



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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April 6, 2012

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

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

Subject: WORK PLAN REVIEW for Fuel Leak Case No. RO0000182 and GeoTracker Global ID T06019784055, Robinson Property / Mohawk Oil Co., 5630 San Pablo Ave., Oakland, CA 94608

Dear Mr. Hemmet, Etal:

Thank you for the recently submitted document entitled, *Work Plan for Further Soil and Groundwater Investigation* dated March 31, 2009, which was prepared by Enviro Soil Tech Consultants for the subject site. Alameda County Environmental Health (ACEH) staff has reviewed the case file including the above-mentioned work plan for the above-referenced site. The work plan proposes installing both borings and wells at the site to evaluate the lateral extent of hydrocarbons at the site.

ACEH generally concurs with the scope of work. However, we request some modifications to the boring locations and some clarifications to the plan. Please address the technical comments below and submit the requested reports by the due date requested below.

TECHNICAL COMMENTS

1. **Soil and Groundwater Characterization** – Installation of groundwater monitoring wells before grab groundwater samples are analyzed can lead to poor well placement. Especially in an area where groundwater gradient appears to flow radially inward to the site in three directions. We recommend that the transect borings be advanced and groundwater analyzed before selecting the location for permanent monitoring and groundwater remediation wells as well as the depth of the screens. Please submit an updated map and work plan modifications in the brief addendum requested below.
2. **Contaminant Source Area Characterization** – ACEH requested that the vertical extent of contamination be determined near AEI-1, yet no mention is made of the depth of the proposed soil borings. Please relocate boring B-1 closer to AEI-1 and ensure that samples are collected and analyzed to determine the vertical extent of contamination in soil and

groundwater in the source area. Please submit a modified boring location map with details of the planned vertical delineation in the addendum requested below.

3. **Boring Transects** – Please advance one boring to the west of each UST location on San Pablo Avenue, in addition to the proposed transect on the sidewalk. Also since groundwater flow direction is radial to the center of the site, borings B9 through B11 and the boring for STMW-10 may be unnecessary. Use the results of the borings from transect B-6 through B-8 to determine if borings are needed on the north side of Aileen Street. Please submit an updated map with modified boring locations by the date requested below.
4. **Groundwater Contaminant Plume Monitoring** – Groundwater monitoring was discontinued in 2009 without concurrence from ACEH. Please redevelop the wells at this time and sample the wells on a semi-annual basis. Include details of well redevelopment activities in the Soil and Water Investigation requested below.
5. **Monitoring Well Survey** – The groundwater monitoring wells are not shown on the Geotracker map meaning that either the survey data has not been submitted or the survey data that was submitted is not in accordance with Geotracker standards. Please resurvey the wells in compliance with Geotracker requirements 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. In addition, if this changes the elevations dramatically, please recalculate the groundwater flow direction for previous quarters.
6. **Cross-Sections** –ACEH's September 26, 2008 letter requested that geologic cross-sections be prepared. Three cross-section lines were placed on the map but the cross-sections were not submitted with the report. Please ensure that completed cross-sections are included in the soil and water investigation report requested below and show the soil lithology, analytical data, high and low groundwater elevations, former tank pit locations, and utility conduits that were identified in the conduit study.
7. **Boring Permits** – Currently boring permits are administered by Alameda County Public Works Department not ACEH. Please contact them for boring permits.

REQUEST FOR INFORMATION

ACEH's case file for the subject site does not contain the Phase I report that is noted to have been performed by AEI in June 2003. Please obtain and submit this report to the ACEH ftp site as described below by **April 30, 2012**. Please also submit copies of all other reports related to environmental investigations for this property that are not on our website (<http://www.acgov.org/aceh/lop/ust.htm>).

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TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Barbara Jakub), according to the following schedule:

- **April 30, 2012** – Upload of all Reports not on ACEH's website
- **June 8, 2012** – Brief Work Plan Addendum
- **August 8, 2012** – Soil and Water Investigation

If you have any questions or concerns regarding this correspondence or your case, please call me at (510) 639-1287 or send me an electronic mail message at barbara.jakub@acgov.org.

Sincerely,

Barbara J. Jakub, P.G.
Hazardous Materials Specialist

Enclosure: Responsible Party(ies) Legal Requirements/Obligations
ACEH Electronic Report Upload (ftp) Instructions

cc: Frank Hamedi-Fard, Enviro Soil Tech Consultants, 131 Tully Road, San Jose, CA 95111 (*Sent via E-mail to: info@envirosoiltech.com*)
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (*Sent via E-mail to: lgriffin@oaklandnet.com*)
Donna Drogos, ACEH (*Sent via E-mail to: donna.drogos@acgov.org*)
Barbara Jakub, ACEH (*Sent via E-mail to: barbara.jakub@acgov.org*)
GeoTracker
File

Attachment 1

Responsible Party(ies) Legal Requirements/Obligations

REPORT REQUESTS

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.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

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

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection.**
- 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)

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 deh.loptoxic@acgov.org
 - 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, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - 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 deh.loptoxic@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 @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) If site is a new case without an RO#, use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.