



ENVIRONMENTAL HEALTH DEPARTMENT  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
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June 17, 2011

Mr. Paul Garg  
Abe Petroleum  
33090 Mission Blvd  
Hayward, CA 94544

Mr. Som Gupta  
Abe Petroleum LLC  
4231 Golden Oak Ct.  
Danville, CA 94506

Subject: Request for a DPE Pilot Test Work Plan; Fuel Leak Case No. RO00000257 (Global ID #T0600102154), Abe Petroleum, 17715 Mission Boulevard, Hayward, CA 94544

Dear Messrs. Garg and Gupta:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Report for Remedial Investigation / Feasibility Study*, dated September 29, 2009, and the *Quarterly Groundwater Monitoring Report – First Quarter 2011 Report*, dated April 27, 2011. The reports were prepared and submitted on your behalf by Sierra Environmental, Inc. (Sierra). Thank you for submitting the reports; they help to move the site forward.

In the referenced site investigation report Sierra used the membrane interface probe (MIP) technology in association with the installation of soil bores SB1 to SB9. By agreement, an additional bore S1 had been installed previously to delineate the vertical extent of soil contamination and to identify groundwater bearing zones directly beneath the former UST complex. As a result of this investigation, Sierra has identified Dual-Phase Extraction (DPE) as an appropriate remedial technology and has proposed a pilot test 5 days in length. ACEH generally concurs with the proposed scope of work; however, sufficient detail was not provided to approve the scope of work. Consequently, ACEH requests you address the following technical comments and send us a work plan due by the date requested below.

### **TECHNICAL COMMENTS**

- 1. Pilot Test Work Plan** – Sierra has proposed utilizing existing 2-inch diameter well MW-1 as an extraction well, and notes the well is screened between 20 and 35 feet below grade surface (bgs). Sierra also proposes the installation of two 4-inch diameter vapor extraction wells within the former eastern UST excavation. Well SV1 is proposed to be installed to a depth of 18 feet bgs, with screen placed between 8 and 18 feet bgs, while well SV2 is proposed to be installed to a depth of 27 feet, with screening between 20 and 27 feet bgs. Sierra intends on collecting pertinent data including radius-of-influence (ROI), volume of water, volume of soil vapor, and contaminant mass removed.

Because well screen intervals do not overlap in all intervals, ACEH has been unable to determine how the ROI will be determined in the vadose as well as the water-bearing zones, and presumes additional details in a work plan will provide a better understanding of the intend scope of work. ACEH is also unable to determine if three extraction wells, as are proposed, are sufficient to observe these ROIs, and believes a more detailed scope of work would address these details. If additional wells and vapor points are determined necessary, please propose those locations in the requested work plan. Additional details which appear appropriate to include in the addendum (among others) are the intent to collect soil analytical samples, the intended monitoring of induced vacuums, the intended use of a series of extraction steps, and the change in monitoring frequency through the pilot test.

Please submit the Pilot Test Work Plan by the date identified below.

2. **Soil Bore Logging Protocols** – ACEH also believes it appropriate to understand the proposed soil bore logging protocols. The previous use of drilling technologies which collect continuous core samples and that consequently provide significant information about the type and quality of soil throughout a bore, do not appear to have been utilized. As a consequence ACEH requests a copy of the soil bore logging protocols proposed for use by Sierra. Please include these in the Work Plan requested below.
3. **Preferential Pathway Survey** – The *Subsurface Investigation & Site Conceptual Model*, prepared by Sierra and dated July 30, 2006, discloses that utilities in the local vicinity are installed no deeper than 7 feet bgs, and notes that groundwater is encountered significantly deeper. Because utility laterals also create vadose zone migration pathways for contaminants migrating through shallow soil sources, and vapor migration pathways, please depict all vicinity utility lines on future site plans and communicate depth of installation details. This should specifically include onsite utility laterals that connect back to the mains in the street.
4. **Groundwater Monitoring** – Please continue semi-annual groundwater monitoring at the site. Please also incorporate wells MW-4 and MW-5 into the monitoring and sampling program on an initial annual basis. This interval is subject to change based on the analytical results; however, these wells have not been sampled in over four years and it is appropriate to verify no changes have occurred in the interim. Because these wells have not been monitored or sampled over this period of time, it would also be appropriate to redevelop (and repair if necessary) the wells to minimize the potential for atypical analytical results. Additionally in all future monitoring and sampling events, please the measure depth to groundwater in all wells (including these two wells) in order to include them in flow direction and gradient determinations.
5. **Geotracker Well Survey** – Wells MW-4 through MW-7 do not appear to have been surveyed to Geotracker survey standards since they were installed. Please ensure these wells are surveyed at the time any proposed wells are surveyed to these standards. Please upload the resulting GEO\_XY and GEO\_Z data files to Geotracker at an appropriate time.

#### **TECHNICAL REPORT REQUEST**

Please submit the following deliverable to ACEH (Attention: Mark Detterman), according to the following schedule:

- **July 15, 2011** – First 2011 Semi-Annual Groundwater Monitoring Report
- **August 26, 2011** – Pilot Test Work Plan
- **60 Days After Work Plan Approval** – Interim Remediation Results (Pilot Test)
- **January 16, 2012** – Second 2011 Semi-Annual 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.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org).

Sincerely,

Messrs. Garg and Gupta  
RO0000257  
June 17, 2011, Page 3

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

cc: Reza Baradaran, Sierra Environmental, 980 W. Taylor Street, San Jose, CA 95126  
(sent via electronic mail to: [reza@sierraenvironmentalinc.com](mailto:reza@sierraenvironmentalinc.com))  
Mitch Hajiaghai, Sierra Environmental, 980 W. Taylor Street, San Jose, CA 95126  
(sent via electronic mail to: [mitch@sierraenvironmentalinc.com](mailto:mitch@sierraenvironmentalinc.com))

Donna Drogos, ACEH, (sent via electronic mail to [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org))  
Mark Detterman, ACEH, (sent via electronic mail to [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))  
Geotracker, Electronic File

**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/](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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> July 20, 2010
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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](mailto: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](mailto: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.