

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 587-6700  
FAX (510) 337-93

February 6, 2009

Mr. Cory Kauffmann  
Cruise America, Inc.  
11 West Hampton Avenue  
Mesa, AZ 85210

Subject: Fuel Leak Case No. RO0002449 and Geotracker Global ID T06019713704, Cruise America, 796 66<sup>th</sup> Avenue, Oakland, CA 94621

Dear Mr. Kauffman:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the most recently submitted document entitled, "*Soil Excavation Workplan*," dated February 4, 2009. The "*Soil Excavation Workplan*," which was prepared by AEI Consultants, proposes excavation of soil in the area of soil boring SB-18. Elevated concentrations of fuel hydrocarbons and oxygenates were detected in soil and groundwater samples from soil boring SB-18, which was advanced in the area of the former gasoline UST. Total petroleum hydrocarbons as gasoline (TPHg) and MTBE were detected in soil samples from boring SB-18 at concentrations up to 1,500 and 13 milligrams per kilogram (mg/kg), respectively. TPHg, MTBE, and TBA were detected in a grab groundwater sample collected from boring SB-18 at concentrations up to 8,500, 1,100, and 1,000 micrograms per liter, respectively.

The proposed scope of work is conditionally approved for implementation provided that the technical comments below are addressed during the proposed soil excavation. 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, perform the proposed work, and send us the reports described below.

**TECHNICAL COMMENTS**

1. **Depth of Excavation.** The Work Plan indicates that the estimated depth of the excavation will be approximately 5 feet bgs. However, the soil sample collected at a depth of 5 feet bgs in boring SB-18 contained 12 mg/kg of MTBE and the boring log for SB-18 indicates that soil with a gasoline odor was observed to a depth of 6.5 feet bgs. The excavation is to be extended to a sufficient depth to remove visibly stained and odorous soil prior to confirmation soil sampling. Based on the conditions described above, we request that the excavation be extended to a minimum depth of 6.5 feet bgs prior to confirmation sampling in order to remove odorous soil and contaminated soil in the smear zone that acts as a long-term source of groundwater contamination.

2. **Confirmation Soil Samples.** The proposed confirmation soil sampling is generally acceptable. Sidewall confirmation samples are to be collected from the depth interval where the highest PID readings, odor, or visual contamination was observed during excavation. ACEH may direct additional confirmation soil sampling based upon observations in the field during or following excavation. The excavation is to be extended to remove visibly stained and odorous soil prior to confirmation soil sampling. The excavation is to be extended in areas where confirmation soil samples exceed the proposed screening levels discussed in technical comment 4. Please provide a minimum of 48 hours advance notification of confirmation soil sampling (e-mail preferred to [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org)) in order for ACEH to observe conditions and direct any additional confirmation soil sampling required. Please present the results of confirmation sampling in the Soil Excavation Report requested below.
3. **Soil and Groundwater Analyses.** We request that soil and grab groundwater samples be analyzed for Total Petroleum Hydrocarbons as gasoline using EPA Method 8015 and for MTBE, TBA, and BTEX using EPA Method 8260. Please present the analytical results in the Soil Excavation Report requested below.
4. **Soil Screening Levels.** The proposed screening level for confirmation soil samples of 83 mg/kg for TPHg is acceptable. However, the Work Plan does not describe screening levels for other analytes. The proposed screening level for TPHg of 83 mg/kg corresponds to the Environmental Screening Level (ESL [San Francisco Bay Regional Water Quality Control Board, May 2008]) for shallow soil. We request that you use similarly applicable ESLs as screening levels for MTBE, TBA, and BTEX for the confirmation soil samples.
5. **Geotracker EDF Submittals.** A review of the SWRCB Geotracker website indicates that no data or reports have been submitted to Geotracker for your site. Pursuant to CCR Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload all analytical data (collected on or after September 1, 2001) and a copy, in PDF format, of all reports prepared after July 1, 2005.

#### **TECHNICAL REPORT REQUEST**

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **May 11, 2009** – Soil Excavation 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/cleanup/electronic\\_reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

#### 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.

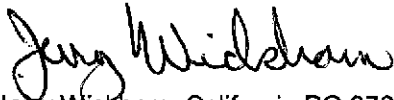
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**AGENCY OVERSIGHT**

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) 567-6791 or send me an electronic mail message at [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org).

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297  
Senior Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Leroy Griffin  
Oakland Fire Department  
250 Frank H. Ogawa Plaza, Ste. 3341  
Oakland, CA 94612-2032

Robert Flory  
AEI Consultants  
2500 Camino Diablo, Suite 200  
Walnut Creek CA 94597

Peter McIntyre  
AEI Consultants  
2500 Camino Diablo, Suite 200  
Walnut Creek CA 94597

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
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)