



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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October 24, 2008

Faye Beverett  
2855 Mandela LLC  
1624 Franklin Street, Suite 310  
Oakland, CA 94612-2822

International Truck & Engine  
David Piech  
4201 Winfield Road  
Warrenville, IL 60555

Subject: Fuel Leak Case No. RO0000378 and Geotracker Global ID T0600101522, Wareham Property Development, 2855 Mandela Parkway, Oakland, CA 94607

Dear Ms. Beverett & Mr. Piech:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Soil Vapor Sampling Work plan," dated October 1, 2008, which was prepared by Treadwell & Rollo for the subject site. Soil vapor sampling from existing permanent soil vapor wells is proposed and briefly described in the work plan. However, adequate detail was not presented to approve the scope of work as presented in the work plan. In an effort to expedite the health risk evaluation at the site and since ACEH generally concurs with the concept of the proposed scope of work, the proposed scope of work may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. Submittal of a revised Work Plan 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 comments, submit the requested additional calculations, perform the proposed work, and send us the technical reports requested below.

**TECHNICAL COMMENTS**

1. **Soil Vapor Sampling Protocol** – As mentioned above, little detail was presented regarding the soil vapor sampling methodology. Therefore, the following protocol, in addition to the applicable portions of DTSC guidance documents cited in the work plan, must be adhered to in order to ensure that representative soil vapor samples are collected.
  - a. **Equipment Vacuum test** – An equipment vacuum test will reduce the connections requiring a tracer gas atmosphere during sampling. To minimize the potential for ambient air (and tracer gas) intrusion from connections in the sampling train during sample collection, please perform a vacuum test on the connections between the summa canisters and valve on the downhole side of the flow regulator. This may be conducted by opening and closing the purge canister valve to place a test vacuum on the assembly. The vacuum on the sampling train must be maintained for at least 10 minutes. This should ensure that the sampling train is "tight" with no obvious leaks.

- b. Tracer Gas Atmosphere – Treadwell & Rollo proposes to use a tracer compound (e.g. shaving foam) placed at connections “between the sample tubing and sampling point and the sampling tubing and Summa Canister.” ACEH is concerned that not all fittings may be in contact with the tracer compound thereby allowing a potential leak to occur compromising the sampling results. It is recommended that the soil vapor well, sampling device, and all fittings are placed under a shroud with pliable weather-stripping along its base with a tracer (e.g. isopropyl alcohol) placed inside the shroud, which results in a tracer gas atmosphere. The shroud should ensure that there is tracer gas around all sampling connections. The shroud should have a port for inserting a monitoring and sampling device (e.g. Photo Ionization Detector) to ensure that tracer gas atmosphere is maintained.
- c. Vapor Flow Rate – High vapor purge and sampling rates may increase the possibility of short-circuiting or driving hydrocarbon-affected soil into the vapor phase, whereas low flow rates may not adequately capture the vapor and potentially affect the percent of sample due to leakage. Therefore, an appropriate vapor flow rate of 150 to 200 milliliters per minute is recommended.
- d. Purge Volume – Treadwell & Rollo states that the “[s]oil vapor wells will be purged of three casing volumes equivalent to 7,500 milliliter (ml), using a purge pump.” Treadwell & Rollo also states that the vapor probes are 12 inches in length. Based on the recommended flow rate stated above, the calculated three purge volumes of 7,500 milliliters will require approximately 37 minutes (at 200 milliliters per minute), which appears rather excessive. Assuming a typical ¼-inch diameter tubing diameter, the calculated amount of three purge volumes required is approximately 30 milliliters. Prior to conducting fieldwork, please submit purge volume calculations for review, that includes vapor well construction details, diameter and length of vapor probes, etc. Please submit the purge volume calculations due by the date specified below.

#### **NOTIFICATION OF FIELDWORK ACTIVITIES**

Please schedule and complete the fieldwork activities by the date specified below and provide ACEH with at least three (3) business days notification prior to conducting the fieldwork.

#### **TECHNICAL REPORT REQUEST**

Please submit technical reports to ACEH (Attention: Paresh Khatri), according to the following schedule:

- **November 7, 2008** – Purge Volume Calculations
- **December 19, 2008** – Soil and Water Investigation Report (Soil Vapor Investigation 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

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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.

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**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.

If you have any questions, please call me at (510) 777-2478 or send me an electronic mail message at [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org).

Sincerely,



Paresh C. Khatri  
Hazardous Materials Specialist



Donna L. Drogos, PE  
Supervising Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Janet Jolley, Balco Properties, 1624 Franklin Street, Suite 310, Oakland, CA 94612  
Grover Buhr, Treadwell & Rollo, 501 14<sup>th</sup> Street, 3<sup>rd</sup> Floor, Oakland, CA 94612  
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032  
Donna Drogos, ACEH (sent via electronic mail)  
Paresh Khatri, ACEH (sent via electronic mail)  
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)