

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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March 21, 2007

Messrs. Rashid Ghafoor and Waseem Iqbal
226 Havenwood Circle
Pittsburg, CA 94565-7364

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

Dear Messrs. Ghafoor and Iqbal:

Subject: Fuel Case RO0002931 & Global ID # T0600174667, Shore Acres Gas,
403 E. 12th St., Oakland, CA 94606

Alameda County Environmental Health (ACEH) has reviewed the file for the subject site including the Phase II Site Assessment Field Activities Shore Acres Gas 403 E. 12th St. Oakland, California prepared by Geofon Incorporated. Two borings were advanced to a depth of 20' below ground surface (bgs) and two soil samples collected from each borehole. Up to 600 parts per million (ppm) total petroleum hydrocarbons as diesel (TPHd), 3600 ppm total petroleum hydrocarbons as gasoline (TPHg), and 17, 180, 98, 440, 0.54 ppm benzene, toluene, ethyl benzene, xylenes and MTBE, respectively were detected in the soil samples. We have determined that additional information is required to investigate the release of petroleum hydrocarbons to soil and groundwater at this site. Please address the following technical comments and submit the requested technical report requested below.

TECHNICAL COMMENTS

1. Conduit Study

The purpose of the conduit study is to locate potential migration pathways and potential conduits and determine the probability of the plume encountering preferential pathways and conduits that could spread the contamination. Of particular concern is the identification of abandoned wells and improperly-destroyed wells that can act as conduits to deeper water bearing zones.

We request that you perform a conduit study that details the potential migration pathways and potential conduits (utilities, storm drains, etc.) that may be present in the vicinity of the site. Provide a map showing the location and depth of all utility lines and trenches including sewers and storm drains within and near the plume area.

The conduit study shall include a detailed well survey of all wells (monitoring and production wells: active, inactive, standby, destroyed (sealed with concrete), abandoned (improperly destroyed); and dewatering, drainage, and cathodic protection wells) within a ¼ mile radius of the subject site. As part of your detailed well survey, please perform a background study of the historical land uses of the site and properties in the vicinity of the site. Use the results of your background study to determine the existence of unrecorded/unknown (abandoned) wells, such as old deep agricultural wells, that can act as pathways for migration of contamination at and/or from your site. Please review historical maps such as

Sanborn maps, aerial photos, etc., when performing the background study. Provide a map(s) showing the location of all wells identified in your study.

Using the results of your conduit study and data from previous investigations at the site you are to develop the initial three-dimensional conceptual model of site conditions. You are to use this initial conceptual model to determine the appropriate configuration for sampling points in the Soil and Water Investigation work plan. Discuss your analysis and interpretation of the results of the conduit study (including the detailed well survey) and report your results in the Work Plan. Describe your initial conceptual model of site conditions and explain your rationale for the configuration of sampling points in the work plan requested below.

2. Contaminant Plume Definition

The purpose of contaminant plume definition is to determine the three-dimensional extent of contamination (MTBE, petroleum products, and associated blending compounds and additives) in soil and groundwater from the unauthorized release at your site.

The three-dimensional extent of contamination in soil and groundwater at your site is undefined. Therefore, we request that you perform a detailed, expedited site assessment using depth discrete sampling techniques on borings installed along transects to define and quantify the full three-dimensional extent of MTBE, Total Petroleum Hydrocarbons, Benzene and other contamination in groundwater.

A substantial part of your plume(s) should be defined with one mobilization by using expedited site assessment techniques at your site. The appropriately-qualified professionals performing field work at your site will be using the data obtained from the field work to refine the initial three-dimensional conceptual model of site conditions developed during the conduit study and review of background information. Using expedited site assessment techniques, the appropriately-qualified professionals are to analyze the field data as it is collected, refine the conceptual model as new data is produced and evaluated, and modify the sampling and analysis program as needed, filling data gaps and resolving anomalies prior to demobilization.

Expedited site assessment tools and methods are a scientifically valid and cost-effective approach to fully define the three-dimensional extent of the plume. Technical protocol for expedited site assessments are provided in the U.S. Environmental Protection Agency's (EPA) "Expedited Site Assessment Tools for Underground Storage Tank Sites: A Guide for Regulators" (EPA 510-B-97-001), dated March 1997.

Discuss your proposal for performing this work in the work plan requested below. Report the results of your investigation in the Soil and Water Investigation (Results of Expedited Site Assessment) Report requested below.

TECHNICAL REPORT REQUEST

Please submit the following technical report to our office according to the following schedule:

- April 27, 2007- Work Plan for Contaminant Plume Definition

ELECTRONIC SUBMITTAL OF REPORTS

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was 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).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at barney.chan@acgov.org.

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

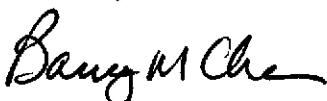
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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.

If you have any questions, please call me at (510) 567-6765.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: files, D. Drogos

Mr. Dave Marks, Geofon Inc., 4620 Northgate Blvd #155, Sacramento, CA 95834

Mr. Sunil Ramdass, SWRCB Cleanup Fund, 1001 I St., P.O. Box 944212,
Sacramento, CA 94244