

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

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

September 4, 2008

Ms. Farah Naz c/o  
Mr. Muhammad Jamil  
40092 Davis Street  
Fremont, CA 94538

Subject: Fuel Leak Case No. RO0000096 and Geotracker Global ID T0600143649, Eagle Gas, 4301 San Leandro Street, Oakland, CA 94601

Dear Ms. Naz:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted document entitled, "2008 Soil and Groundwater Investigation Work Plan," dated July 2, 2008 and received by ACEH on July 17, 2008. The Work Plan proposes:

- conducting an off-site passive soil vapor survey;
- installing off-site wells and one on-site well;
- determining whether the 42<sup>nd</sup> Avenue freeway on-ramp is a groundwater discharge area;
- performing a high-vacuum dual phase extraction (DPE) pilot test.

The proposed scope of work is generally acceptable with the exception of the proposed off-site passive soil vapor survey. As discussed in technical comment 1, we do not concur with the implementation of the proposed passive soil vapor survey. Well installation, determining whether the 42<sup>nd</sup> Avenue freeway on-ramp is a groundwater discharge area, and the DPE pilot test may be implemented provided that the technical comments below are addressed and incorporated during field implementation of the proposed activities. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

**TECHNICAL COMMENTS**

1. **Proposed Passive Soil Vapor Sampling (Gore Sorber<sup>®</sup>) Survey.** The proposed passive soil vapor sampling (Gore Sorber<sup>®</sup>) survey is proposed largely within areas where soil and groundwater sampling was previously conducted. The purpose of many of the proposed lines of passive soil vapor samples appears to be corroboration of previous soil and groundwater sampling results. Since the soil and grab groundwater sample data provide much more direct evidence of contamination than the proposed passive soil vapor sampling survey, corroboration of the soil and grab groundwater sample data does not appear to add significant value to the investigation. Therefore, we do not concur with the proposed passive soil vapor sampling (Gore Sorber<sup>®</sup>) survey. If you choose to implement the passive soil vapor survey, we recommend that the State Water Resources Control Board UST Cleanup Fund not reimburse you for the costs.

2. **Proposed Monitoring Wells.** The proposed locations for monitoring wells MW-3D, MW-9, MW-9D, MW-10, and MW-10D are acceptable. Pilot soil borings that are continuously sampled for logging purposes or CPT borings are to be used to select filter pack and screen intervals for the wells. In order to prevent the potential for cross-contamination, filter packs and screen intervals must not extend between shallow first-encountered groundwater and lower permeable intervals. In no case shall the filter pack or screen interval for the shallow wells extend below a depth of 25 feet bgs. The deeper wells shall be installed within the lower permeable unit typically encountered at depths of approximately 35 to 45 feet bgs and must not have screen intervals longer than 10 feet. Please present documentation of the well installation in the DPE Pilot Test Report below. Groundwater sampling results are to be incorporated into the quarterly groundwater monitoring reports requested below.
3. **Groundwater Monitoring Program.** The proposed elimination of quarterly groundwater sampling of wells MW-6, IS-1, IS-2, IS-3, IS-6, and EW-1 is approved. Please submit future groundwater monitoring results in the reports requested below.
4. **Dual-Phase Extraction Pilot Test.** The proposal to install one extraction well and three observation wells to conduct a DPE pilot test is generally acceptable and may be implemented. We concur with the proposal to install one extraction well and three observation wells for the proposed dual-phase extraction (DPE) pilot test. Targeting the clayey gravel layer for the DPE pilot testing is acceptable. However, our previous January 10, 2008 requested further discussion of the rationale for installation of the screen interval for the extraction well as shallow as 3.5 feet bgs. Review of historical soil analytical data indicates that most of the mass of contamination appears to be in the zone of seasonal water table fluctuations between depths of approximately 8 to 14 feet bgs. We request that the top of the screen interval for the DPE extraction and observation wells be no shallower than 5 feet bgs. If you disagree with this request and wish to proceed with installation of extraction and observation wells with well screens as shallow as 3.5 feet bgs, you must provide further justification including a discussion of the shallow contamination that is being targeted, how the potential for short circuiting with the surface will be addressed, and any additional steps that will be taken to assure the integrity of the surface seal. Please present results from the DPE pilot test in the Well Installation and DPE Pilot Test Report requested below.
5. **Sewer System Leaks.** As discussed in Appendix H of the 2007 Soil and Groundwater Investigation Report, two leaks were found in the sewer line from the station building. Please report on progress in repairing the leaks in the reports requested below.
6. **Potential Discharge to 42<sup>nd</sup> Avenue.** Please present the drawings of the 42<sup>nd</sup> Avenue On-ramp and your plans for evaluating whether contaminated groundwater from the site is discharging to this area in the Well Installation and DPE Pilot Test Report requested below.

#### **TECHNICAL REPORT REQUEST**

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

- **November 5, 2008** – Third Quarter 2008 Groundwater Monitoring Report

- **January 11, 2009** – Well Installation and DPE Pilot Test Report
- **February 5, 2009** – Fourth Quarter 2008 Groundwater Monitoring Report
- **May 5, 2009** – First Quarter 2009 Groundwater Monitoring Report
- **August 5, 2009** – Second Quarter 2009 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.

#### 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/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

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

Farah Naz  
RO0000096  
September 4, 2008  
Page 4

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 call me at (510) 567-6791 or send me an electronic mail message at [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org).

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297  
Senior Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032

Robert Nelson, Clearwater Group, 229 Tewksbury Avenue, Point Richmond, CA 94801

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>ISSUE DATE:</b> July 5, 2005
	<b>REVISION DATE:</b> December 16, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, 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

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- 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)

#### Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in Excel format. These are for use by assigned Caseworker only.

#### 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](mailto:dehloptoxic@acgov.org)  
or
    - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
  - 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 and Firefox browsers will not open the FTP site.
  - b) Click on File, then on Login As.
  - 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](mailto: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 at acgov.org. (e.g., [firstname.lastname@acgov.org](mailto: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)