

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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May 1, 2008

Mr. Bob Lawlor
RWL Investments, Inc.
4919 Tidewater Avenue, Unit B
Oakland, CA 94601-4914

Subject: Fuel Leak Case No. RO0000107 and Geotracker Global ID T0600100451, Di Salvo Trucking, 4919 Tidewater Avenue, Oakland, CA 94601

Dear Mr. Lawlor:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site, including the most recent document entitled, "*Remedial Action Plan, Heitz Trucking, 4919 Tidewater Avenue, Unit B, Oakland, California, 94601,*" (RAP) dated September 14, 2007 and prepared on your behalf by ETIC Engineering. The RAP proposes conducting a geophysical survey, sampling soil and groundwater in ten soil borings, and installation, development, and sampling of one monitoring well.

Implementation of the proposed geophysical survey is acceptable provided that technical comment 1 below is addressed during the geophysical survey. Prior to advancing the proposed soil borings and monitoring well, we request that you prepare a revised RAP in order to address the technical comments 2 through 9.

REQUEST FOR INFORMATION

Please submit copies of any reports you have documenting additional investigation activities or other work that are relevant to the fuel release or other unauthorized releases and not currently in ACEH case files. This includes Phase I environmental site assessment reports and site investigations conducted for potential real estate transactions. ACEH case files may be reviewed online using the ACEH website (<http://ehgis.acgov.org/dehpublic/dehpublic.jsp>).

TECHNICAL COMMENTS

1. **Geophysical Survey.** We concur with the proposal to conduct an electromagnetic and ground penetrating radar survey to locate the potential fuel hydrant dispenser lines remaining in place on the north side of the trucking terminal building. We request that you also utilize the geophysical survey to identify utilities and utility trenches that may act as preferential pathways.
2. **Vertical Delineation.** The RAP proposes advancing soil borings to a total depth of no more than 10 feet. We note that previous soil borings for environmental site investigations have generally extended to total depths of approximately 5 to 10 feet bgs. In April 2006, four soil borings were extended to depths of 30 feet bgs for geotechnical purposes. Based on encountered conditions in the borings, site stratigraphy consists of fill material overlying silty

clay (Younger Bay Mud) which in turn overlies stiff clays (Older Bay Mud) and/or alluvial fan deposits. No analyses for petroleum hydrocarbons appear to have been conducted on soil samples from the four geotechnical borings. We request that you extend several soil borings in order to assess the vertical extent of contamination. Specifically, we request that vertical delineation include collection of depth-discrete groundwater samples to evaluate whether groundwater in the alluvial fan deposits is contaminated. Please include plans to define the vertical extent of contamination and to sample groundwater within the alluvial fan deposits in the revised RAP requested below.

3. **Soil Sampling.** The proposed methods for soil sampling in the RAP appear to be adequate. We request that the field geologist continuously log recovered soil samples from each boring. Field screening is to be conducted using visual observations, odor, and measurements using a field photoionization detector (PID) fitted with an appropriate lamp and calibrated for the chemicals of concern. Soil samples are to be collected for laboratory analysis from any zones where visible staining, odor, or elevated PID readings are observed. If no visible staining, odor, or elevated PID readings are observed, the collection of soil samples at the proposed 5-foot interval is acceptable.
4. **Monitoring Well.** The RAP indicates that one monitoring well will be installed downgradient of the former UST excavation in the northern corner of the property with a location selected using results of soil and grab groundwater sampling. The depth of the well is to be based on encountered conditions. We have no objection to basing the depth of the well and screen interval on encountered conditions; however, the revised RAP requested below must include a description of the targeted interval for the well (entire thickness of fill material, upper portion of Younger Bay Mud, alluvial fan deposits, etc.), and the maximum thickness of the filter pack and screen interval. In addition, please expand the discussion of the rationale for proposed monitoring well locations including a description of how the proposed soil and groundwater sampling results will affect well placement.
5. **Site Conceptual Model and Discharge to Surface Water.** We concur with the finding in the Site Conceptual Model (SCM) that a future soil vapor investigation and intrusion study may be needed to evaluate potential health risks. We also concur that discharge to surface water could be a potentially complete exposure pathway. In the revised RAP requested below, please present plans to assess whether contaminated groundwater within the fill material discharges to surface water near the site.
6. **Water Levels in Observation Well OB-5.** The reported depth to water in observation well OB-5 during the groundwater sampling event on November 26, 2008 was 11.78 feet. The depth to water in observation wells OB-3, OB-4, and OB-6, ranged from 2.92 to 3.03 feet. In the revised RAP requested below, please discuss the vertical hydraulic gradient between the fill material and lower native soil. Please incorporate your conclusions regarding vertical hydraulic gradients into the site conceptual model and plans to assess groundwater discharge to surface water.
7. **Tidal Influence.** The RAP indicates that groundwater flow direction has been difficult to determine due to tidal influence. Please explain the basis for this statement. We note that all monitoring wells with the exception of OB-5 are screened within the fill material. Observation

of diurnal tidal influence in wells within the fill material would indicate that there is a hydraulic connection between groundwater in the fill material and surface water. Please include this discussion of observed tidal influence in the revised RAP requested below.

8. **Off-Site Extent of Groundwater Contamination.** Total petroleum hydrocarbons as diesel have been detected in groundwater samples collected near the northern and eastern boundaries of the site at concentrations of 4,100 µg/L (B-7) and 2,000 µg/L (B-1), respectively. In the revised RAP requested below, please review these data along with hydraulic gradient, fill thickness, and potential preferential pathways and present recommendations regarding assessment of the off-site extent of groundwater contamination.
9. **"Raised Debris Area."** Site figures in previous reports have identified a mounded area near the northern corner of the site as a "raised debris area." Please identify the origin and nature of this site feature.

TECHNICAL REPORT REQUEST

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

- **July 15, 2008** – Revised 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/cleanup/electronic_reporting).

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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) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



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

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Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

Maura Dougherty, ETIC Engineering, 2285 Morello Avenue, Pleasant Hill, CA 94523

Donna Drogos, ACEH
Jerry Wickham, 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)