



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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August 13, 2009

Paul Supple (*Sent via E-mail to: [paul.supple@bp.com](mailto:paul.supple@bp.com)*)  
Atlantic Richfield Company  
(A BP Affiliated Company)  
P.O. Box 1257  
San Ramon, CA 94583

Terry Grayson (*Sent via E-mail to: [Terry.L.Grayson@contractor.conocophillips.com](mailto:Terry.L.Grayson@contractor.conocophillips.com)*)  
ConocoPhillips  
76 Broadway  
Sacramento, CA 95818

Ping Liu Chien  
Harbor Bay Landing, LLC.  
P.O. Box 117610  
Burlingame, CA 94011

Subject: Work Plan Addendum for Fuel Leak Case No. RO0000511 and GeoTracker Global ID  
T0600101198, BP #11270, 3255 Mecartney Road, Alameda, CA 94501

Dear Messrs. Supple, Grayson, and Chien:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Work Plan – Soil Vapor Survey," dated June 8, 2009, which was prepared by Delta Consultants. Delta has proposed to collect two soil vapor samples at the site in response to our May 8, 2009 correspondence. ACEH is concerned that the proposed soil vapor locations may not address concerns identified in our May 8, 2009 correspondence and the proposed methodology may not allow soil vapor sample collection that is representative of actual vadose zone soil conditions.

ACEH requests that you address the following technical comments and send us the work plan addendum requested below.

#### **TECHNICAL COMMENTS**

1. **Sampling Density** – As stated in our May 8, 2009 correspondence, concentrations of TPH-g and benzene at the site were detected as high as 2,000 mg/kg and 18 mg/kg, respectively, located in the vicinity of the former fuel USTs. Delta proposes to install two soil vapor sampling points near the service station building, approximately 45 feet southeast of the elevated residual hydrocarbons detected in soil. Although the proposed sampling locations appear to evaluate potential contaminant volatilization to indoor in the vicinity of the service station building, the proposed locations do not appear to evaluate the "hot spot" at the site. Also, it is important to note that case closure for the site is based on not only the current land use scenario, but future land use as well. Therefore, it is conceivable that a commercial

structure could be constructed over areas of elevated residual hydrocarbons at the site, which were not adequately characterized. To adequately characterize the site, additional sampling locations in the areas of likely impact are necessary. Please propose a scope of work to address the above-mentioned concerns and submit a work plan addendum due by the date specified below.

2. **Soil Vapor Sampling Point Methodology** – Delta states that “[s]oil vapor sampling points will be hand augered to five (5) feet bgs for utility clearance. The borehole will be backfilled as follows: sand from 3.5 to five (5) feet bgs, hydrated bentonite granules from 3.5 to 2.5 feet bgs, thick bentonite mixture from just below existing asphalt to 2.5 feet bgs, and thin layer of cold patch asphalt to grade.” Following the two week stabilization period, Delta states that “[a] boring will be advanced, using direct push technology, to place a soil vapor sampling tip into the previously installed sand zone (approximately 3.5 to five feet bgs).” ACEH is concerned that installing a sampling tip using direct push technology may push hydrated bentonite into the sand effectively sealing off accumulated soil vapor, which we are attempting to sample. It may be advantageous to install appropriate tubing into the bore hole during construction and subsequently collect a soil vapor sample through the pre-installed tubing. Please propose a scope of work to address the above-mentioned concerns and submit a work plan addendum due by the date specified below.
3. **Tracer Compound** – Delta states that a tracer compound will be analyzed to evaluate potential ambient air intrusion for leak check purposes. However, Delta does not identify the tracer compound. Delta does not identify how the tracer will be applied or whether the tracer is a gas or liquid compound. It is recommended that soil vapor wells or probes are constructed with the sampling device and all fittings placed under a shroud with pliable weather-stripping along its base to maintain a tracer gas atmosphere. The shroud should ensure that there is sufficient 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. Please propose a scope of work to address the above-mentioned concerns and submit a work plan addendum due by the date specified below.

### **TECHNICAL REPORT REQUEST**

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

- **September 14, 2009** – Soil and Water Investigation Work Plan Addendum

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](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.

Thank you for your cooperation. Should you have any questions regarding this letter, 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

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Dennis S. Dettloff, Delta, 11050 White Rock Road, Suite 110, Rancho Cordova, CA 95670  
Donna Drogos, ACEH (*Sent via E-mail to: [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org)*)  
Paresh Khatri, ACEH (*Sent via E-mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org)*)  
GeoTracker  
File

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>ISSUE DATE:</b> July 5, 2005
	<b>REVISION DATE:</b> March 27, 2009
	<b>PREVIOUS REVISIONS:</b> December 16, 2005, October 31, 2005
<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

- 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 My Le Huynh.
  - 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 @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.