



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

May 10, 2010

Mr. Balaji Angle
B&C Gas Mini Mart
2008 First Street
Livermore, CA 94005-1215

Mr. John Rutherford
Desert Petroleum
3781 Telegraph Road
Ventura, CA 93003-3420

Subject: Fuel Leak Case No. RO0000278 and Geotracker Global ID T0600100930, Desert Petroleum #795, 2008 First Street, Livermore, CA 94550 – Corrective Action Plan

Dear Mr. Angle and Mr. Rutherford:

I have been assigned to replace Donna Drogos as case worker for your fuel leak case. Please send future correspondence for this case to my attention.

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the document entitled, "*Corrective Action Plan, Valley Gas (Formerly B&C MiniMart) 2008 1st Street, Livermore, California,*" dated January 21, 2009 (CAP). The CAP, which was prepared on your behalf by Golder Associates, summarizes source zone conditions, proposes target cleanup levels, evaluates corrective action alternatives, summarizes the results of an ongoing ozone sparging pilot test, and presents plans for implementation of a corrective action alternative consisting of ozone sparging and soil vapor extraction (SVE).

The proposed corrective actions in the January 21, 2009 CAP are generally acceptable for public comment provided that the technical comments below are addressed prior to or during implementation of the CAP. Revision of the CAP is not required at this time. Public participation is a requirement for the Corrective Action Plan process. Please see technical comment 2 below regarding procedures for notifying interested members of the public of the proposed corrective action. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Site Cleanup Levels.** The proposed site cleanup levels in the January 21, 2009 CAP are generally acceptable. However, we request that a site cleanup level also be established for TBA due to the potential for TBA to form as a by-product of MTBE degradation. We request that a site cleanup level of 12 micrograms per liter, which corresponds to a tier 1 ESL for drinking water, be used for TBA.

2. **Public Notification of CAP.** Public participation is a requirement for the Corrective Action Plan process. Therefore, we request that you prepare a Draft public notice for ACEH review. The Draft public notice should describe the proposed corrective action using a format similar to that in the attached public notice. Upon approval of the public notice, ACEH will provide a mailing list and request that you distribute the public notice to potentially affected members of the public who live or own property in the surrounding area. Public comments on the proposed remediation will be accepted for a 30-day period.
3. **Soil Vapor Extraction Pilot Test.** The CAP proposes conducting a SVE pilot test in order to evaluate SVE as a potential remedial approach for vadose zone soils. Please provide a schedule and brief Work Plan for implementation and monitoring of the SVE pilot test as requested below.

TECHNICAL REPORT REQUEST

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

- **July 13, 2010** – Schedule and Work Plan for SVE Pilot Test
- **July 13, 2010** – Draft Fact Sheet for Public Notification of CAP

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

Attachments: (1) Example of Fact Sheet for Public Notification of CAP (RO0000473)
(2) Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

Responsible Parties
RO0000278
May 10, 2010
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cc: Danielle Stefani, Livermore Pleasanton Fire Department, 3560 Nevada St, Pleasanton, CA 94566
(Sent via E-mail to: dstefani@lpfire.org)

Cheryl Dizon (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551
(Sent via E-mail to: cdizon@zone7water.com)

Chris Davidson, City of Livermore Economic Development, 1052 S. Livermore Ave., Livermore, CA 94550 (Sent via E-mail to: cedavidson@ci.livermore.ca.us)

George Wegmann, Golder Associates, 425 Lakeside Drive, Sunnyvale, CA 94085

Kris Johnson, Golder Associates, 425 Lakeside Drive, Sunnyvale, CA 94085

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

Geotracker, 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.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml).

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)	ISSUE DATE: July 5, 2005
	REVISION DATE: March 27, 2009
	PREVIOUS REVISIONS: December 16, 2005, October 31, 2005
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

- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- 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)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

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 dehloptoxic@acgov.org
 - Or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of My Le Huynh.
 - 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 and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - 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 dehloptoxic@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.



FACT SHEET ON ENVIRONMENTAL ASSESSMENT

FORMER ARCO (INDEPENDENT)

15101 Freedom Avenue, San Leandro, CA 94578
Fuel Leak Case No. RO0000473 and
GeoTracker Global ID T0600191157

Site Remediation Summary

This fact sheet has been prepared to inform community members and other interested stakeholders regarding the status of a proposed soil and groundwater cleanup at the former ARCO located 15101 Freedom Avenue, San Leandro, California. Mr. Pazdel and Mr. Khatirine, the lead responsible parties for the fuel leak case are proposing in-situ multi phase extraction (MPE) and groundwater extraction as remediation technologies to cleanup the site.

Site Background

The site is located at the foot of the San Leandro Hills, along the west side of San Leandro Valley. It is bounded on the north by Freedom Avenue, on the east by Fairmont Avenue, on the south by residential properties and on the west by 151st Avenue. It currently operates as a Texaco gasoline service station with mini-mart, and retails Texaco-branded gasoline and diesel fuel. There are three canopied product dispenser islands and three underground storage tanks (USTs) on-site consisting of one 6,000-gallon diesel UST, one 8,000-gallon gasoline UST, and one 10,000-gallon gasoline UST. Land use immediately surrounding the site is residential, with Interstate 580 located northeast of the site.

Remediation Alternative: Multi-Phase Extraction

Multi-phase extraction (MPE) is proposed to remediate the soil and groundwater at the site. MPE removes vapor phase, dissolved phase, and separate phase contaminants from the soil and groundwater. In MPE, vapor and liquid are removed from each well using a high vacuum, with the liquids stored into a holding tank. The resulting separate phases (liquid and vapor) are treated by passing through granular activated carbon (GAC) (i.e. charcoal), internal combustion engine (ICE), catalytic oxidizer (CatOx) and air stripper, or other method to further remove contamination from liquid and vapor, which is then discharged to ambient air, and/or to the sanitary or storm sewer. MPE systems typically require permanently-installed high-amperage electrical service, as well as natural gas or propane to operate.

For Additional information, please contact:

Paresh Khatri Alameda County Environmental Health 1131 Harbor Bay Parkway, Ste 250 Alameda, CA 94502 Phone: 510-777-2478 E-mail: paresh.khatri@acgov.org	Mansour Sepehr SOMA Environmental Services, Inc. 6620 Owens Drive, Suite A Pleasanton, CA 94588 Phone: 925-734-6400 E-mail: MSepehr@somaenv.com
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Groundwater Extraction and Treatment

Groundwater extraction (GWE) is proposed to remediate the off-site groundwater contaminant plume. GWE would extract contaminated groundwater from a series of extraction wells or French drain. The extracted water is treated using GAC vessels. The treated water is released to the sanitary sewer or storm drain system. This system is effective because it would prevent off-site migration of chemicals while removing most soluble components of groundwater contaminants, such as TBA and MTBE, from groundwater.

Next Step

Mr. Pazdel and Mr. Khatirine are working with Alameda County Environmental Health (ACEH) to implement a soil and groundwater cleanup at the site. The proposed alternative is described in a report prepared by SOMA Environmental Services, Inc. on behalf of Mr. Pazdel and Mr. Khatirine: "Revised Work Plan for Implementing Corrective Action Plan," dated February 10, 2009. The public is invited to review and comment on the cleanup action proposed in the Report. The report is available on ACEH's website (<http://www.acgov.org/aceh/lop/ust.htm>) or the State Water Resources Control Board's GeoTracker website (<http://www.geotracker.waterboards.ca.gov/>). The report and case file are also available for review at the ACEH located at 1131 Harbor Bay Parkway in Alameda, California. Please send a fax to 510-337-9335 to request a date and time to review the case file. Please send written comments regarding the corrective action to Paresh Khatri at the address below. All written comments received by **April 15, 2009** will be forwarded to the Responsible Party and will be considered and responded to prior to a final determination on the proposed cleanup.

