

From: [Detterman, Karel, Env. Health](#)
To: "efco"
Cc: dave@eras.biz; kasey@eras.biz
Subject: RE: Fuel Leak Case No. Fuel Leak Case RO0003133 and GeoTrackerGlobal ID T10000005808, Equipment Fabricating, 729 45th Avenue, Oakland CA 94601
Date: Tuesday, December 23, 2014 6:00:19 PM
Attachments: [Attachment 1 and ftpUploadInstructions 2014-05-15.pdf](#)

Hello Mike:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Work Plan for Limited Phase II Subsurface Investigation* (Work Plan) dated June 26, 2014, prepared and submitted on your behalf by ERAS Environmental, Inc. (ERAS). The work plan was submitted in response to ACEH's directive letter dated May 28, 2014 and was uploaded to Geotracker on October 28, 2014. Thank you for submitting the Work Plan.

Based on ACEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comment below is incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: karel.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **LTCP Media Specific Criteria for Direct Contact and Outdoor Air Criteria:** The rationale describing the decision process to collect soil samples for laboratory analysis was not described in the Work Plan. Please ensure that soil samples are collected in the 0 to 5 and 5 to 10-foot intervals from each of the six borings to satisfy these criteria. Additionally, the *Soil Coring and Sampling Procedures in the Standard Operating Procedure – Direct Push Borings* states that prior to drilling, all boreholes will be hand dug to a depth of 4 to 5 feet bgs for the presence of underground utilities. Please ensure that soil sample integrity is maintained for the samples collected within the top five feet of the borings.
2. **Data Gap Investigation Work Plan and Site Conceptual Model:** Please address the following two items that were discussed in ACEH's May 28, 2014 Directive Letter under Technical Comment 9, but were not addressed in the Work Plan:
 - a. **Use of Laboratory Detection Limits when reporting "Non-Detect" results:** Please note that when submitting soil and groundwater samples to the laboratory for analysis, request the analytical laboratory to report the actual detection limits for all Non-Detected (ND) results. Similarly, in analytical summary tables, report the actual detection limit for all ND results. The use of ""ND" is not acceptable on laboratory analytical reports or in analytical summary tables.
 - b. **Preferential Pathway and Sensitive Receptor Study:** Please perform a Well Survey for recently installed vicinity water supply wells using well data sources from both Alameda County Public Works Agency (ACPWA) and Department of Water Resources (DWR). ACEH requests the identification of all active, inactive, standby, decommissioned (sealed with concrete), unrecorded, and abandoned (improperly decommissioned or lost) wells including monitoring, remediation, irrigation, water supply, industrial, livestock, dewatering, and cathodic protection wells within a ¼-mile radius of the subject site. Please inspect all available Well Completion Reports filed with the ACPWA and DWR in your survey, and perform a background study of the historical land uses of the site and properties in the vicinity of the site. Use the results of your background study to determine the existence of unrecorded/unknown (abandoned) wells, which can act as contaminant migration pathways at or from your site.

- c. **Surface Water Bodies Section of the SCM:** Please review and revise the Section as the closest downgradient water body is the Tidal Canal located 1,944 feet west-southwest of the site and Peralta Creek is located approximately 315 feet east and upgradient of the site.

TECHNICAL REPORT REQUEST

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

- **February 25 , 2015** – Updated SCM and Soil and Groundwater Investigation Report
File to be named: RO3133_SWI_SCM_R_yyyy-mm-dd

This report is 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.

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please send me an e-mail message at karel.detterman@acgov.org or call me at (510) 567-6708.

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PDF copies of case files can be downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>