

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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October 7, 2008

Mr. Steven Birch
Rodding Cleaning Services
2585 Nicholson Steet
San Leandro, CA 94577

Crane Works CX
2585 Nicholson Steet
San Leandro, CA 94577-4261

Mr. Rober Eckstein
Sketchley Trust
300 Ellinwood Way #260
San Leandro, CA 94577

Ms. Donna Proffitt
Bank of America Environmental Services
4820 Irvine Blvd.
Irvine, CA 92620

Subject: Fuel Leak Case No. RO00000020 (Global ID# T0600101153), Rodding Cleaning Services, 2585 Nicholson Street, San Leandro, CA

Dear Mr. Birch, Mr. Eckstein and Ms. Proffitt:

Alameda County Environmental Health Department (ACEH) staff has reviewed the case file and report entitled, "Site Conceptual Model", submitted on June 11, 2007 prepared by Versar Inc. In March 2007, Bank of America requested case closure for the site. ACEH has determined that additional information is needed prior to considering the case for regulatory case closure. High residual contamination in soil remains in place throughout the site at concentrations of up to 16,000 mg/kg TPHg and 32 mg/kg benzene. In addition, soil samples have not been collected below 6 feet bgs, indicating that additional site characterization is necessary to define the vertical extent of contamination beneath your site. More importantly, the risk based corrective action did not address the potential human health and environmental risks associated with soil and soil vapor contamination beneath your site.

This decision to deny case closure is subject to appeal to the State Water Resources Control Board (SWRCB), pursuant to Section 25299.39.2(b) of the Health and Safety Code (Thompson-Richter Underground Storage Tank Reform Act - Senate Bill 562). Please contact the SWRCB Underground Storage Tank Program at (916) 341-5851 for information regarding the appeal process.

Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to [mail to: steven.plunkett@acgov.org](mailto:mail:steven.plunkett@acgov.org)) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Source Area Characterization.** High levels of residual, sorbed phase contamination are present in soil throughout the source area at concentrations of up to 16,000 mg/kg TPHg and 32 mg/kg benzene. Moreover, soil samples have not been collected in the source area below a depth of 6 feet bgs, leaving the vertical extent of contamination beneath your site undefined. In addition, dissolved phase contamination has been detected onsite at concentrations of up to 1,300,000 µg/l TPHg, 39,000 µg/l benzene, 100,000 µg/l toluene, 40,000 µg/l methylbenzene, 200,000 µg/l total xylene and 14,000 µg/l MtBE. The TPHg and BTEX concentrations detected on-site in both soil and groundwater are significantly above the San Francisco Bay Regional Water Quality

Control Board's (SFBRWQCB) Environmental Screening Level (ESLs) for TPHg and BTEX, indicating that there may be a potential risk to human health and the environment. Given the lack of soil data collected below 6 feet bgs, we request that you prepare a work plan to evaluate the vertical extent of contamination beneath your site. Please submit the work plan according to the schedule outlined below.

2. **Site Conceptual Model/Risk Based Corrective Action (RBCA).** Versar submitted a site conceptual model in June 2007 without the identification of any data gaps. ACEH has identified the lack of soil vapor data as a significant data gap. Soil borings M-1 and M-2 installed in May 1998 detected elevated levels of hydrocarbon contamination in soil at concentrations of 790 mg/kg TPHg and 2.1 mg/kg benzene. More importantly, dissolved phase hydrocarbon contamination was detected at concentrations of up to 1,300,000 µg/l TPHg and 39,000 µg/l benzene, indicating that the potential for volatilization of dissolved phase contamination from shallow groundwater to the vadoze zone and potentially to indoor air must be evaluated. Please see technical comment 3 below for a more detailed discussion to evaluate potential soil vapor contamination.

In December 2000, Versar submitted a Risk Based Corrective Action (RBCA) to evaluate the potential human health risk associated with groundwater contamination beneath your site. Findings from the RBCA are derived from the 95% upper confidence limit and are based on groundwater analytical data collected from monitoring well MW-1. However, groundwater data used in the RBCA did not include significantly elevated concentrations of benzene detected in groundwater samples collected from soil borings M-2 and M-3. Results from the RBCA may not be representative of site conditions based on the concentrations of 39,000 µg/l benzene and 27,000 µg/l benzene detected in grab groundwater samples collected from soil borings M-2 and M-3, respectively. Furthermore, the RBCA did not evaluate the potential human health risk associated with soil or soil vapor contamination in the vadoze zone. Specifically, volatilization of contamination from groundwater or unsaturated soil to the indoor air exposure pathway has not been identified or evaluated. Based on the lack of soil data in the source area (no soil sampling below 6 feet bgs), and the lack of soil vapor sampling to evaluate potential vapor intrusion, ACEH does not agree with the conclusions that the site does not present an actionable risk to human health.

3. **Soil Vapor Assessment.** Versar contends that contact with soil and soil vapor will be limited because the site is capped and the plume is sited in an outdoor area. ACEH does not agree with the conclusion that the soil vapor pathway is not a concern, because soil vapor data has not been collected to determine the potential risk associated with soil vapor and the vapor intrusion pathway. In addition, we are concerned with the high concentrations of adsorbed and dissolved phase benzene contamination in soil borings M-2 and M-3, and the potential that the groundwater contamination plume may extend beneath the building located at 2591 Nicholson Street. Therefore, we request that you prepare a work plan to collect soil vapor samples near the property line adjacent to 2591 Nicholson Street.
4. **Interim Remedial Action.** Due to the high concentrations of residual pollution in soil and groundwater beneath your site, and to mitigate contamination in the source area remedial action is necessary. ACEH requests that you propose remedial measures to address the contamination in soil and groundwater beneath your site. Please present your proposal for site remediation in the Interim Remedial Action Plan requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Steven Plunkett), according to the following schedule:

- **December 15, 2008** – Work Plan
- **March 30, 2009** – Interim Remedial Action 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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to 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 Instructions." 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. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all 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 monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml).

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

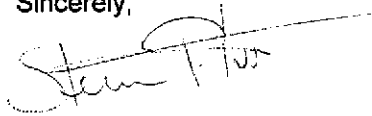
If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for

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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.

If you have any questions, please call me at (510) 383-1761 or send me an electronic mail message at steven.plunkett@acgov.org.

Sincerely,



Steven Plunkett
Hazardous Materials Specialist



Jerry Wickham, PG, CHg, CEG
Senior Hazardous Materials Specialist

cc: Tim Berger
Versar Inc.
7844 Madison Avenue
Fair Oaks, CA 95628

Donna Drogos, ACEH, Steven Plunkett ACEH, File