

## Nowell, Keith, Env. Health

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**From:** Nowell, Keith, Env. Health  
**Sent:** Monday, July 14, 2014 2:39 PM  
**To:** Jasmine Senn (jasmine@aeei.com)  
**Cc:** 'jppaul@skbcos.com'; 'wmast@pesenv.com'; Shane Nolan; 'ryost@platinum-energy.net'; Ed.C.Ralston@p66.com; Dennis Dettloff; Roe, Dilan, Env. Health  
**Subject:** Fuel Leak Case RO356 - BP #11117, 7210 Bancroft, Oakland, CA - Atlas EEI

Dear Ms. Senn:

Alameda County Environmental Health (ACEH) has reviewed the case file including the recently submitted document entitled *Site Management Plan* (SMP), dated June 7, 2013, prepared by Atlas Environmental Engineering, Inc. (Atlas) for the subject site. The SMP includes a discussion of and schedule of events for site demolition plans, and addresses the soil sampling plan, soil and groundwater management plan, and interim removal work plan.

ACEH generally concurs with the proposed scope of work. The proposed scope of work may be implemented provided that the technical comments below are addressed and incorporated during the field implementation. Submittal of a revised SMP is not required unless an alternate scope of work outside that described in the SMP and technical comments below is proposed.

### TECHNICAL COMMENTS:

- Prior to equipment and trucks leaving the site, each vehicle should be inspected for loose soil accumulating on running boards, fenders and other surfaces capable of accumulating deposited soil. Steps should be taken to clear off these surfaces prior to the vehicle leaving the site.
- All piping, whether part of the fuel dispensing systems or dual phase extraction (DPE) system should be removed from the site and disposed of in accordance with Oakland Certified Unified Program Agency (CUPA) directives.
- Excavated soil intended for onsite reuse generated during the removal of underground piping and the underground storage tanks (USTs) should be profiled prior to reuse in accordance with the draft technical reference document prepared by the San Francisco Bay Region, Regional Water Quality Control Board (SFBR-RWQCB) entitled *Characterization and Reuse of Petroleum Hydrocarbon Impacted Soil as Inert Waste*, dated October 29, 2006.
- Import material used as backfill should have documentation demonstrating the material is in compliance with Department of Toxic Substances Control (DTSC) clean fill import guidelines.
- Import material used as backfill should have similar engineering properties as the surrounding native material. Should the excavation depth exceed the depth to water, permeable backfill material, encapsulated in a geotechnical filter fabric, may be placed in the excavation to no more than two feet above the water level in the excavation. The upper portion of the excavation should be backfilled with material having similar engineering properties as the surrounding native material.
- Station demolition report to include documenting fuel system removal and disposal, removal and disposal of DPE system piping, sampling and analysis of excavation, piping, and dispenser samples, stockpile soil profiling and disposal/re-use, and import fill documentation.

### TECHNICAL REPORT REQUEST:

Please upload technical report to the ACEH ftp site (Attention: Keith Nowell), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **August 29, 2014– Site Demolition Report** (file name: RO0000356\_TNK\_R\_yyyy-mm-dd)

## **NOTIFICATION OF FIELDWORK ACTIVITIES**

Please provide ACEH with at least three (3) business days notification prior to conducting the fieldwork.

Thank you for your cooperation. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org).

Sincerely,  
Keith Nowell

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PDF copies of case files can be reviewed/downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>