ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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February 15, 2007

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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Mr. James Tracy
878 W. Hayden Ct.
Alpine, UT 84004

Dear Mr. Tracy:

Subject: Fuel Leak Case RO0000117, 1532 Peralta Street, Oakland, CA 94607

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the subject site including the January 31, 2007 Soil and Water Delineation Work Plan. The work plan responds to the County's 11/29/06 letter. We have the following technical comments we request you address when performing the proposed work.

TECHNICAL COMMENTS

1. Utilities and Preferential Pathway Study- The provided report states that given the shallow depth to groundwater and existence of utilities in the street, the utilities have the potential to act as preferential pathways for contaminant migration. This potential was not addressed in the proposed actions. It appears that the east-west storm water main in 16th St. would be the most likely impacted utility. Please consider investigation along this utility and submit as an addendum to your work plan. We concur that it is unlikely that the wells identified in your survey would be impacted by the fuel release, however, this cannot be confirmed until the full extent of the plume has been determined.

2. Data Gaps and Proposed Actions- Residual contamination above ESLs exist in soil and specific actions were proposed to further delineate this. It appears that the residual contamination identified from soil over-excavation and borings is located near the former dispenser island or adjacent to the former USTs. The estimated area of the highest strength of the petroleum plume mirrors the residual soil impacted area.

- The former pump island was not removed during the tank removals, therefore, the area underneath the pumps is unknown. The pump island is proposed for removal and two borings from beneath the former pump island and one along the product piping are proposed for sampling. Impacted soil will be removed and disposed if encountered. We concur with this proposed action.
- Four additional soil borings (B13-B16) are proposed to determine the lateral extent of residual contamination in the saturated soils. Samples from 3' and 6' are proposed for chemical analysis. We concur with boring B16, however, drilling of the other borings should be contingent on the results of other proposed work. Boring B15 would be warranted if the product piping and dispenser samples were significantly impacted, while it appears that B14 is not needed. B13 would be warranted if the proposed deep boring is significantly impacted. Minimally, field observations and screening results should be used to demonstrate the need for the other proposed borings. We also recommend determining the vertical extent of contamination in the proposed borings.

- The vertical profiling of groundwater contamination is proposed for characterization by drilling a deep Geoprobe boring, B12, to 40' bgs. The lithology will be continuously logged and soil samples collected every five feet, at zones of apparent water bearing capacity and obvious areas of contamination. Using this data, additional clustered hydropunch borings and depth discrete water samples collected from the zones of interest. We approve this proposal with the condition that B12 be moved to be located down-gradient of MW-5. See the attached figure for the recommended location.
- Three additional monitoring wells are proposed for further groundwater characterization. One of the wells is located up-gradient and two are down-gradient wells. We approve of their locations, however, their construction should take into account the data from the vertical profiling done in the proposed work. Please provide justification for their construction prior to their installation.
- Investigation for the existence of a waste oil tank is proposed since these tanks are typical of these aged service stations. It would appear that most likely location of a waste oil tank would be where the Sanborn maps indicate grease and oil. We recommend inspection of these areas and detection of magnetic anomalies as necessary.
- Soil and groundwater sample analysis should be analyzed similarly ie constituents and analytical method. Soil samples are proposed for TPHg and TPHd analysis using EPA 8015 and BTEX and MTBE by EPA 8021B. Groundwater samples, however, are proposed for TPHg analysis using TPH-Purgeables/GC/MS and MTBE, TBA and other VOCs by EPA method 8260B. Please propose and justify consistent analytes and analytical methods for soil and groundwater analysis in a work plan addendum. It appears that the analytical methods proposed may be the result of the TPHd analytical results in groundwater samples. The laboratory has not been reporting TPHd in groundwater if it does not resemble the diesel standard, however, they have noted that GC/MS analysis confirms that the compounds detected in the diesel range are not diesel, possible the "long chained" hydrocarbons described in this report. We will conservatively require that any material detected in the diesel range be reported as TPHd. Should you choose to further identify this material, you should also provide toxicity data.

TECHNICAL REPORT REQUEST

Please submit the following technical reports according to the following schedule:

- March 15, 2007- Work Plan Addendum for investigation of storm water utility and justification for soil and groundwater analytical methods
- April 15, 2007- 1st Q 2007 Groundwater Monitoring Report
- July 15, 2007- 2nd Q 2007 Groundwater Monitoring Report
- October 15, 2007- 3rd Q 2007 Groundwater Monitoring Report

ELECTRONIC SUBMITTAL OF REPORTS

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. Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was 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).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at barney.chan@acgov.org.

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) 567-6765.

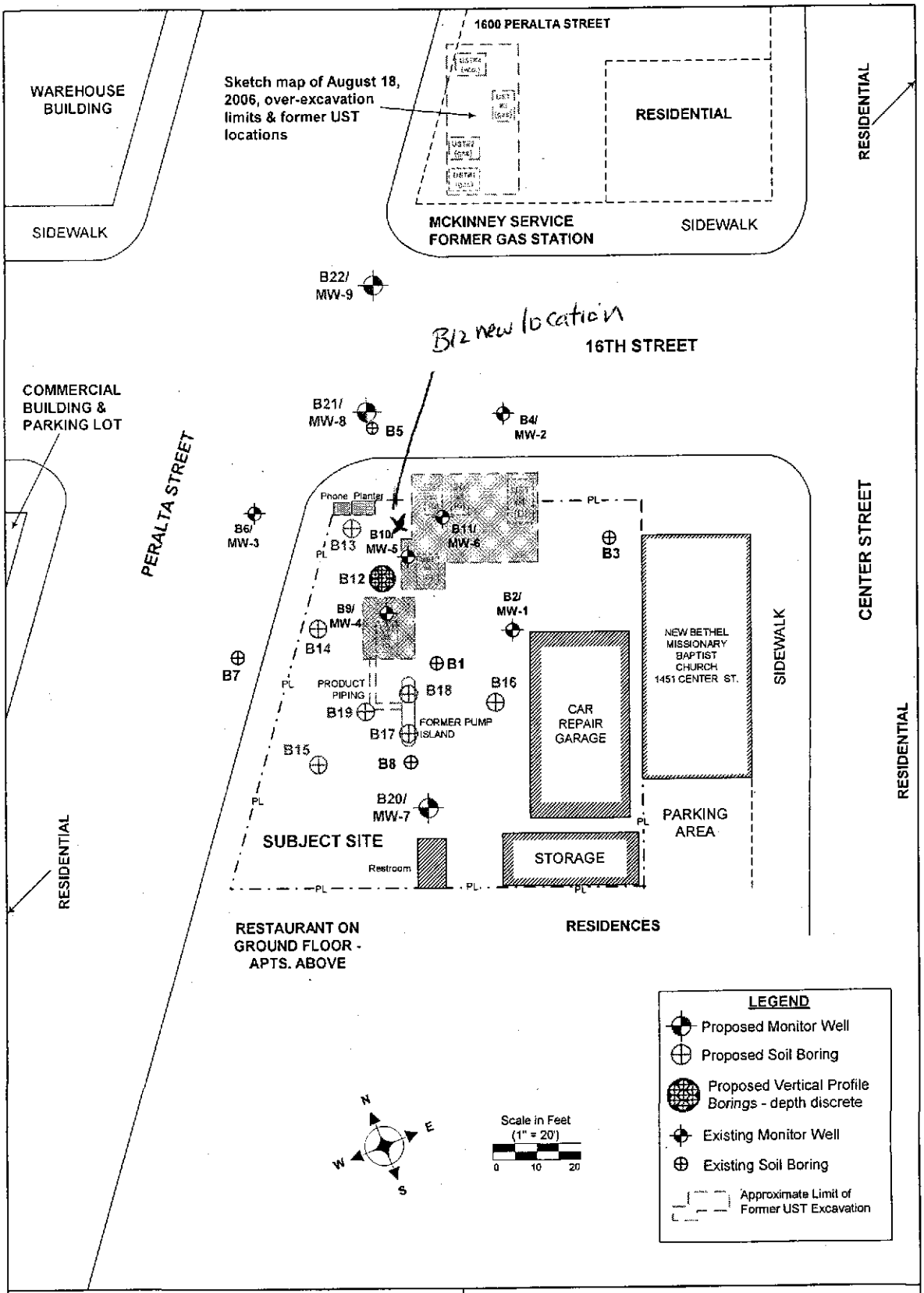
Sincerely,

Barney M. Chan
Hazardous Materials Specialist

Enclosure: revised Figure 17

cc: files, D. Drogos
Mr. Brent Wheeler, Golden Gate Tank Removal, Inc., 3730 Mission St., San Francisco, CA, 94110
Mr. Sunil Ramdass, SWRCB, 1001 I St., 17th Floor, Sacramento, CA 95814-2828

2_15_07 1532 Peralta St



GOLDEN GATE TANK REMOVAL, INC. 3730 Mission Street, San Francisco, CA 94110 Ph (415) 512-1555 Fx (415) 512-0964		**PROPOSED INVESTIGATION ACTIVITIES** **1532 Peralta Street, Oakland, California**	
GGTR Project No. 8757	*fn: 8757_Fig 17_Proposed Work.vsd*	*Figure By: SM / MY*	***Figure 17***