



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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August 14, 2015

Mr. Keith Simas (Sent via e-mail to: xtraoil@sbcglobal.net)
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

Subject: Fuel Leak Case No. RO0000191 and GeoTracker Global ID T0600101803, Xtra Oil, 1701 Park Street, Alameda, CA 94501

Dear Mr. Simas:

Alameda County Environmental Health (ACEH) staff has re-evaluated the directives in our July 28, 2015 Directive Letter based on information provided in a July 28, 2015 e-mail correspondence with Paul King, P&D Environmental, Inc. (P&D) and a telephone conversation with Paul King on August 14, 2015. During our evaluation ACEH reviewed the following documents:

- *Corrective Action Plan (CAP)*, October 14, 1999, Alisto Engineering Group
- *Remedial Action Work Plan*, October 24, 2007, P&D Environmental, Inc.
- *Site Conceptual Model Report*, October 8, 2010, P&D Environmental, Inc.
- *Corrective Action Plan*, October 11, 2010, P&D Environmental, Inc.
- *Groundwater Extraction Feasibility Test Work Plan*, April 15, 2011, P&D Environmental, Inc.
- *Well Installation Report*, July 11, 2011, P&D Environmental, Inc.
- *Subsurface Investigation Report*, July 11, 2011, P&D Environmental, Inc.
- *Chemical Oxidation Injection Feasibility Test Work Plan*, December 19, 2011, P&D Environmental, Inc.
- *In Situ Chemical Oxidation Feasibility Test Work Plan*, February 7, 2014, P&D Environmental, Inc.
- *In Situ Chemical Oxidation Feasibility Test Work Plan Addendum*, June 9, 2014, P&D Environmental, Inc.
- *Semi-Annual Groundwater and Baseline Water Quality Monitoring and Sampling Report*, October 1, 2014, P&D Environmental, Inc.
- *Ozone Sparging Pilot Test Report*, October 13, 2014, P&D Environmental, Inc.
- *Post-Sparging Pilot Test Rebound Evaluation Report*, November 13, 2014, P&D Environmental, Inc.

Based on our review, ACEH considers that the above listed documents constitute the requisite elements of a Feasibility Study/Corrective Action Plan for the subject site. Therefore, at this juncture, please prepare a Corrective Action Implementation Plan as described in Technical Comment 1 below. Additionally, a review of the case files indicate that public participation for the FS/CAP has not been conducted. Therefore, please submit a draft Fact Sheet as described in Technical Comment 2.

TECHNICAL COMMENTS

1. Request for a Corrective Action Implementation Plan: ACEH requests that you prepare a concise Corrective Action Implementation Plan which includes, but is not limited to, the following items. Please utilize tables and figures to present the data:

- Description of the selected remedy including anticipated length of remedial action and cleanup goals;
- Implementation of the selected corrective action;
- Baseline groundwater monitoring parameters;
- Strategy for monitoring groundwater quality and ozone by-products on and off site;

- Engineering Design including Radius of influence (ROI) calculations for all injection points;
- Table summarizing injection and monitoring well construction;
- System piping and plumbing figures;
- Protection strategy of ozone generator equipment from service station activities;
- Post remediation groundwater monitoring and sampling schedule to monitor rebound;
- Injection Well Installation Report;
- Construction Quality Assurance (CQA) Plan;
- CAP Implementation schedule including adequate ACEH review periods.

2. Public Participation: Public participation is a requirement for the Corrective Action Plan process to notify potentially affected stakeholders who live or own property in the surrounding area of the proposed remediation. We request that you submit a Draft Fact Sheet for ACEH review. Upon ACEH approval of a Draft Fact Sheet, we will request that you send the Fact Sheet to an address list provided by ACEH. Public comments on the proposed remediation will be accepted for a 30-day period. Following the end of the public comment period, any comments received including ACEH's comments described below, must be addressed and incorporated into a Final CAP.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **October 15, 2015** – Third Quarter Groundwater Monitoring and Sampling Report
File to be named: RO191_GWM_R_YYYY-MM-DD
- **October 30, 2015** – Corrective Action Implementation Plan
File to be named: RO191_CAIP_R_YYYY-MM-DD
- **October 30, 2015** – Draft Fact Sheet
File to be named: RO191_CAP_PP__L_YYYY-MM-DD
- **January 15, 2016** – Fourth Quarter Groundwater Monitoring and Sampling Report
File to be named: RO191_GWM_R_YYYY-MM-DD

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.

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Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please send me an e-mail message at karel.detterman@acgov.org or call me at (510) 567-6708.

Karel Detterman, PG
Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations and Electronic Report Upload (ftp) Instructions

cc: Paul King, P&D Environmental, Inc. (sent via E-mail to: PDKing0000@aol.com)
Dilan Roe (sent via E-mail to: dilan.roe@acgov.org)
Karel Detterman (sent via E-mail to: karel.detterman@acgov.org)
Electronic File, GeoTracker

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: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 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.