



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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March 4, 2009

Ms. Janet Heikel  
Olympian Oil Company  
1300 Industrial Road #2  
San Carlos, CA 94707

Mr. Geoffrey Ferrar  
George Harrison Trust  
PO Box 1701  
Chico, CA 95927

Subject: Fuel Leak Case No. RO0000193, Former Olympian Service Station #11, 1435 Webster Street, Alameda CA 94501

Dear Ms Heikel and Mr. Ferrar:

Alameda County Environmental Health Department (ACEHD) staff has reviewed the case file and report entitled, "Site Investigation and Remediation Work Plan", dated September 1, 2008 and received November 25, 2008 and prepared on your behalf by TEC Accutite (TEC). The work plan proposes the installation of five soil borings for offsite dissolved phase plume delineation, soil vapor sampling and the installation of one groundwater monitoring well. ACEH generally concurs with the recommendations in the work plan provided the following comments are incorporated prior to the implementation of the work plan. Based on ACEHD staff review of the documents referenced above, we request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance notification to this office (e-mail preferred to [steven.plunkett@acgov.org](mailto:steven.plunkett@acgov.org)) prior to the start of field activities.

#### **TECHNICAL COMMENTS**

1. **Soil Vapor Sampling.** TEC has proposed the installation of four soil vapor monitoring points to evaluate the soil vapor migration pathway. Proposed vapor point VMP-1 is located within the clean back fill of the former tank pit, thus it is unlikely to detect contamination. Please relocate proposed VMP-1 adjacent to soil boring CB-17 (20 ppm benzene) and install VMP-2 in undisturbed, native soil. To evaluate the potential risk associated with vapor intrusion to the adjacent residences, one additional soil vapor point in the vicinity of MW-3 is necessary.

TEC has proposed the collection of soil vapor samples from 4.5 feet bgs using tedlar bags and TO-15 soil vapor analysis. We concur with the proposed soil vapor sampling depth of 4.5 feet below ground surface (bgs) using TO-15 sample analysis. In order to evaluate vertical attenuation of soil vapor contamination in the vadose zone multiple soil vapor sampling depths are necessary. Please collect soil vapor samples from the unsaturated sediment above the water table (approximately 8 feet bgs) in addition to soil vapor samples from 4.5 feet bgs. However, the collection of soil vapor samples in tedlar bags is unacceptable. We require that you perform the soil vapor investigation in accordance with the DTSC 2003 Advisory for Active Soil Gas Investigations and submit the results of the investigation according to the schedule outlined below.

2. **Soil Boring Installation.** TEC has proposed the installation of five offsite soil borings (with two additional step-out borings if necessary) to a maximum depth of 15 to 20 feet bgs, with one soil sample collected per soil boring. We request that three soil borings be advanced initially (B-1-, B-20 and B-22), if field observations and PID readings detect contamination additional step out borings (B-21 and B-23) should be advanced. At a minimum two soil samples are to be collected from each boring, one sample collected at the capillary fringe and one soil sample from the total depth of the boring. In addition, soil samples must be collected and analyzed at

areas of elevated PID readings, obvious odor or staining and changes in lithology. ACEH generally concurs with the proposed boring locations and soil sample analysis. Please present the results from the soil and groundwater investigation in the report requested below.

3. **Monitoring Well Installation.** TEC recommends the installation of one groundwater monitoring well to a depth of 20 feet bgs, with the appropriated screen interval base on subsurface hydrogeologic conditions. ACEH generally concurs with monitoring well location and soil sampling and analysis. Please present results for the monitoring well installation in the report requested below.

### **TECHNICAL REPORT REQUEST**

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Steven Plunkett), according to the following schedule:

- **May 30, 2009** – Soil and Groundwater Investigation 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**

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](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.

#### LANDOWNER NOTIFICATION REQUIREMENTS

Pursuant to California Health & Safety Code Section 25297.15, the active or primary responsible party for a fuel leak case must inform all current property owners of the site of cleanup actions or requests for closure. Furthermore, ACEH may not consider any cleanup proposals or requests for case closure without assurance that this notification requirement has been met. Additionally, the active or primary responsible party is required to forward to ACEH a complete mailing list of all record fee title holders to the site.

#### UNDERGROUND STORAGE TANK CLEANUP FUND

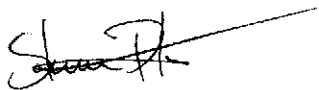
Please be aware that you may be eligible for reimbursement of the costs of investigation from the California Underground Storage Tank Cleanup Fund (Fund). In some cases, a deductible amount may apply. If you believe you meet the eligibility requirements, we strongly encourage you to call the Fund for an application.

#### 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) 383-1767.

Sincerely,



Steven Plunkett  
Hazardous Materials Specialist



Donna L. Drogos, PE  
Supervising Hazardous Materials Specialist

cc: Morgan Reed  
TEC Accutite  
262 Michelle Court  
San Francisco, CA 94080

Donna Drogos, Steven Plunkett, File