



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

November 7, 2008

Paul Supple
Atlantic Richfield Company
(A BP Affiliated Company)
P.O. Box 1257
San Ramon, CA 94583

Subject: Fuel Leak Case No. RO0000100 and GeoTracker Global ID T0600100081, ARCO
#02035, 1001 San Pablo Avenue, Albany, CA 94706

Dear Mr. Supple:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Second Quarter 2008 Semi-Annual Ground-Water Monitoring Report," dated July 25, 2008, which was prepared by Broadbent and Associates, Inc. (BAI) and the document entitled, "Remediation Treatment Modification Proposal," prepared by URS Corporation. According to URS, a Soil Vapor Extraction (SVE) treatment system operated at the site from 1997 to 2004. System influent concentrations have been primarily non-detect in 2004 and the treatment system operation ceased. URS subsequently proposed that natural attenuation monitoring be performed at the site.

According to BAI, the groundwater analytical results collected on May 6, 2008 detected TPH-g, and benzene at 7,400 µg/L and 320 µg/L, respectively, in a groundwater sample collected from an off-site groundwater monitoring well S-5, installed by GeoStrategies, Inc. for the Shell station located at 999 San Pablo Avenue. Groundwater sample analytical results from the onsite wells detected significantly lower concentrations of hydrocarbons. Atlantic Richfield Corporation is currently waiting for ACEH to respond to URS's proposal.

ACEH requests that you address the following technical comments, perform the proposed work, and send us the technical work plans and reports described below.

TECHNICAL COMMENTS

1. **Confirmation Soil Sampling** – As mentioned above, a SVE system operated at the site from 1997 to 2004 to remediate free product that was detected from 1991 to 1993. Prior to system startup, concentrations of TPH-g and benzene in soil were detected as high as 4,300 mg/kg (in soil sample S-10-B16) and 36 mg/kg benzene (in soil sample S-1-PL4), respectively. Although URS reported that approximately 3,967.3 lbs of TPH-g and 257.5 lbs of benzene were removed from the site, the concentrations of residual hydrocarbons in soil appears unknown at the site. Please propose a scope of work to address the above-mentioned concerns and submit a work plan due by the date specified below.

2. **Groundwater Monitoring Wells and Hydrogeologic Setting** – Several groundwater monitoring wells at the site appear to have submerged well screened intervals. This appears especially evident in monitoring wells RW-1 and MW-1 through MW-3 (see Table 1 below). Monitoring well screens for wells MW-4 through MW-6 may be submerged occasionally based on the depth to groundwater measurements collected at the site, which have ranged from approximately 7 feet to 13 feet bgs.

Table 1: Monitoring Well Construction Details

Boring ID	MW ID	Screened Interval (ft, bgs)	Boring TD (ft, bgs)	Depth to GW (ft, bgs)
B-8	RW-1	11 to 26	29	7.36 to 13.11
B-9	MW-1	15 to 30	31.5	7.36 to 13.11
B-10	MW-2	20 to 29	33	7.36 to 13.11
B-11	MW-3	12.5 to 32.5	34.5	7.36 to 13.11
B-14	VW-1	5 to 17	18.5	7.36 to 13.11
B-15	VW-2	5 to 17	17.5	7.36 to 13.11
B-16	VW-3	4.5 to 9.5	15.5	7.36 to 13.11
B-17	VW-4	5 to 17	18.5	7.36 to 13.11
B-18	VW-5	4.5 to 14.5	16.5	7.36 to 13.11
B-19	VW-6	5 to 12.5	16.5	7.36 to 13.11
B-20	MW-4	8.5 to 25.5	29	7.36 to 13.11
B-21	MW-5	8.5 to 25	26.5	7.36 to 13.11
B-22	MW-6	8 to 25	26.5	7.36 to 13.11
B-23	VW-7	6 to 15	15.5	7.36 to 13.11
B-24	VW-8	6 to 15	15.5	7.36 to 13.11
B-25	VW-9	6 to 15	15.5	7.36 to 13.11
S-5	S-5	6 to 16	20.5	7.36 to 13.11

Since groundwater elevation is above the screened interval for several site groundwater monitoring wells and petroleum hydrocarbons have a specific gravity that is lower than water (therefore, float on water); concentrations of contaminants detected may not be representative of actual site conditions. Therefore, the monitoring wells appear to be incorrectly constructed, which may affect the contaminant concentrations detected in groundwater. Please evaluate and discuss the effect that groundwater elevations rising above monitoring well screens have on hydrocarbon concentrations for each monitoring well at the site. Please note that the Shell monitoring well S-5, which appears to be constructed with an appropriate screened interval from 6 to 16 feet bgs has detected the highest concentrations of hydrocarbons at the site and free product was detected at the subject site from 1991 to 1993 in RW-1. Please address the above-mentioned concerns and include your analysis in the subsurface investigation report requested below. Also please construct the proposed monitoring wells so that accurate groundwater concentrations, indicative of actual site conditions can be collected.

NOTIFICATION OF FIELDWORK ACTIVITIES

Please schedule and complete the fieldwork activities by the date specified below and provide ACEH with at least three (3) business days notification prior to conducting the fieldwork, including routine groundwater sampling.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Paresh Khatri), according to the following schedule:

- **January 5, 2009** – Soil and Water Investigation Work Plan
- **January 30, 2009** – Semi-annual Monitoring Report (4th Quarter 2008)
- **July 30, 2009** – Semi-annual Monitoring Report (2nd Quarter 2009)

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

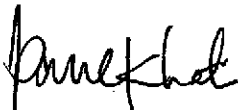
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

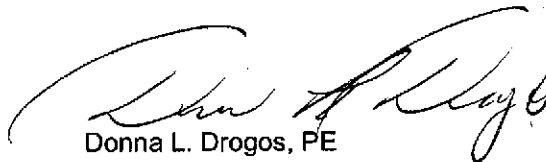
If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 777-2478 or send me an electronic mail message at paresh.khatri@acgov.org.

Sincerely,



Paresh C. Khatri
Hazardous Materials Specialist



Donna L. Drogos, PE
Supervising Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Tom Venus, Broadbent & Associates, Inc., 1324 Mangrove Ave., Ste 212, Chico, CA 95926
Donna Drogos, ACEH
Paresh Khatri, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: 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
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 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)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload)