



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

October 27, 2008

John Legallet  
Telegraph Business Properties  
1401 Griffith Street  
San Francisco, CA 94214

Subject: Fuel Leak Case No. RO0000279 and Geotracker Global ID T0600100672, Telegraph Business Properties, 5427 Telegraph Avenue, Oakland, CA 94609

Dear Mr. Legallet:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the site and the most recently submitted documents including the groundwater monitoring report dated December 26, 1996 and the *Risk Screening Analysis* dated March 6, 1997 prepared by Sierra Environmental Services (SES). In the risk analysis, SES describes the indoor air sample analysis that was performed at the site. Concentrations of benzene that exceed the environmental screening levels for commercial and industrial indoor air exist in the two samples that were collected. The groundwater monitoring reports indicate that benzene is present at a concentration of 170 micrograms per liter ( $\mu\text{g}/\text{L}$ ) in the most downgradient well. This value exceeds the ESL for groundwater. The soil borings that were performed also indicate that the extent of the contamination is undefined as boring B-15 had concentrations of 9,100  $\mu\text{g}/\text{l}$  Stoddard solvent and 40  $\mu\text{g}/\text{L}$  benzene. An apartment complex immediately downgradient of B-15 has not been evaluated for potential indoor air exposure to contaminants.

#### **TECHNICAL COMMENTS**

1. **Vertical Delineation of Soil.** Soil samples collected at the site indicate that the vertical extent of the contamination has not been defined in the source area. Soil samples collected below 25 feet below grade from MW-2; contain 200 milligrams per kilogram (mg/Kg) Stoddard solvent. No soil samples were collected below this sample to define the vertical extent of contamination, leaving the extent of contamination undefined in this area. Please submit a proposal to assess the vertical extent of soil contamination in the work plan requested below.
2. **Dissolved Groundwater Plume Characterization.** As stated above, maximum concentrations of 170  $\mu\text{g}/\text{L}$  were detected during the last groundwater monitoring event at this site in downgradient well MW-3. Also, borings that were advanced in 1995 indicate that Stoddard solvent and benzene was detected in groundwater adjacent to the apartment complex on 54<sup>th</sup> Street. ACEH requests that you evaluate the current concentrations of existing wells by redeveloping and sampling them. Please include

analysis for Stoddard solvent, TPHg, by EPA Method 8015M, benzene, toluene, ethylbenzene, toluene, xylenes, methyl tertiary butyl ether (MTBE), ethyl tertiary butyl ether (ETBE), di-isopropyl ether (DIPE), tertiary amyl methyl ether (TAME), tert butyl alcohol (TBA), ethylene dibromide (EDB), ethylene dichloride (EDC) by EPA Method 8260. Please submit the results of the groundwater monitoring event in a report by the date requested below. ACEH also requests that you prepare a work plan to install a groundwater monitoring network to assess current off-site contaminant concentrations in groundwater in the area of and downgradient of B-15 by the date requested below.

- 3. Soil Vapor Sampling.** Indoor air samples were collected in two of the buildings at the site. While the results were below the reporting limit for Stoddard solvent, benzene was detected at a concentration of 2.1 parts per billion by volume (ppbv) which is equivalent to 6.71 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ). The commercial/ industrial land use indoor air ESL for benzene is 0.14  $\mu\text{g}/\text{m}^3$ . Therefore the values for the samples are above the ESL for this constituent. Indoor air values may be influenced by chemical storage (including household cleaning products), activities on the premise (smoking, dry-cleaning), and/or possible external sources of contaminants. Therefore we request that you collect in-situ soil vapor samples to evaluate the vapor pathway in the same areas that identified the elevated readings.

In addition to the on-site vapor sampling, ACEH also requests that you evaluate the vapor migration pathway in the area adjacent to boring B-15 and the nearby apartment building. Please submit your proposal to evaluate the vapor pathway in the work plan by the date requested below.

### **TECHNICAL REPORT REQUEST**

Please submit technical reports to Alameda County Environmental Health (Attention: Barbara Jakub), according to the schedule presented below:

- **January 27, 2009** – Work Plan and 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**

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](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.

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If you have any questions, please call me at (510) 639-1287 or send me an electronic mail message at [barbara.jakub@acgov.org](mailto:barbara.jakub@acgov.org).

Sincerely,



Barbara J. Jakub, P.G.  
Hazardous Materials Specialist

Enclosures: ACEH Electronic Report Upload (ftp) Instructions

cc: Mario Sternad, Serra Environmental Services, P.O. Box 2546, Martinez, CA 94553  
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland,  
CA 94612-2032  
Donna Drogos, ACEH  
Barbara Jakub, ACEH  
File

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>ISSUE DATE:</b> July 5, 2005
	<b>REVISION DATE:</b> December 16, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, 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](mailto:dehloptoxic@acgov.org)  
or
  - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
- 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](mailto: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 at acgov.org. (e.g., [firstname.lastname@acgov.org](mailto: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)