



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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April 23, 2014

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

Subject: Approval of Soil Corrective Actions; Site Cleanup Program (SCP) 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 including the *Response to Technical Comments*, dated April 21, 2014. The response letter was prepared on your behalf by Ninyo & Moore. Thank you for submitting the response.

ACEH is in general agreement with comments contained in the response letter, and based on the analytical data it appears that corrective actions at the site have successfully mitigated known soil contamination sources at the site and achieved cleanup goals. Additionally, groundwater analytical data also indicates that except for low concentrations of two dissolved metals (molybdenum and nickel), groundwater appears to largely be below the selected Environmental Screening Level (ESL) goals selected for the site. Based on these data it appears that the *Soil Management Plan* previously submitted for the site is sufficient to manage the proposed redevelopment, and that a *Site Management Plan* (for soil and groundwater) will not be required to manage future subsurface incursions.

Therefore the proposed site redevelopment may proceed provided you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

- 1. Soil Management Plan Implementation Report** – In order to document the implementation of the Soil Management Plan, and any actions taken to manage potentially contaminated soil that may be encountered during redevelopment, a Soil Management Plan Implementation Report is requested to be submitted by the date identified below. This should include disposal documentation of any contaminated soil or groundwater if required. Should additional time be required for the submittal of the report, please notify ACEH with an extension basis, and request an appropriate extension.
- 2. As-Built Plan of Site Redevelopment** – To document any changes to the development plan, ACEH additionally requests the submittal of an as-built site plan, including any subgrade structures, such as utilities, elevator pits, or other infrastructure that extends into the subsurface. Please submit the plan by the date identified below.
- 3. Groundwater Monitoring** – Except for naphthalene, ACEH is in general agreement with the recommendation to eliminate poly-aromatic hydrocarbons (PAHs) from the groundwater analytical suite. While still slightly below site ESL goal of 6.1 micrograms per liter ($\mu\text{g/l}$), naphthalene concentrations in well MW-1 are on a sharply increasing trend (rising from 0.99 $\mu\text{g/l}$ to 5.2 $\mu\text{g/l}$). Please submit a groundwater monitoring report by the date identified in the April 14, 2014 directive

letter and incorporated below. Please submit groundwater samples for TPH as hydraulic oil, metals, and naphthalene by standard analytical protocols.

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 specified file naming convention below, according to the following schedule:

- **August 8, 2014** – Groundwater Monitoring Report
File to be named RO3009_GWM_R_YYYY-MM-DD
- **October 10, 2014** – Soil Management Plan Implementation and Site As-Built Plan
File to be named: RO3009_MISC_R_YYYY-MM-DD

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,

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)

Cem Atabek, Ninyo & Moore, 1956 Webster Street, Suite 400, Oakland, CA 94612; (sent via electronic mail to catabek@ninyoandmoore.com)

Dilan Roe (sent via electronic mail to dilan.roe@acgov.org)

Mark Detterman (sent via electronic mail to mark.detterman@acgov.org)

Electronic File, GeoTracker