

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
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September 26, 2008

Mr. Ed Hemmet and Mr. Mehrdad Dokhanchy
3840 San Pablo Avenue
Emeryville, CA 94608

Mr. Donald Rosenberg
2740 Ptarmigan Dr.
Walnut Creek, CA 94595-3121

Ms. Jacki Li
Award Motors Inc.
210 Scenic Dr.
Piedmont, CA 94611

Mr. Lloyd Kendall Jr.
Exchange Support Services
180 Grand Ave, St., #1385
Oakland, CA 94621

Ms. Rita Robinson
13199 Skyline Blvd.
Oakland, CA 94619

Subject: Fuel Leak Case No. RO0000182 and Geotracker Global ID T06019784055, Robinson Property/Mohawk Oil Company, 5630 San Pablo Avenue, Oakland, CA

Dear Mr. Hemmet, Etal:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the documents entitled, *Preliminary Investigation and Evaluation Report* dated July 25, 2008 and *Third Quarter of 2008 Groundwater Monitoring and Sampling Report* dated September 12, 2008 prepared by Enviro Soil Tech Consultants. The groundwater monitoring report indicates that total petroleum hydrocarbons as gasoline (TPHg) remains in groundwater beneath the site at a concentration of 1,000 micrograms per liter ($\mu\text{g/L}$). Benzene has declined to below the detection limit this quarter and methyl tertiary butyl ether (MTBE) is at 1.4 $\mu\text{g/L}$. However, some data gaps exist and need further investigation to progress to case closure. ACEH requests that you perform the work requested below, address the following technical comments, and submit the report requested below.

TECHNICAL COMMENTS

1. **Dissolved Contamination Plume Definition** – Data from the last monitoring report and the preliminary assessment report from AEI indicate that the extent of the groundwater plume may not be completely defined. The groundwater flow direction is reported to be to the south/southeast and east based on the current survey data and groundwater monitoring reports. If this is the case, then contaminant plume data from your site shows that the plume is undefined to the south/southeast and east. However, a southeasterly groundwater flow direction does not match the expected regional groundwater flow direction. The data appears to be even more anomalous when looking at the contaminant isoconcentration contours.

These indicate that contamination may be migrating to the north into Aileen Street or west toward San Pablo Avenue. Since no groundwater data is available in these directions, ACEH requests a work plan to assess the extent of the plume to the east, west and north. ACEH is concerned that contaminants may be migrating into the street and along preferential pathways to the north or west. A preferential pathway survey is requested below. Please submit your proposed boring locations in the work plan requested below.

2. **Source Area Characterization** – The maximum benzene concentration detected in soil was 1.5 milligrams per kilogram (mg/Kg). The sample was collected near the former dispenser island from a depth of eight feet below ground surface. No soil samples were collected below this depth and no samples were collected from the former tank pit locations which are shown in the sidewalk of San Pablo Avenue. Neither the lateral or vertical extent of contamination has been assessed in soil. Please submit a proposal to assess the source area adjacent to the USTs and to define the lateral and vertical extent of soil contamination in the work plan requested below.
3. **Groundwater Monitoring Frequency Reduction** – Your consultant's request to begin semi-annual monitoring in the first and third quarters is acceptable due to the low concentrations of volatile constituents that are present at the site. Please analyze for the following constituents: TPHg and TPHd by EPA Method 8015M, benzene, toluene, ethylbenzene, toluene, xylenes, and methyl tertiary butyl ether (MTBE), by EPA Method 8260. Please also include a rose diagram on your groundwater contour map which includes the historical groundwater flow directions. Update the rose diagram at each monitoring event. Please submit your groundwater monitoring reports according to the schedule below.
4. **Geologic Cross-Sections** – Please prepare geologic cross-sections for this site. Ensure that one is parallel and the other, perpendicular to the plume axis. At a minimum, include soil data, first encountered and static groundwater levels, and the former tank pit locations on the cross-sections in the work plan requested below. Please also update them when new data is obtained.
5. **Preferential Pathway Evaluation** – The purpose of the preferential pathway study is to locate potential migration pathways and conduits and determine the probability of the NAPL and/or plume encountering preferential pathways and conduits that could spread contamination. We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for vertical and lateral migration that may be present in the vicinity of the site.

Discuss your analysis and interpretation of the results of the preferential pathway study (including the well survey and utility survey requested below) and report your results in the work plan requested below. The results of your study shall contain all information required by California Code of Regulations, Title 23, Division 3, Chapter 16, §2654(b).

a. Utility Survey

An evaluation of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s) is required as part of your study. Please include maps and cross-sections illustrating the location and depth of all utility lines and trenches within and near the site and plume areas(s) as part of your study.

b. Well Survey

The preferential pathway study includes a well survey of all wells (monitoring and production wells: active, inactive, standby, decommissioned (sealed with concrete), abandoned (improperly decommissioned or lost); and dewatering, drainage, and cathodic protection wells) within a ¼-mile radius of the subject site.

6. **Soil and Water Disposal** – There are no records of soil disposal for the installation of the wells. Please provide the manifests for the disposal of both soil and groundwater. Your consultant requested that the soil samples be sent back to them after analysis. I would like to ensure that these soil and samples were disposed of properly. Please submit a copy of the waste manifests for the soil and water disposal in the work plan requested below.
7. **Survey Data** – Your consultant did not submit a copy of the monitoring well survey coordinate data with the report nor was a copy submitted to the Geotracker website as per requirements. Also the elevation survey is reported in NGVD29. The Geotracker requirements are as follows: 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. Please submit a copy of the well survey which meets the Geotracker requirements.

TECHNICAL REPORT REQUEST

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

- **January 26, 2009** – Work Plan, Preferential Pathway Study w/ cross-sections.
- **February 26, 2009** – First Quarter Groundwater Monitoring Report.
- **August 26, 2009** – Third Quarter 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

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight

Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." 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).

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

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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) 639-1287 or send me an electronic mail message at barbara.jakub@acgov.org.

Sincerely,

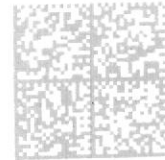


Barbara Jakub, P.G.
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Frank Hamedi-Fard, Enviro-Soil Tech Consultants, 131 Tully Road, San Jose, CA 95111
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032
Donna Drogos, ACEH
Barbara Jakub, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY
Department Of Environmental Health
Environmental Protection Division
1131 Harbor Bay Parkway
Alameda, CA 94502-6577



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ENVIRONMENTAL HEALTH SERVICES

Mr. Lloyd Kendall Jr.
Exchange Support Services
180 Grand Avenue, Suite 1385

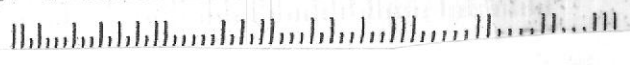
555 12th St.
Suite 1280
Oakland CA 94607

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BC: 94502654031 *1405-12695-29-38

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94502@6540



**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)