

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

February 22, 2008

Mr. Neal Fujita  
East Bay Regional Park District  
2950 Peralta Oaks Ct.  
Oakland, CA 94605

Subject: Fuel Leak Case No. RO0000246 and Geotracker Global ID T0600100489, Redwood Regional Park, 7867 Redwood Road, Oakland, CA 94619

Dear Mr. Fujita:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above referenced site including the recently submitted documents entitled, "Q3/Q4 Bioventing Status and Annual Summary Report," dated January 4, 2008, "Fourth Quarter 2007 Groundwater Monitoring and Annual Summary Report," dated January 8, 2008, and "Response to Technical Comments by ACEH and Workplan for Bioventing System Augmentation Redwood Regional Park Service Yard Site - 78678 Redwood Road, Oakland, California," dated February 7, 2008. Stellar Environmental Solutions, Inc. prepared the three reports on behalf of East Bay Regional Park District.

The Work Plan for Bioventing System Augmentation proposes augmentation of the existing bioventing system followed by one year of operation with additional testing prior to moving forward with evaluation and implementation of other remedial alternatives. Installation of two additional vent wells in the area of the former USTs is proposed to treat residual contamination in the source area. The proposal by East Bay Regional Park District to augment and operate the expanded system for one year is acceptable. Evidence that the system augmentations are effective and capable of achieving site cleanup must be demonstrated at the end of one year. If the data collected at the end of one year of operation indicate that the augmented system is not effective in measurably reducing TPH concentrations in groundwater within the central portion of the plume, an additional remedial technology must be evaluated for the site.

Therefore, the proposed scope of work may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed.

We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

**TECHNICAL COMMENTS**

1. **Vent Well Locations.** The proposal to remove non-responsive vent well VW-3 and install two additional vent wells is acceptable. However, the current proposed locations for vent wells VW-4 and VW-5 are near the southern and northern limits, respectively, of the source

area. In order to achieve greater air flow in the areas where the greatest levels of contamination were previously observed, we request that you move the proposed location of vent well VW-4 approximately 10 feet north and proposed location of vent well VW-5 approximately 10 feet southeast as shown on Attachment A: Revised Vent Well Locations.

2. **Vent Well Depths.** The borings for the vent wells are to be logged continuously during drilling. The depth to the top of the vent well screens are to be adjusted in the field as necessary to assure that the tops of the screens are in native soil below the base of the excavation backfill. The proposed soil sampling methods and laboratory analyses are acceptable.
3. **Technical Reporting.** The proposed technical reporting including implementation of an in-situ respiration test in late fall 2008 is acceptable. Please present the results of the in-situ respiration test in the annual bioventing status report no later than February 1, 2009.
4. **Quarterly Monitoring.** Quarterly groundwater monitoring is to be continued for the site. Please present the results in the quarterly groundwater monitoring reports requested below.

#### **TECHNICAL REPORT REQUEST**

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

- **May 6, 2008** – First Quarter 2008 Groundwater Monitoring Report
- **August 1, 2008** – Biannual Bioventing Status Report
- **August 8, 2008** – Second Quarter 2008 Groundwater Monitoring Report
- **November 7, 2008** – Third Quarter 2008 Groundwater Monitoring Report
- **February 1, 2009** – Annual Bioventing Status Report
- **February 10, 2009** – Fourth Quarter 2008 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

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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.

#### 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

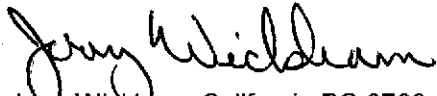
If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety

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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) 567-6791 or contact me my electronic mail at [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org).

Sincerely,



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

Attachment A: Revised Vent Well Locations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Richard Makdisi  
Stellar Environmental Solutions, Inc.  
2198 Sixth Street, Suite 201  
Berkeley, CA 94710

Carl Wilcox  
California Department of Fish and Game  
P.O. Box 47  
Yountville, CA 94500

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

# Attachment A: Revised Vent Well Locations

