

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
ALEX BRISCOE, Director



August 16, 2010

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1777 Beach Park Blvd.
Foster City, CA 94404-1403

Subject: Request for Work Plan Addendum, Preferential Pathway Study, and SCM; Fuel Leak Case No. RO0000023 and GeoTracker Global ID T0600100483, EZ Serve #100877, 525 West A Street, Hayward, CA 94541

Dear Responsible Parties:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Report of Additional Site Assessment Activities and Technical Workplan for Additional Well Installation Activities*, dated October 29, 2009, and submitted on your behalf by GeoEnviro Services, Inc. (GES). The work plan that accompanied the investigation report proposed the installation of four groundwater wells in the site vicinity.

Based on ACEH staff review of the work plan is not currently approved; however, a work plan addendum is requested. The addendum is requested in order to allow the collection of additional data prior to the installation of wells. ACEH is in agreement that additional wells are required to adequately monitor the site; however, the collection of the additionally requested data will allow better well placement. Additionally, to understand the subject site it is crucial to understand the larger regional context, and to understand and monitor the progress of work at an adjacent site. That site is known as Prime Properties, with an address of 580 West A Street, located southwest of the subject site across West A Street. It appears that the plumes associated with the two sites have comeingled. As a consequence, ACEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

1. **Well Rehabilitation or Decommissioning** – Part of the purpose of the four recently proposed wells is to further define the extent of the soil and groundwater plumes in the site vicinity; however, there does not appear to have been an effort to relocate five wells that have been lost that would greatly help to define these plumes. As a consequence ACEH requests a significant effort to relocate the

wells and to either repair, or to destroy the wells, if rehabilitation is not appropriate. Wells MW-6, MW-8, MW-9, MW-10, and MW-11 have been lost due to road widening, site redevelopment, or site repaving. Because an effort to relocate each of these wells must ultimately be undertaken prior to site closure, it is appropriate to undertake these tasks at the present time. As proposed in the work plan, an effort to repair well MW-1A is also appropriate; however, it may be reasonable to delay this task and combine it with the repair, if any, of the additional wells.

Please note that wells MW-1A and MW-6 were surveyed to Geotracker survey standards and thus should be relatively easy to relocate. Please submit a work plan addendum to undertake tasks associated with well relocation, repair, or decommissioning, by date requested below.

2. **Groundwater Monitoring** – Review of the case file has resulted in a number of requests associated with groundwater monitoring at the site:
 - a. In the directive letter dated September 26, 2008, ACEH requested joint groundwater plume monitoring between the subject site and the Prime Properties site at 580 West A Street. A spot check of the last two groundwater monitoring events indicates this has not been acted upon. This site is out of compliance with this request and it remains a valid and useful request. Contact information for the consultant handling the Prime Properties site can be found at the end of this letter; please initiate coordination of the two sites.
 - b. As a consequence of joint groundwater monitoring, ACEH requests data sharing between the two sites be undertaken in order to facilitate site investigations. ACEH requests that gradient and concentration contour maps for the two sites be combined and depicted on site vicinity maps.
 - c. The site is currently being monitored for TPH as gas, BTEX, five fuel oxygenates, and has been monitored once for EDC and EDB. Please continue analyzing for these analytes. Additionally, groundwater at the site does not appear to have been monitored for TPH as diesel, despite the former presence of a diesel UST, and the detection of TPH as diesel in soil at elevated concentrations at the time of UST removals. ACEH requests the inclusion of TPH as diesel in the analytical suite, for both groundwater as well as soil, until it is apparent it is unnecessary. Cost savings may be achievable if a fuel fingerprint analysis is undertaken to determine how best to analyze soil or groundwater in the future so that the site is adequately characterized.
 - d. Wells MW-12 and MW-14 have been monitored discontinuously at various intervals since well installation in February 1995. Since approximately November 2001 the wells have essentially yielded nondetectable results. It is appropriate to reduce the sampling interval to an annual basis during the September groundwater monitoring event, until otherwise determined.

ACEH requests confirmation that these changes be acknowledged either in the next semi-annual groundwater monitoring event, or in the work plan addendum by the date identified below.

- 3 **Request for Preferential Pathway Study** – As currently mapped by consultants for Prime Properties, a large comingled vicinity plume appears to encompass both referenced sites. The large plume, including earlier elevated groundwater data from missing well MW-11 located at an estimated distance of 500 feet downgradient of the subject site, may be the result of preferential pathways in the site vicinity. Although some attempts at determining utility locations in the vicinity of the site has previously occurred, a complete preferential pathway study does not appear to have been conducted at the subject site previously. A previous well survey conducted in June 1988 does not appear to have located the five residential irrigation wells that have been documented to be impacted by the comingled plume (see March 2010 groundwater monitoring report and the December 2008 preferential pathway study for Prime Properties; both are available on Geotracker).

The purpose of the preferential pathway study is to locate potential migration pathways and conduits and determine the probability of a NAPL and/or a groundwater plume encountering preferential pathways and conduits that could spread contamination. We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, utility laterals, pipelines, and etc.) for vertical and lateral migration that may be present in the vicinity of the site.

Discuss your analysis and interpretation of the results of the preferential pathway study (including the detailed well survey and utility survey requested below) and report your results in the report requested below. The results of your study shall contain all information required by California Code of Regulations, Title 23, Division 3, Chapter 16, §2654(b).

a. Utility Survey

An evaluation of all utility lines, utility laterals, and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s) is required as part of your study. Please assimilate, reduce, and synthesize available information and maps, and generate appropriate (vicinity and / or site specific) maps and cross-sections illustrating the location and depth of all utility lines and trenches within and near the site and plume areas(s) as part of your study.

b. Well Survey

The preferential pathway study shall include a detailed well survey of all wells (monitoring and production wells: active, inactive, standby, decommissioned (sealed with concrete), abandoned (improperly decommissioned or lost); and dewatering, drainage, and cathodic protection wells) within a ¼ mile radius of the subject site. Please use DWR as well as Alameda County Public Works Agency resources. As part of your detailed well survey, please 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.

Please submit a preferential pathway study by the date identified below.

4 **Request for an SCM** - At this juncture, it may be advantageous to develop a site conceptual model (SCM), which synthesizes all the analytical data and evaluates all potential exposure pathways and potential receptors that may exist at the site, including identifying or developing site cleanup objectives and goals. At a minimum, the SCM should include:

- a. 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;
- b. A concise discussion of the on-site and off-site geology, hydrogeology, release history, source zone, plume development and migration, attenuation mechanisms, preferential pathways, and potential threat to down-gradient and above-ground receptors (e.g. contaminant fate and transport). Please include the contaminant volatilization from the subsurface to indoor/outdoor air exposure route (i.e. vapor pathway) in the analysis.
- c. The SCM shall include an analysis of the hydraulic flow system down-gradient from the site. Include rose diagrams for depicting groundwater gradients. The rose diagram shall be plotted on the groundwater contour maps and updated in all future reports submitted for your site. Include an analysis of vertical hydraulic gradients. Please note that these may change due to seasonal precipitation and groundwater pumping.

- d. Geologic cross section maps shall illustrate subsurface features, man-made conduits, and lateral and vertical extent of contamination;
- e. Plots of chemical concentrations versus time;
- f. Plots of chemical concentrations versus distance from the source;
- g. Summary tables of all chemical concentrations in different media (i.e. soil, groundwater, and soil vapor); and
- h. Well logs, boring logs, and well survey maps;
- i. Discussion of likely contaminant fate and transport.
- j. Identification and listing of specific data gaps that require further investigation during subsequent phases of work.
- k. Proposed activities to investigate and fill data gaps identified above (a work plan).
- l. Several other contaminant release sites exist in the vicinity of your site. Hydrogeologic and contaminant data from those sites may prove helpful in testing certain hypotheses for the SCM. Include a summary of work and technical findings from nearby release sites, in particular the Prime Properties site located down-gradient.

Please submit an SCM by the date identified below.

TECHNICAL REPORT REQUEST

Please submit the following deliverables and technical reports to ACEH (Attention: Mark Detterman), according to the following schedule:

- **October 18, 2010** – Work Plan Addendum and incorporation of groundwater monitoring changes
- **November 1, 2010** – SCM with Preferential Pathway Study
- **April 22, 2011** – Semi-Annual Groundwater Monitoring 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.

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
Hazardous Materials Specialist

Responsible Parties
RO0000023
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Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations
Electronic Report Upload (ftp) Instructions

cc: Joseph Schaaf, GeoEnviro Services, Inc., 5529 Kailas Street, Ventura, CA 93003
(sent via electronic mail to jschaaf@geoenviroservices.com)

Hugh Murphy, City of Hayward Fire Dept., 777 B Street, Hayward, CA 94541
(sent via electronic mail to Hugh.Murphy@hayward-ca.gov)

Danny Galang, City of Hayward Fire Dept., 777 B Street, Hayward, CA 94541
(sent via electronic mail to: Danny.Galang@hayward-ca.gov)

Robert Trujillo, Prime Properties, 916 Silver Spur Road, Suite 210, Rolling Hills Estates, CA 90274

Gary Aguilar, Hydro Analysis, Inc., 11100 San Pablo Ave., Suite 200-A, El Cerrito, CA 94530
(sent via electronic mail to gary@hydroanalysis.com)

Cherie McCaulou; 1515 Clay St, Suite 1400, Oakland, CA 94612
(sent via electronic mail to cmccaulou@waterboards.ca.gov)

Donna Drogos, ACEH, (sent via electronic mail to donna.drogos@acgov.org)
Mark Detterman, ACEH, (sent via electronic mail to mark.detterman@acgov.org)
Geotracker, e-File

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

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 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.

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| Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) | REVISION DATE: July 20, 2010 |
| | 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 (LOP and SLIC) 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 dehloptoxic@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 dehloptoxic@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.