



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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March 25, 2010

Mr. C. Shay Wideman
Ultramar, Inc.
One Valero Way
San Antonio, TX 78249-1616

Castro Group LLC
2021 Francisco Street
Berkeley, CA 94709-2213

Ms. Mary Moore
EMB Group LLC & Mary Moore
Re Trust 611 Marlin Court
Redwood City, CA 94065-1214

Mr. Allen Shin
Banya Investments LLC
3011 Cabrillo Avenue
San Ramon, CA 94583

Mr. Paul Wilson
1238 Stanyan Street
San Francisco, CA 94117

Subject: Fuel Leak Case No. RO0000355 and Geotracker Global ID T0600100155, Beacon #12574, 22315 Redwood Road, Castro Valley, CA 94546 – Site Assessment Results

Dear Mr. Wideman, Castro Group LLC, Ms. Moore, Mr. Shin, and Mr. Wilson:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted document entitled, "*Soil Gas Survey and Soil Assessment Report*," dated January 29, 2010 (Report). The Report, which was prepared on your behalf by Horizon Environmental, Inc., presents results from site assessment activities that included installation and sampling of five soil vapor probes (SG-1 through SG-5) and sampling of five soil borings (B-1 through B-5). The soil vapor sampling results indicate that elevated concentrations of petroleum hydrocarbons are present at four of the five soil vapor sampling locations. The soil boring sampling results indicate that elevated concentrations of petroleum hydrocarbons are present in saturated soil beneath at least the western portion of the former tank pit and are also present in both unsaturated and saturated soils beneath the former eastern dispenser islands. Based on these results, additional site investigation and cleanup is necessary.

The Report includes the following recommendations:

1. Continue to pursue off-site access for soil gas sampling locations SG-6 and SG-7.
2. Install a replacement groundwater monitoring well (MW-5A).
3. Install vapor extraction wells in the area of soil gas sampling location SG-3.
4. Prepare a Site Conceptual Model (SCM) Report and Corrective Action Plan (CAP).
5. Prepare a Risk-Based Corrective Action analysis.

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

TECHNICAL COMMENTS

1. **Off-site Soil Gas Sampling Locations.** We concur with the recommendation to continue to pursue off-site access agreements for soil vapor sampling locations SG-6 and SG-7. These soil vapor sampling locations are needed to evaluate the extent of off-site impacts. If necessary, ACEH is willing to write a request for access to adjacent landowners. To initiate this request from ACEH, please provide the name and address of the adjacent landowner and a chronology of events relevant to obtaining the off-site access agreement such as the dates on which access has been requested and relevant correspondence.
2. **Replacement Well MW-5A.** We concur with the proposed installation of downgradient well MW-5A. Please present plans for well installation in the Work Plan requested below.
3. **Installation of Vapor Extraction Wells.** We concur with the installation of vapor extraction wells in the area of SG-3 and south of MW-2 for the purpose of vapor extraction. Permanent soil vapor monitoring probes will also be required to further evaluate the potential for vapor intrusion to the adjacent commercial building and to evaluate the effectiveness of remediation. Please include plans for the installation of vapor extraction wells and soil vapor monitoring probes in the Work Plan requested below. Please also indicate whether vapor extraction is proposed as an interim remedial action or will be evaluated in the CAP discussed in technical comment 4.
4. **Preparation of SCM/CAP.** The preparation of a SCM/Draft CAP will be necessary for cleanup of the site. We request that you prepare a Draft Corrective Action Plan (Draft CAP) that meets the provisions of section 2725 of the UST regulations (CCR, Title 23, Chapter 16, section 2600, et seq.) and includes the following minimum information:
 - Proposed cleanup goals and the basis for cleanup goals.
 - Summary of site characterization data.
 - Receptor information including likely future land use scenarios, adjacent land use and sensitive receptors, and potential groundwater receptors.
 - Evaluation of remedial alternatives including discussion of feasibility and limitations for each remedial alternative.
 - Detailed description of proposed remediation including confirmation sampling and monitoring during implementation.
 - Post-remediation monitoring.
 - Schedule for implementation of cleanup.

Public participation is a requirement for the Corrective Action Plan process. Therefore, we request that you submit a Draft CAP for ACEH review. Upon ACEH approval of a Draft CAP, ACEH will notify potentially affected members of the public who live or own property in the surrounding area of the proposed remediation described in the Draft CAP. Public comments on the proposed remediation will be accepted for a 30-day period. Please present a schedule for SCM/Draft CAP preparation no later than May 28, 2010.

5. **Detailed Well Survey.** In order to identify potential receptors for the fuel hydrocarbon plume from your site, we request that you locate all water supply wells within a radius of 2,000 feet of the subject site. We recommend that you obtain well information from both Alameda County Public Works Agency and the State of California Department of Water Resources. Submittal of maps showing the location of all wells identified in your study, and the use of tables to report the data collected as part of your survey are required. Please provide a table that includes the well designation, location, total depth, diameter, screen interval, date of well installation, current status, historic use, and owner of the wells. In addition, please provide well logs and completion records for wells downgradient from the site that are potential receptors. Results of the detailed well survey are to be included in the SCM/Draft CAP discussed in technical comment 4.
6. **Groundwater Monitoring.** Please continue the groundwater monitoring program on the current semi-annual basis. Please present the groundwater sampling results in the 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:

- **April 13, 2010** – First Quarter 2010, Semi-Annual Groundwater Monitoring Report
- **May 28, 2010** – Work Plan for Well Installation and Vapor Extraction Wells and Monitoring Probes
- **May 28, 2010** – Schedule for SCM/Draft CAP
- **October 13, 2010** – Third Quarter 2010, 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.

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/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 Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

Responsible Parties
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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

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Gary Barker, Horizon Environmental, Inc., 4970 Windplay Drive, #C5, El Dorado Hills, CA 95762

Kenny Mateik, Horizon Environmental, Inc., 4970 Windplay Drive, #C5, El Dorado Hills, CA 95762

Robert Ehlers, Valero, 685 West Third Street, Hanford, CA 93230

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

Geotracker, File

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.