

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



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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January 8, 2009

Oscar & Mildred Lang  
RAS-CO Manufacturing  
1265 Primrose Drive  
San Leandro, CA 94578

Karniel Lang  
RAS-CO Manufacturing  
143 West Sunset Boulevard  
Hayward, CA 94541

Subject: Fuel Leak Case No. RO0000164 and GeoTracker Global ID RO0000164, RAS-CO Manufacturing, 413 West Sunset Boulevard, Hayward, CA 94541

Dear Mr. & Mrs. Lang and Mr. Lang:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site to determine whether the site qualifies for case closure consideration. According to our file, two underground storage tanks (USTs) consisting of one 250-gallon and one 500-gallon, were removed from the site on November 10, 1994. Soil sample analytical results detected total petroleum hydrocarbons (TPH) as gasoline (g) and benzene at concentrations of 5,000 mg/kg and 8.9 mg/kg respectively in soil sample S-4 collected at a depth of 7.5 feet below the ground surface (bgs). In March 1995, Tank Protect Engineering over-excavated approximately 150 cubic yards of impacted soil by extending the excavation boundaries by 3 to 5 feet laterally and increasing the depth to approximately 15 feet bgs. Confirmation soil samples detected TPH-g and benzene at concentrations up to 9,800 mg/kg and 13 mg/kg respectively. Since elevated concentrations of petroleum hydrocarbons were still detected, an additional 80 cubic yards of impacted soil was over-excavated increasing the excavation depth to 23 feet bgs in June 1995. Confirmation soil samples detected a maximum TPH-g concentration of 160 mg/kg at 15 feet bgs and a maximum benzene concentration was detected at 0.640 mg/kg at 20 feet bgs. A grab groundwater sample collected from the excavation pit detected TPH-g and benzene at concentrations of 10,000 µg/L and 35 µg/L, respectively. With approval from ACEH, the stockpiled soil was treated with a 5% hydrogen peroxide solution, aerated and replaced back into the excavation. In February 1996, an agricultural well located in the assumed down-gradient direction detected MTBE at a concentration of 1,200 µg/L by EPA Analytical Method 8015. In June 1999, groundwater monitoring well MW-1 was installed and sampled along with the agricultural well and analyzed for TPH-g, BTEX, and MTBE. Groundwater sample analytical results did not detect contaminants above the laboratory detection limit. However, it appears that the monitoring well was sampled only once.

Prior to case closure consideration, ACEH requests that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

**TECHNICAL COMMENTS**

1. **Regional Geologic and Hydrogeologic Setting** – MW-1 appears to be installed in the assumed down-gradient direction. Please justify that the locations of the monitoring MW-1

and the agricultural well are appropriate to adequately represent site conditions. In addition, please evaluate the agricultural well construction details to ensure that the construction of the well is appropriate to evaluate groundwater quality in the first water-bearing zone. Please address the above-mentioned concerns and submit the evaluation in the groundwater monitoring report due by the date specified below and include all well construction details.

2. **Groundwater Contaminant Plume Monitoring** – A groundwater monitoring well was installed in June 1999. Since its installation, only one groundwater monitoring event appears to have been conducted. In order to evaluate groundwater contaminant plume stability, consecutive groundwater monitoring must be conducted. Please conduct one groundwater monitoring event at the site to determine current site conditions, which includes collecting groundwater samples from the groundwater monitoring well onsite and the off-site agricultural well. Prior to collecting groundwater samples, please re-develop the monitoring wells so that groundwater samples representative of actual site conditions are collected. Please include TPH-g, benzene, toluene, ethylbenzene and xylenes (BTEX), lead scavengers (i.e. ethylene dichloride (EDC) and ethylene dibromide (EDB), fuel oxygenates methyl tertiary butyl ether (MtBE), ethyl tert-butyl ether (ETBE), tertamyl methyl ether (TAME), diisopropyl ether (DIPE), as well as alcohol compounds, such as tert-butyl alcohol (TBA to the analytical suite. At this time, please conduct a groundwater monitoring event at the site and submit the groundwater monitoring report by the dates specified below.
  
3. **GeoTracker Compliance** – A review of the case file and the State Water Resources Control Board's (SWRCB) GeoTracker website indicate that the site has not been "claimed" and electronic copies of analytical data have not been submitted, rendering the site to non-compliance status. Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. Also, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude to sub-meter accuracy using NAD 83. A California licensed surveyor may be required to perform this work. Additionally, pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3893, 3894, and 3895, beginning July 1, 2005, the successful submittal of electronic information (i.e. report in PDF format) shall replace the requirement for the submittal of a paper copy. Please complete the surveying and upload all applicable electronic submittal types such as the analytical data (EDF), survey data (GEO\_XY and GEO\_Z), and PDF reports from July 1, 2005 to current to GeoTracker by the date specified below. Electronic reporting is described below.

### **REQUEST FOR INFORMATION**

ACEH's case file for the subject site contains the following electronic reports as listed on our website (<http://www.acgov.org/aceh/lop/ust.htm>). You are requested to submit copies of all other reports related to environmental investigations for this property (including Phase I and Phase II reports) by **March 9, 2009**.

### **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:

- **February 23, 2009** – GeoTracker Compliance
- **April 30, 2009** – Quarterly Monitoring Report (1<sup>st</sup> 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](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**

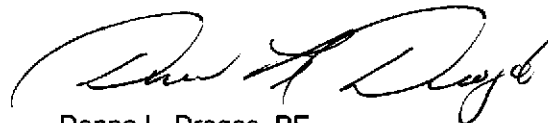
If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 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](mailto: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: Tank Protect Engineering, 2821 Whipple Road, Union City, CA 94587  
Donna Drogos, ACEH  
Paresh Khatri, 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)