

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

December 5, 2007

Mr. Jack Ceccarelli  
Restructure Petroleum Marketing Service  
205 S. Hoover Blvd., Suite 101  
Tampa, FL 33609-905

Mr. Brain Cobb  
EZ Serve Petroleum Marketing  
100700 North I45, Suite 500  
Houston, TX 77037-1187

Vinod & Janak Bansal  
1777 Beach Park Blvd.  
Foster City, Ca 944041-1403

Levonard and Margret Thomsen  
PO Box 16290  
Houston, TX 77222

Mr. Aziz Kandahari  
Himalaya Trading Company Inc  
32785 Olympiad Court  
Union City, CA 94587-1905

Subject: Fuel Leak Case No. RO000023 (Global ID # T0600100483), EZ Serve #100877, 525 West A Street, Hayward, CA

Dear Mr. Ceccarelli and Mr. Cobb:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the documents entitled, "Work Plan for the Replacement and Installation of Monitoring Wells," "Well Destruction Report," and "Quarterly Groundwater Monitoring Report – First Quarter 2007" dated March 17, 2006, April 28, 2006 and May 10, 2007. Currently, the site is undergoing redevelopment as a gasoline service station.

Historically, dissolved phase petroleum hydrocarbon contamination was detected in groundwater collected from monitoring well MW-2 at concentrations of up to 60,000 ppb TPHg and 23,000 ppb benzene. MW-2 is an important component in the monitoring well network and must be replaced. This is not an extension of the due date for the monitoring well installation and reports for you site are late.

We request that you perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to [steven.plunkett@acgov.org](mailto:steven.plunkett@acgov.org)) prior to the start of field activities.

**TECHNICAL COMMENTS**

1. **Monitoring Well MW-2 Replacement.** MW-2 was decommissioned on April 6, 2006 with the concurrence of ACEH. However, our approval of the well decommissioning was contingent on a timely replacement of MW-2. In a correspondence dated March 22, 2006 ACEH approved the installation of replacement well MW-2A. To date, ACEH has not received a monitoring

well installation report or any other indication the replacement well has been installed. Consequently, your site is out of compliance with directive from this office. ACEH requires that monitoring well MW-2 must be replaced. The proposed location of MW-2A is sited on an adjacent property that will require an access agreement with the property owner prior to the installation of the replacement well. ACEH requests that you immediately pursue any offsite access agreements that may be necessary to expedite the well installation process. Furthermore, coincidence with the replacement of MW-2, ACEH approved the installation of two additional monitoring wells downgradient of the site. The purpose of the additional off site monitoring wells is to evaluate if dissolved plume is impacting the downgradient site located at 580 West A Street.

ACEH does not agree with the proposed monitoring well construction with a screened interval of 20 feet. We recommend the installation of monitoring wells designed with filter pack intervals of 5 feet or less, as these wells will be representative of depth discrete groundwater conditions. Upon completion of the monitoring well installation ACEH request that you submit all well construction design details, technical specifications and well logs in the report requested below. In addition, we request that a licensed professional surveyor survey all the new monitoring well locations. ACEH requests that a site map be prepared showing the location of the former UST, all onsite buildings, new monitoring locations and any other site feature that may be pertinent. Please present the results from the monitoring well installation in the report requested below.

2. **Soil Sampling and Analysis.** ACEH requests soil samples be collected from soil borings at changes in lithology, areas of obvious hydrocarbon contamination or when elevated PID readings occurs. If no changes in lithology, obvious contamination or elevated PID reading occurs, soil samples shall be collected at the capillary fringe and approximately 5 feet interval until the total depth of the boring is reached. All soil samples are to be submitted for the following laboratory analysis; TPHg, TPHd, BTEX and MtBE. Please present results from Monitoring Well Installation report requested below.
3. **Groundwater Sampling and Analysis.** The water samples are to be analyzed for TPHg and TPHd by EPA Method 8015M or 8260, BTEX, EDB, EDC, MtBE, TAME, ETBE, DIPE, TBA and EtOH by EPA Method 8260. Please present the results from groundwater monitoring and sampling in the report requested below.
4. **Hydrogeologic Cross Sections.** Please incorporate historical soil boring and monitoring well data including soil and groundwater analytical data, static water level and first water encountered, well screen interval, distinct geologic contacts and the location of former UST tank pit and appurtenance into a minimum of two cross sections that are parallel and perpendicular to groundwater flow. Please present the cross sections in the Monitoring Well Installation Report requested below.
5. **Geotracker EDF Submittals** Pursuant to CCR Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, beginning January 1, 2002, all permanent monitoring points utilized to collected groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD

83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in *Geotracker* (in PDF format). In order to remain in regulatory compliance, please upload all analytical data (collected on or after September 1, 2001), to the SWRCB's Geotracker database website in accordance with the above-cited regulation.

#### TECHNICAL REPORT REQUEST

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

- **January 15, 2008** – Soil and Groundwater Investigation Report

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) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy 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 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, electronic submittal of a complete copy of all reports is required in *Geotracker* (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

#### 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

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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 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 feel free to call me at (510) 383-1767.

Sincerely,



Steven Plunkett  
Hazardous Materials Specialist

cc: Thomas B. Lawrence  
Delta Consultants  
3164 Gold Camp Drive  
Rancho Cordova, CA 95670

Donna Drogos, ACEH, Steven Plunkett, ACEH, File