



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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May 23, 2014

Mr. Farrokh Hosseinvoun  
(Sent via E-mail to: [farok@fhone.net](mailto:farok@fhone.net))

Mr. Mohammad Pazdel  
1770 Pistacia Court  
Fairfield, CA 94533

Mr. Hamid Khatirine  
c/o Mr. Michael D. Liberty  
3713 Century Drive  
Campbell, CA 95008-3832

Subject: Request for Work Plan; Fuel Leak Case No. RO0000473 and GeoTracker Global ID T0600191157, ARCO, 15101 Freedom Avenue, San Leandro, CA 94578

Dear Messrs. Hosseinvoun, Pazdel, and Khatirine:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Additional Off-Site Investigation Report and Updated Site Conceptual Model*, dated March 7, 2014. The report was prepared on your behalf by SOMA Environmental Engineering, Inc. Thank you for submitting the report.

The referenced report documented the installation of cone penetrometer test (CPT) bores CPT-10 to CPT-19, associated membrane interface probe (MIP) bores, direct push bore DP-6, and step out direct push bore DP-6-SO at and downgradient of the referenced site. The report also documented the collection of a crawl-space vapor sample beneath the residential home immediately across the downgradient property boundary, the collection of a sample of the light non-aqueous-phase liquid (LNAPL) for fingerprinting analysis, and the attempted resampling of a residential water supply well, at an approximate distance of 890 feet downgradient of the release at the site, that has previously been documented to be contaminated with a fuel oxygenate compound. The report recommended the generation of a work plan to support the installation of two groundwater monitoring wells downgradient of the site.

Based on the review of the case file ACEH requests that you address the following technical comments and send us the documents requested below.

#### **TECHNICAL COMMENTS**

1. **Work Plan Request** – As required by the Low-Threat Closure Policy (LTCP), ACEH is in general agreement with the recommendation for additional work to delineate the extent of the LNAPL and groundwater plume downgradient of the site; however, requests several modifications to the preliminary proposal. These include the following:
  - a. **Groundwater Monitoring Well Placement** - ACEH is in general agreement with the recommendation for additional groundwater wells downgradient of the referenced site; however, differs in proposed locations for the wells. A significant mass of hydrocarbons, including LNAPL, appears to be present and retained in the vicinity of downgradient well MW-6 and EX-2 (approximately 100 feet downgradient of the property line) by groundwater extraction at offsite extraction wells EX-1 and EX-2. ACEH is concerned that the downgradient extent of the LNAPL and groundwater plumes may have migrated past the proposed, widely spaced, locations of MW-10 and MW-11 prior to initiation of extraction at wells EX-1 and EX-2. In addition to the installation the proposed wells, the installation of a

well at the northern end of the center median in Fairmount Drive southwest of the proposed location of well MW-10 appears to position a well along a potential flow pathway that is not otherwise monitored downgradient of the site. Additionally, due to the distance between sampling points (MW-7, MIP-12, MIP-16, and TWB-3) and the irregular distribution of contaminants in groundwater at these points, it also appears that another short well transect along the eastern side of Fairmount Drive increases the probability of determining the downgradient extent of the plume(s) downgradient of the existing monitoring and extraction well network. Please incorporate these details into the requested work plan, and submit a work plan by the date specified below. The positioning of the requested and proposed wells can be further discussed.

- b. Multi-Phase Extraction Events and Cost-Benefit Analysis** – Potentially as a temporary measure, but due to the successful removal of an estimated hydrocarbon mass of approximately 35 pounds per day, during Multi-Phase Extraction (MPE) events in October and November 2013 from wells MPE-1, MPE-2, and offsite well MW-6, it appears appropriate to request the inclusion of additional relatively short-term MPE events at the subject site in the work plan. However, because these events appear to remove sufficient LNAPL, please also include a cost-benefit analysis of installing a fixed-base system at the site, rather than continuation of short-term mobile MPE events in the work plan. Please incorporate this into the requested work plan, and submit a work plan by the date specified below.
  - c. Vapor Sampling** – As noted, a crawl space vapor sample was collected as a part of the work included in the recent report submittal. While vapor concentrations are relatively low and encouraging, the concentrations are not below appropriate standards as indicated in the report. Appendix B of the Department of Toxic Substances Control (DTSC) *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air*, dated October 2011, indicates that no attenuation factor is to be applied between crawl space and indoor air. DTSC states this is consistent with US EPA guidance. Therefore, it is appropriate to compare indoor air Environmental Screening Levels (ESLs) published by the San Francisco Regional Water Quality Control Board (RWQCB), rather than ESLs for soil gas, which are understood to be collected at a depth of 5 feet below grade surface (bgs), and have an attenuation factor incorporated into the resulting higher acceptable concentrations. Using indoor air ESLs, benzene, ethylbenzene, and naphthalene exceed the indoor air vapor ESLs. Consequently, it appears appropriate to request additional vapor sampling beneath the house, but this is requested to include a background outdoor air vapor sample at a location to be discussed, in order to determine the general air quality of the heavily trafficked vicinity. It also appears warranted to request a general description of the crawl space construction (completely enclosed with vents every so many feet, vs. completely vented without any enclosing constructions). Please incorporate this into the requested work plan, and submit a work plan by the date specified below.
- 2. Groundwater Monitoring** – Please continue with quarterly groundwater monitoring at the subject site due to fluctuating groundwater contaminant concentrations and the presence of LNAPL in several wells at and, at least 100 feet, downgradient of the site. Please submit reports by the dates 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:

- **August 15, 2014** – Work Plan and Cost-Benefit Analysis  
File to be named: RO473\_WP\_R\_yyyy-mm-dd
- **July 25, 2014** – Second Quarter 2014 Groundwater Monitoring Report  
File to be named RO473\_GWM\_R\_yyyy-mm-dd

- **60 Days After Work Plan Approval** – Site Investigation  
File to be named: RO473\_SWI\_R\_YYYY-MM-DD
- **October 31, 2014** – Third Quarter 2014 Groundwater Monitoring Report  
File to be named RO473\_GWM\_R\_YYYY-MM-DD
- **January 31, 2015** – Fourth Quarter 2014 Groundwater Monitoring Report  
File to be named RO473\_GWM\_R\_YYYY-MM-DD

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](mailto: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

cc: Mansour Sepehr, SOMA Environmental Engineering, 6620 Owens Dr., Ste A, Pleasanton, CA 94588 (Sent via E-mail to: [msepehr@somaenv.com](mailto:msepehr@somaenv.com))

Dilan Roe, ACEH (Sent via E-mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))  
Electronic File; GeoTracker

## 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.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://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, 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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> May 15, 2014
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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

- **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.**
- **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)

## 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 [deh.loptoxic@acgov.org](mailto:deh.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 <ftp://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 [deh.loptoxic@acgov.org](mailto:deh.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.