



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
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November 29, 2011

Mr. Reed Rinehart
Rino Pacific
2401 North State Street
Ukiah, CA 95482

Tony Muir and Lillie Earls
P.O. Box 328
Wilsonville, OR 97070-328

Subject: Review of Feasibility Study Report for Fuel Leak Case No. RO0000234 and GeoTracker Global ID T0600102136, Rino Pacific/Oakland Truck Stop, 1107 5th Street, Oakland, CA 94607

Dear Mr. Rinehart:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the most recent document entitled, "*Remediation Feasibility Study Report*," dated October 10, 2011 (FS). The FS, which was prepared on behalf of Rino Pacific LLC by Advanced GeoEnvironmental, Inc., describes remedial alternatives to cleanup petroleum hydrocarbons in soil and groundwater. Based on the alternatives presented, the FS recommends a pilot study for in-situ chemical oxidation (ISCO). As discussed in the technical comments below, we do not concur with conducting a pilot study for ISCO at this time. Therefore, we request that you prepare a Draft Corrective Action Plan (CAP) that addresses the technical comments below.

TECHNICAL COMMENTS

1. **ISCO Pilot Study.** The FS proposes an ISCO pilot study that would consist of four weekly injections of a hydrogen peroxide solution and a pH adjuster using existing monitoring wells MW-7 and MW-8. This proposed ISCO pilot study is not an acceptable option for the following reasons:
 - A significant mass of petroleum hydrocarbons is present from ground surface to depths of more than 20 feet bgs. The use of ISCO is not likely to be cost effective for the remaining hydrocarbon mass and will not treat soils above the water table outside the immediate area of the borehole.
 - Wells MW-7 and MW-8 appear to be installed partially within a peat layer. The peat can be expected to react with the oxidant in the area of the borehole and increase the necessary volume of oxidant used.
 - The pilot study is proposed at locations within the treatment area of the ozone sparging system. It is not clear why ISCO using well injections with Fenton's reagent are expected to effectively remediate an area previously treated by ozone sparging.
 - There are no monitoring locations outside the injection wells that are close enough to the injection wells to monitor results of the pilot study.

In the Revised FS requested below, please revise or supplement the ISCO alternative to address the above limitations or propose an alternative technology.

2. **Expanded Scope of FS.** The FS evaluates three remedial options: ISCO, enhanced aerobic bioremediation, and groundwater extraction/dual-phase extraction. None of these three alternatives appears to be well-suited for the specific conditions at the site. Therefore, we request that you expand the scope of the FS to include the following:
- Receptor information including likely future land use scenarios, adjacent land use and sensitive receptors, and potential groundwater receptors.
 - One of the alternatives should include excavation and off-site disposal as the primary method.
 - The second alternative should include land use controls in the form of a deed restriction, evaluation of potential off-site impacts that includes soil vapor sampling, and monitored natural attenuation.
 - Additional in-situ remedial alternatives including the most promising alternatives considered in the October 11, 2011 FS.
 - An evaluation of each of the remedial alternatives including discussion of feasibility, cost effectiveness, estimated time to reach cleanup goals, and limitations for each remedial alternative.

TECHNICAL REPORT REQUEST

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

- **January 6, 2012** – Well Installation and Semi-annual Groundwater Monitoring Report
- **February 10, 2012.** Revised Feasibility Study
- **July 10, 2012** – Semi-Annual Groundwater Monitoring Report

If you have any questions, please call me at 510-567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Attachment: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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cc: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 2032 (*Sent via E-mail to: lgriffin@oaklandnet.com*)

Brian Millman, GeoEnvironmental, Inc., 837 Shaw Road, Stockton, CA 95215 (*Sent via E-mail to: bmillman@advgeoenv.com*)

Donna Drogos, ACEH (*Sent via E-mail to: donna.drogos@acgov.org*)

Jerry Wickham, ACEH (*Sent via E-mail to: jerry.wickham@acgov.org*)

GeoTracker, e-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.