



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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September 25, 2008

Ms. Stacie Freichs
Chevron Environmental Mgmt
6001 Bollinger Canyon Rd K2256
PO Box 6012
San Ramon, CA 94583-2324

Mr. Jack Edwards
2920 Castro Valley Blvd.
Castro Valley, CA 94546

K&K Petroleum LLC
6071 Laurel Creek Road
Pleasanton, CA 94588-4654

Mr. Surinder Goswamy
2920 Castro Valley Blvd.
Castro Valley, CA 94546

Subject: Fuel Leak Case No. RO0000475 (Global ID # T0600100324), Chevron #9-6991, 2920 Castro Valley Blvd.,
Castro Valley, CA

Dear Ms. Stacie Freichs, Mr. Jack Edwards, K&K Petroleum LLC:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site and the document entitled "Site Conceptual Model and Investigation Work Plan" received January 15, 2008 and prepared by Conestoga Rovers Associates (CRA). The work plan recommends the installation of two soil borings and the decommissioning and replacement of one offsite well (MW-6). During our review of the work plan, ACEH noticed inconsistencies between figure 2, figure 5, figure 6, figure 7 and figure 8; these figures show different soil boring and replacement well locations and a conflicting number of soil borings. Therefore, ACEH does not concur with the recommendations as submitted in the work plan.

Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to <mailto:steven.plunkett@acgov.org>) prior to the start of field activities.

TECHNICAL COMMENT

1. **Soil Boring and Replacement Well Locations.** During our review of the work plan, ACEH identified discrepancies between figure 2, figure 5, figure 6, figure 7 and figure 8; figures 2, 5, 6 and 8 shows the location of two soil borings, while figure 7 shows the location of four soil borings. We agree with the installation of soil borings as shown in figure 7 located adjacent to Castro Valley Boulevard. However, the linear separation between the soil borings must be 30 feet or less. Therefore, we recommend you install a transect of soil borings to assess the dissolved hydrocarbon plume south west of your site.

Also, on page 7 of the work plan CRA recommends that the soil borings should be advanced to a depth of 25 feet bgs and the soil borings will be completed as 2-inch monitoring wells. It is unclear from this statement if all the soil borings are to be converted to monitoring wells. Furthermore, figure 2, 5, 6 and 8 show the location of the replacement well approximately 100 feet southwest of well MW-6, while figure 7 shows the location of the replacement well approximately 10 feet south of MW-6. We agree with the location of replacement well in figure

7, approximately 10 feet south of the existing monitoring well. Also, figure 7 shows an additional monitoring well adjacent to well MW-5. Please explain the purpose of this duplicate well. Please update the following; the text in the work plan, table 3 to show the depth of water sample and figure 2, figure 5, figure 6, figure 7 and figure 8 to show the correct location for the transect of soil borings, the replacement well in the work plan addendum requested below.

2. **Monitoring Well Installation.** Currently, all onsite and offsite monitoring wells are constructed with long screen intervals of 15 feet. CRA recommends that the replacement well for MW-6 should be installed with a 15 foot screen interval. ACEH does not agree with the use of monitoring wells designed with long screen intervals. ACEH request the use of short screen monitoring wells designed with filter pack of 5 feet or less, as these wells will yield data representative of groundwater conditions at a specific depth interval.

In addition, we request that you install a monitoring well near soil boring SB-5 to evaluate free product that was detected (but not sampled) in source area soil boring SB-5. Please present your design for the monitoring wells in the work plan addendum requested below.

3. **Soil Sampling and Analysis.** During the offsite soil boring installation, soil samples should be screened with a PID and examined for visible staining and hydrocarbon odor. Any interval where staining, odor, or elevated PID readings occur a soil sample is to be collected and submitted for laboratory analysis. Soil samples collected during the offsite phase of the investigation are to be analyzed for TPHg and TPHd by EPA Method 8015M or 8260, BTEX, MtBE and TBA and by EPA Method 8260

Soil samples collected during the installation of the free product monitoring well shall be collected at 5 feet intervals, changes in lithology, any interval where odor, staining or elevated PID reading occur. All soil samples collected during the investigation are to be analyzed for TPHg and TPHd by EPA Method 8015M or 8260, BTEX, MtBE, DIPE, TBA, TAME, ETBE, ETOH, EDB and EDE by EPA Method 8260. Please present the results from the soil sampling in the SWI report requested below.

4. **Groundwater Sampling and Analysis.** We agree with groundwater analysis as recommended by CRA. However, we request that you add EDB and EDC analysis to the free product (source area) monitoring well.
5. **Preferential Pathway Survey.** CRA concludes that subsurface utilities may be acting as a migration pathway for the transport of dissolved hydrocarbon plume. However, no discussion has been presented to evaluate the potential migration of the dissolved phase plume along the utility corridor on the north side of Castro Valley Boulevard. Please discuss your plan to determine if the utility corridor may be acting as potential migration pathway in the report requested below.
6. **Insufficient Water.** During our review of groundwater analytical data, we observed several occurrences where no sampling was conducted due to insufficient water in the monitoring well. Please present a plausible explanation what would cause insufficient water. Please present your assessment in the work plan addendum requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Steven Plunkett), according to the following schedule:

- **October 30, 2008** – Work Plan Addendum
- **February 28, 2009** – Soil and Groundwater 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 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

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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) 383-1761 or send me an electronic mail message at steven.plunkett@acgov.org.

Sincerely,



Steven Plunkett
Hazardous Materials Specialist



Donna Drogos, PE
Supervising Hazardous Materials Specialist

cc: Brain Carey
CRA
2000 Opportunity Drive, Suite 110
Roseville, CA 95678

Donna Drogos, Steven Plunkett, ACEH, File