiple issues that require resolution.

   c. **Sidewall Confirmation Sampling –** The southeast side wall of Area of Concern 6B was sampled by the previous consultant and yielded 120 mg/kg TPHho. Presuming there was sufficient reason to investigate this area, at present there is no data for the other three sides and the bottom, while soil bore B-15 only has (very low) analytical data collected within the upper 1.0 feet of the surface; however, 520 µg/l TPHho were documented in bore B-15. Area of Concern 107 similarly lacks certain details (eastern sidewall and pit bottom

confirmation samples), and depending on remedial goals may not be defined to the south and is not defined laterally to the southwest, west, north and east.

d. **Hexavalent Chromium –** Although unidentified as such, the source for the hexavalent chromium may potentially be the Ring Roller Pit; however, matrix interference may account for some of the reported concentrations that contribute to this identification. It would appear appropriate to further investigate this contaminant and potential sources at the site. In general this contaminant appears to be predominantly found in the western portion of the site.

e. **Metals Contamination –** A series of metals were detected in groundwater over ESLs after field filtering and include arsenic, barium, cobalt, hexavalent chromium, lead, molybdenum, nickel, vanadium, and zinc. With the exception of arsenic and vanadium, concentrations in soil were not above ESLs, and it was surmised that metal concentrations were likely to be related not to soil contaminants but to pre-1985 discharges of metals impacted process cooling water and storm water to the site storm drain located at the western end of the site (not located). While these contaminants may (or may not) be from former discharges, one or more of the metals contaminants were present in groundwater collected from all soil bores across the western investigated portion of the site. ACEH notes that the sample with the highest percentage of detections exceeding ESLs (B-18) was in the southern-most portion of the site and presumes this location is away from the unlocated storm drain discharge location. Site specific background metals contamination in soil or in groundwater has also not been established or investigated. As a consequence additional investigative effort appears appropriate to establish appropriate remedial goals prior to identification of a remediation technology.

3. **Appropriate Analytical Suite –** The nearly complete lack of detection of volatile organic compounds in groundwater appears to indicate that these analytes can be eliminated from future analytical testing. Conversely because of the use of the hydraulic oil as quenching oil, inclusion of semi-volatile compounds in the analytical suite appears appropriate (by EPA 8270). Naphthalene, detected in one bore location over ESLs, would be included in this analytical suite.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **September 28, 2012 –** Geotracker Submittal Notification
  File to be named: RO3009_CORRES_L_yyyy-mm-dd
- **October 26, 2012 –** SCM and Data Gap Work Plan
  File to be named: RO3009_SCM_WP_R_yyyy-mm-dd
- **Sixty Days After SCM and Data Gap Work Plan Approval –** Site Investigation Report
  File to be named: RO3009_SWI_R_yyyy-mm-dd

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.

Online case files are available for review at the following website: http://www.acgov.org/aceh/index.htm.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Digitally signed by Mark E. Detterman
DN: cn=Mark E. Detterman, o, ou, email, c=US
Date: 2012.08.31 10:44:41 -07'00'

Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations
Electronic Report Upload (ftp) Instructions

cc: Kris Larson, Ninyo & Moore, 1956 Webster Street, Suite 400, Oakland, CA 94612; (sent via electronic mail to klarson@ninyoandmoore.com)

Donna Drogos, (sent via electronic mail to donna.drogos@acgov.org)
Mark Detterman (sent via electronic mail to mark.detterman@acgov.org)
Electronic File, GeoTracker

Attachment 1

Responsible Party(ies) Legal Requirements/Obligations

REPORT/DATA REQUESTS

These reports/data are being requested pursuant to Division 7 of the California Water Code (Water Quality), Chapter 6.7 of Division 20 of the California Health and Safety Code (Underground Storage of Hazardous Substances), and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations (Underground Storage Tank Regulations).

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (Local Oversight Program [LOP] for unauthorized releases from petroleum Underground Storage Tanks [USTs], and Site Cleanup Program [SCP] for unauthorized releases of non-petroleum hazardous substances) require submission of reports in electronic format pursuant to Chapter 3 of Division 7, Sections 13195 and 13197.5 of the California Water Code, and Chapter 30, Articles 1 and 2, Sections 3890 to 3895 of Division 3 of Title 23 of the California Code of Regulations (23 CCR). Instructions for submission of electronic documents to the ACEH FTP site are provided on the attached "Electronic Report Upload Instructions."

Submission of reports to the ACEH FTP site is in addition to requirements for electronic submittal of information (ESI) to the State Water Resources Control Board's (SWRCB) Geotracker website. In April 2001, the SWRCB adopted 23 CCR, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1 (Electronic Submission of Laboratory Data for UST Reports). Article 12 required electronic submittal of analytical laboratory data submitted in a report to a regulatory agency (effective September 1, 2001), and surveyed locations (latitude, longitude and elevation) of groundwater monitoring wells (effective January 1, 2002) in Electronic Deliverable Format (EDF) to Geotracker. Article 12 was subsequently repealed in 2004 and replaced with Article 30 (Electronic Submittal of Information) which expanded the ESI requirements to include electronic submittal of any report or data required by a regulatory agency from a cleanup site. The expanded ESI submittal requirements for petroleum UST sites subject to the requirements of 23 CCR, Division, 3, Chapter 16, Article 11, became effective December 16, 2004. All other electronic submittals required pursuant to Chapter 30 became effective January 1, 2005. Please visit the SWRCB website for more information on these requirements. (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

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, 7835, 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, late 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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	**REVISION DATE:** July 25, 2012
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	**SUBJECT:** Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (petroleum UST and SCP) 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

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single Portable Document Format (PDF) with no password protection**.
- 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)

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 deh.loptoxic@acgov.org
   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, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
   b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
   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 deh.loptoxic@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.