ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY



ALEX BRISCOE, Agency Director

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

June 13, 2013

Mr. Phillip Jaber George H. Jaber Trust 2801 Encinal Avenue Alameda, CA 94501-4726

Subject: Conditional Approval of Draft Corrective Action Plan; Fuel Leak Case No. RO00000373

Olympic Station (Global ID T0600102256), 1436 Grant Avenue, San Lorenzo, CA 94580

Dear Mr. Jaber:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the Draft Public Comment Fact Sheet, dated March 19, 2013, the *Revised Draft Corrective Action Plan*, dated April 19, 2013, the *Semi-Annual Groundwater Monitoring Report – First Quarter 2013*, dated April 23, 2013, and the *Path to Closure Schedule*, dated May 23, 2013. The reports were prepared on your behalf by Stratus Environmental, Inc. (Stratus). Thank you for submitting the reports.

The Revised Draft Corrective Action Plan proposes the installation of a Dual Phase Extraction (DPE) system, using mobile equipment, in conjunction with Natural Attenuation. Included in the system is the installation of four extraction wells (augmenting three installed for pilot testing), and the installation of four new groundwater monitoring well clusters, to monitor groundwater concentrations in downgradient areas not currently monitored. ACEH is in general agreement with this recommendation.

As requested, the *Path to Closure Schedule* was submitted to provide a project schedule. ACEH is in general agreement with the schedule; however, notes the schedule does not include post-remedial confirmation soil, groundwater, and soil vapor sampling activities.

ACEH conditionally approves the Draft Corrective Action Plan (CAP) for implementation. Conditional approval is contingent on completion of the public participation notification comment period and the submittal, and acceptance of, the CAP Implementation Plan (system design drawings and specifications), as requested below. Based on ACEH staff review of the case and files, we request that you address the following technical comments and send us the reports described below.

TECHNICAL COMMENTS

- 1. CAP Implementation Plan As described in the Revised Draft Corrective Action Plan engineering design drawings and technical specifications for the installation of the DPE and groundwater treatment system will be generated to obtain construction permits and will also be used to prepare a construction bid package. ACEH requests that a final copy be submitted by the date referenced below. Implementation of the CAP is contingent on submittal and ACEH acceptance of these design documents.
- 2. Remedial Progress Reporting Due to the planned corrective action time period, monthly Remedial Progress Reports (RPR) are requested, by the dates identified below. These are intended to monitor site progress and system effectiveness. ACEH requests the first RPR to include as-built diagrams, and a well and system installation report.
- 3. Soil Sampling Up to four soil samples are planned to be collected and submitted for analytical characterization from each installed well. Please evaluate the collection and need for shallow soil

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samples (0 to 5 and 5 to 10 foot intervals), consistent with the Direct Contact and Outdoor Exposure Criteria of the Low-Threat Closure Policy.

- **4. Soil and Groundwater Analytical Suite** In addition to the listed analytes, ACEH requests that all previously detected fuel oxygenates be included in the soil and groundwater analytical suite. This should include tert- butyl either (TBA) and tert amyl methyl ether (TAME).
- 5. Public Participation Notification The proposed scope of work to perform Dual Phased Extraction (DPE; Alternative 1) is acceptable for public comment at this time. Therefore, we request that you distribute the revised Fact Sheet to the mailing list (Attachment 2). Following distribution of the Fact Sheet, please provide your personal certification by e-mail or letter, that the Fact Sheet was distributed by U.S. Mail to the attached mailing list no later than June 28, 2013.
 - At the end of the 30-day public comment period, ACEH will request that you address the public comments received. If no public comments are received, ACEH will approve implementation of the DPE.
- 6. Landowner Notification Pursuant to Section 25297.15 (a), ACEH, the local agency, shall not consider cleanup or site closure proposals from the primary or active responsible party, issue a closure letter, or make a determination that no further action is required with respect to a site upon which there was an unauthorized release of hazardous substances from an underground storage tank subject to this chapter unless all current record owners of fee title to the site of the proposed action have been notified of the proposed action by the primary or active responsible party. ACEH is required to notify the primary or active responsible party of their requirement to certify in writing to the local agency that the notification requirement in the above-mentioned regulation has been satisfied and to provide the local agency with a complete mailing list of all record fee title owners.

To satisfy the above-mentioned requirement, please complete the Attachment 3, "List of Landowners Form," and mail it back to ACEH by the date specified below.

7. Confirmation Sampling Work Plan – ACEH is in general agreement with the referenced CAP report; however, requests a work plan to define areas and outline the scope of work proposed for verification soil, groundwater, and soil vapor sampling at the site by the date identified below.

TECHNICAL REPORT REQUEST

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

- June 28, 2013 Document Fact Sheet Has Been Issued and Provide Landowner Notification Form File to be named: RO373_LND_F_L_yyyy-mm-dd
- July 29, 2013 Public Comment Period Ends
- October 18, 2013 Quarterly Groundwater Monitoring File to be named: RO373_GWM_R_yyyy-mm-dd
- December 16, 2013 First Monthly Remedial Progress Report (Well Installation Report)
 File to be named: RO373_REM_R_yyyy-mm-dd
- **January 17, 2014** Quarterly Groundwater Monitoring and Remedial Progress Report File to be named: RO373_GWM_REM_R_yyyy-mm-dd
- **February 17, 2014** Remedial Progress Report (Including As-Built details) File to be named RO373 REM R yyyy-mm-dd
- 30 Days After Completion of Corrective Actions Confirmation Work Plan (Verification Sampling)
 File to be named: RO373 WP L yyyy-mm-dd

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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.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark E. Detterman, PG, CEG Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations and

Electronic Report Upload (ftp) Instructions

Attachment 2 - Public Notification Fact Sheet on Environmental Assessment

Attachment 3 – List of Landowners Form

cc: Stephen Carter, Stratus Environmental, Inc, 3330 Cameron Park Drive, Suite 550, Cameron Park, CA 95682 (sent via electronic mail to: scarter@stratusinc.net)

Gowri Kowtha, Stratus Environmental, Inc, 3330 Cameron Park Drive, Suite 550, Cameron Park, CA 95682 (sent via electronic mail to: gkowtha@stratusinc.net)

Donna Drogos, (sent via electronic mail to donna.drogos@acgov.org)

Dilan Roe (sent via electronic mail to dilan.roe@acgov.org)

Mark Detterman (sent via electronic mail to mark.detterman@acgov.org)

Electronic File, GeoTracker

ATTACHMENT 1

Responsible Party(ies) Legal Requirements/Obligations
& ACEH Electronic Report Upload (ftp) Instructions

Attachment 1

Responsible Party(ies) Legal Requirements/Obligations

REPORT/DATA REQUESTS

These reports/data are being requested pursuant to Division 7 of the California Water Code (Water Quality), Chapter 6.7 of Division 20 of the California Health and Safety Code (Underground Storage of Hazardous Substances), and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations (Underground Storage Tank Regulations).

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (Local Oversight Program [LOP] for unauthorized releases from petroleum Underground Storage Tanks [USTs], and Site Cleanup Program [SCP] for unauthorized releases of non-petroleum hazardous substances) require submission of reports in electronic format pursuant to Chapter 3 of Division 7, Sections 13195 and 13197.5 of the California Water Code, and Chapter 30, Articles 1 and 2, Sections 3890 to 3895 of Division 3 of Title 23 of the California Code of Regulations (23 CCR). Instructions for submission of electronic documents to the ACEH FTP site are provided on the attached "Electronic Report Upload Instructions."

Submission of reports to the ACEH FTP site is in addition to requirements for electronic submittal of information (ESI) to the State Water Resources Control Board's (SWRCB) Geotracker website. In April 2001, the SWRCB adopted 23 CCR, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1 (Electronic Submission of Laboratory Data for UST Reports). Article 12 required electronic submittal of analytical laboratory data submitted in a report to a regulatory agency (effective September 1, 2001), and surveyed locations (latitude, longitude and elevation) of groundwater monitoring wells (effective January 1, 2002) in Electronic Deliverable Format (EDF) to Geotracker. Article 12 was subsequently repealed in 2004 and replaced with Article 30 (Electronic Submittal of Information) which expanded the ESI requirements to include electronic submittal of any report or data required by a regulatory agency from a cleanup site. The expanded ESI submittal requirements for petroleum UST sites subject to the requirements of 23 CCR, Division, 3, Chapter 16, Article 11, became effective December 16, 2004. All other electronic submittals required pursuant to Chapter 30 became effective January 1, 2005. Please visit the SWRCB website for more information on these requirements. (https://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

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, 7835, 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, late 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 SCP)

REVISION DATE: July 25, 2012

ISSUE DATE: July 5, 2005

PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010

SECTION: Miscellaneous Administrative Topics & Procedures

SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (petroleum UST and SCP) 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

- Please do not submit reports as attachments to electronic mail.
- Entire report including cover letter must be submitted to the ftp site as a single Portable Document Format (PDF) with no password protection.
- 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.
- <u>Do not</u> 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.
 <u>Documents with password protection will not</u> 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)

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 .loptoxic@acgov.org
 - 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 ://alcoftp1.acgov.org
 - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, 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 .loptoxic@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.

ATTACHMENT 2 PUBLIC NOTIFICATION FACT SHEET ON ENVIRONMENTAL ASSESSMENT

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY



ALEX BRISCOE, Agency Director

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

June 13, 2013

Fact Sheet on Environmental Assessment Former Olympic Oil Station

1436 Grant Avenue, San Lorenzo, CA 94580-1443 Fuel Leak Case No. RO000373 GeoTracker Global ID T0600102256

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 Olympic Service Station located at 1436 Grant Avenue, San Lorenzo, California. Mr. Phil Jaber and the George and Frida Jaber 1989 Family Trust, the Responsible Party for the fuel leak case, is proposing dual-phase extraction (DPE) and natural attenuation as remedial technologies to clean up the site.

Site Background

The site is located on the southern corner of Grant Avenue and Channel Street in San Lorenzo. It is bounded to the northwest by Grant Avenue, to the northeast by Channel Street, and to the southwest and southeast by the Arroyo Center strip mall. San Lorenzo Auto Repair currently operates at the site. All gasoline dispensing facilities, including the underground storage tanks, dispensers, associated product piping were removed in 1998. Properties in the immediate vicinity are developed as single family residences, space. apartments. A parking lot and athletic field for Arroyo High School are situated on property north of Grant Avenue.

<u>Proposed Remediation Activities:</u> Dual-Phase Extraction and Natural Attenuation

DPE is proposed to remediate the soil and groundwater beneath the site. DPE removes vapor phase and dissolved phase contaminants from the soil and groundwater. In DPE, vapor and liquid are removed from wells using high vacuum applied to a well, with extracted liquids stored in a holding tank. The wells are anticipated to have an approximately

25 foot radius. The wells are installed with overlapping extraction zones of influence. The extracted vapors are treated with a catalytic oxidizer, and then discharged to the atmosphere. The extracted groundwater is passed through granular activated carbon, and then discharged to the sanitary sewer. Both discharge operations are subject to permitting by regulatory agencies to ensure post-extraction discharge limits are not exceeded after treatment.

Dissolved fuel contaminants off-site under Grant Avenue and the adjacent Arroyo Center will be remediated by natural processes, including naturally occurring microbes. This process is expected to become more efficient over time because additional contaminants are not expected to migrate off-site because of source remediation with DPE at the former Olympic Service Station.

Next Step

Mr. Jaber is working with Alameda County Environmental Health (ACEH) to implement soil and groundwater cleanup at this site. The proposed alternative is described in a report prepared by Stratus Environmental, Inc. on behalf of Mr. Jaber: "Revised Corrective Action Plan," dated April 1, 2013. The public is invited to review and comment on the cleanup action proposed in this report. The Revised Corrective Action Plan is available on ACEH's website (http://www.acgov.ort/aceh/lop/ust.htm) or the State Water Resources Control board's GeoTracker website (http://getotracker.waterboards.ca.gov). The report is also available for review at 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 proposed corrective action to Mark Detterman at the address below. All written comments received by July 29, 2013, will be forwarded to the Responsible Party, and will be considered and responded to prior to a final determination on the proposed cleanup.

For additional information, please contact:

Mark Detterman Alameda County Environmental Health 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502

Phone: 510-567-6876

E-mail: mark.detterman@acgov.org

Steve Carter Stratus Environmental, Inc. 3330 Cameron Park Drive, Suite 550 Cameron Park, CA 95682

Phone: 530-676-6008 E-mail: scarter@stratusinc.net



Aerial View of Property (Google Earth, 2013)

ALLEN MICHAEL T & KIKUNO Parcel #: 411-12-24 1416 VIA BARRETT SAN LORENZO CA 94580 BALTAZAR DAVID &
Parcel #: 411-33-83
1391 JACQUELINE PL
SAN LORENZO CA 94580

BROUILLETTE PATRICIA A Parcel #: 411-33-123 1400 JACQUELINE PL SAN LORENZO CA 94580

BURKFIELD KEVIN Parcel #: 411-33-119 1384 JACQUELINE PL SAN LORENZO CA 94580 CASTANEDA ALFONSO & Parcel #: 411-33-82 1395 JACQUELINE PL SAN LORENZO CA 94580 CONLEY KEVIN E & CONNIE J Parcel #: 411-33-121 1392 JACQUELINE PL SAN LORENZO CA 94580

DANG ALICE Parcel #: 411-33-126 1406 JACQUELINE PL SAN LORENZO CA 94580

DANG HONG Parcel #: 411-33-127 1375 JACQUELINE PL SAN LORENZO CA 94580 DENG YUE H TR Parcel #: 411-33-124 1414 JACQUELINE PL SAN LORENZO CA 94580

DEVETTER SHARON
Parcel #: 411-33-125
1410 JACQUELINE PL
SAN LORENZO CA 94580

FONG JOANNE TR Parcel #: 411-39-8 1458 33RD AVE SAN FRANCISCO CA 94122 GANEM DARIN L & Parcel #: 411-39-127 15801 VIA SECO SAN LORENZO CA 94580

HALILI DANIEL & CLAUDIA Parcel #: 411-33-80 1407 JACQUELINE PL SAN LORENZO CA 94580 HATCHER JAMES S TR Parcel #: 411-33-120 25 RIDGELINE DR NEWPORT BEACH CA 92660 HERRING KENNETH J & Parcel #: 411-39-7 15808 VIA SECO SAN LORENZO CA 94580

JABER P J & M G & ADRANLY Parcel #: 411-39-2 2801 ENCINAL AVE ALAMEDA CA 94501 JABER P J & M G & ADRANLY Parcel #: 411-39-1 2801 ENCINAL AVE ALAMEDA CA 94501 LEUNG YEE & YAN STEPHEN Parcel #: 411-12-27 217-02 48TH AVE BAYSIDE NY 11364

LIANG WAN L & WONG Parcel #: 411-9-113 1456 VIA BARRETT SAN LORENZO CA 94580 LUO WEI H & LIANG JIE L Parcel #: 411-33-81 1403 JACQUELINE PL SAN LORENZO CA 94580 MEDINA LUCIANO & ANA A Parcel #: 411-39-128 15560 LORENZO AVE SAN LORENZO CA 94580

MORA SALVADOR & HELEN L Parcel #: 411-9-112 1464 VIA BARRETT SAN LORENZO CA 94580 RAMIREZ VICENTE & Parcel #: 411-39-6 15816 VIA SECO SAN LORENZO CA 94580 RESIDENT Parcel #: 411-12-27 1440 VIA BARRETT SAN LORENZO CA 94580

RESIDENT Parcel #: 411-27-1 NIELSON AVE SAN LORENZO CA 94580 RESIDENT Parcel #: 411-33-120 1388 JACQUELINE PL SAN LORENZO CA 94580 RESIDENT Parcel #: 411-33-122 1396 JACQUELINE PL SAN LORENZO CA 94580

RESIDENT Parcel #: 411-33-127 1402 JACQUELINE PL SAN LORENZO CA 94580 RESIDENT Parcel #: 411-39-2 15821 CHANNEL ST SAN LORENZO CA 94580 RESIDENT Parcel #: 411-39-1 1436 GRANT AVE SAN LORENZO CA 94580 RESIDENT Parcel #: 411-39-8 15800 VIA SECO SAN LORENZO CA 94580

SAN LORENZO UNIFIED Parcel #: 411-27-1 15510 USHER ST SAN LORENZO CA 94580

SISNEROS PHILLIP & MARY Parcel #: 411-33-79 1411 JACQUELINE PL SAN LORENZO CA 94580 RESIDENT Parcel #: 411-39-128 1503 VIA RANCHO SAN LORENZO CA 94580

SEGURA JULIA Parcel #: 411-12-25 1424 VIA BARRETT SAN LORENZO CA 94580

SPENCE JAMES D TR Parcel #: 411-12-26 1432 VIA BARRETT SAN LORENZO CA 94580 ROBINSON FARMAN J JR & Parcel #: 411-12-23 1408 VIA BARRETT SAN LORENZO CA 94580

SHOLD VIRGIL E & LAVERNA Parcel #: 411-33-122 1625 VIA BARRETT SAN LORENZO CA 94580

ATTACHMENT 3 LIST OF LANDOWNERS FORM

LIST OF LANDOWNERS FORM

County of Alameda Environmental Health Services Environmental Protection 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577

CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR:

Site Name: Olympic Station	
Address: 1436 Grant Avenue	
City, State, Zip: San Leandro, CA 94580	
Record ID #: RO0000373	
Please fill out item 1 if there are multiple site landowners (attach an extra sheet if necessary) andowner, skip item 1 and fill out item 2.	
I. In accordance with Section 25297.15(a) of Chapter 6.7 of the California Heal (name of primary responsible party), certify that the list of current record fee title owners and their mailing addresses for the above site:	
Name:	
Address:	
City, State, Zip:	
E-mail Address:	
Name:	
Address:	
City, State, Zip:	
E-mail Address:	
Name:	
Address:	
Name:	
Address:	
2. In accordance with Section 25297.15(a) of Chapter 6.7 of the California Hea, certify that I am the sole landowner for th	-
Sincerely,	
Signature of Primary Responsible Party Printed Name Date E-mail A	Address