



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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July 19, 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: Conditional Work Plan Approval for Fuel Leak Case No. RO0000355 and Geotracker Global ID T0600100155, Beacon #12574, 22315 Redwood Road, Castro Valley, CA 94546

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, "*Work Plan for Subsurface Investigation*," dated May 27, 2010 (Work Plan). The Work Plan, which was prepared on your behalf by Horizon Environmental, Inc., proposes the installation of three soil vapor probes, two vapor extraction wells, and one groundwater monitoring well.

The proposed scope of work is conditionally approved and may be implemented provided that the technical comments below are incorporated during the proposed activities. Submittal of a revised Work Plan or Work Plan Addendum 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 comment, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

- 1. Replacement Well MW-5A.** The proposed installation of downgradient well MW-5A is acceptable. Please include sampling of well MW-5A in the semi-annual groundwater monitoring program. Please present results from well installation in the Subsurface Investigation report requested below.
- 2. Installation of Vapor Extraction Wells.** The proposed locations for the vapor extraction wells are acceptable. We request that soils be continuously sampled for logging purposes during the installation of vapor extraction wells in order to provide sufficient information for evaluation of the performance of the wells and to adjust the screen intervals if necessary based on encountered soil conditions during well installation. Please present results from well installation and sampling in the Subsurface Investigation Report requested below.

3. **Sampling of Vapor Probes.** We request that the soil vapor probes be sampled following installation. Please submit a brief Work Plan Addendum describing the sampling and analytical methods for soil vapor samples from the probes.
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.

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.
7. **Off-site Soil Gas Sampling Locations.** We understand that an access agreement has been completed for sampling at proposed off-site soil vapor sampling location SG-7. Please present results from sampling of SG-7 in the Subsurface Investigation Report requested below. Based on communications to date with ACEH, it appears that the land owner for proposed soil vapor sampling

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location SG-6 is continuing to refuse access. You may discontinue attempts to obtain an access agreement for SG-6 at this time. ACHE will respond to the off-site land owner's latest communications.

TECHNICAL REPORT REQUEST

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

- **August 31, 2010** – Work Plan Addendum for Soil Vapor Sampling and Analyses
- **October 13, 2010** – Third Quarter 2010, Semi-Annual Groundwater Monitoring Report
- **November 19, 2010** – Subsurface Investigation Report
- **December 21, 2010** – SCM/Draft 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

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

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: July 8, 2010
	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 Teena Le Khan.
 - 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 Page on upper right side of browser, 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 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.