

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



F

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

August 10, 2007

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

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 May 25, 2007 Expedited Site Assessment Work Plan Shore Acres Gas, 403 E. 12th St. Oakland, California prepared by Insight Incorporated. The work plan responds to ACEH's March 3, 2007 request for additional site characterization. Previous results from two borings advanced to a depth of 20' below ground surface (bgs) reported 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. Nine temporary wells are proposed for soil and groundwater sampling, then four permanent wells are proposed after groundwater gradient has been determined. The temporary wells would then be properly decommissioned. Prior to performing this work, we request you address the following technical comments and submit the requested technical report.

TECHNICAL COMMENTS

1. Estimated Site Gradient- Based upon your consultant's record search, no wells were located within a ¼ mile radius of the site. Therefore, no current sites exist with monitoring wells to estimate groundwater depth or gradient. Insight states from Geotracker, the inferred gradient is easterly, however, we believe that it is not likely in that direction. The gradient at a closed site at 450 E. 14th (International Blvd.) was reported as northwest and depth to water was from 8-13' bgs. If we look at the nearest water bodies from the site, Lake Merritt Channel, Lake Merritt and the Oakland Inner Harbor, it appears that the gradient should be northwest, west or southwest, but not easterly as inferred. In addition, although the initial Geofon borings did not encounter groundwater at a depth of 20' bgs, this appears to be deeper than would be expected.
2. Proposed Soil and Groundwater Investigation- As noted, nine temporary ¾ inch wells with a 5 foot screen interval are proposed to be installed to a depth of 5' below first encountered water. After gradient is determined, four conventional wells are proposed, one of which will be designated as a "deep" well. It is unclear how the "deep" well will differ from the other three as it will be screened 5' below the established groundwater, seemingly similar to the other wells. This "deep" well is an attempt to determine the vertical of contamination. We do not concur with the

proposed work plan and request the following comments be incorporated into an amended work plan.

- The borings should be placed and sampled to determine the lateral and vertical extent of contamination. Assuming a generally westerly gradient (possibly northwest or southwest), the borings should be placed in a transect down-gradient and perpendicular to the source(s). The potential sources at this site are the USTs and the pump islands. Attached please find a site plan with boring locations noted in this type of array.
 - The use of 3/4 inch wells for groundwater sampling and gradient determination appears excessive in an initial site characterization. Because gradient may be variable, it may be risky to determine gradient based using this type of method. Alternatively, we recommend sampling soil and groundwater from these borings and using a combination of contaminant contours and professional judgment to determine permanent well locations. We concur with sampling and screening soils every 5 feet, at changes in lithology, at locations of obvious contamination, at the capillary fringe and as deep as necessary to determine the vertical extent of contamination, including sampling saturated soils, until a clean sample is obtained. Please do not limit your soil samples to two per each borehole, rather base it upon the actual borehole conditions. In the event that multiple water bearing zones are encountered, you should attempt to sample each zone. Based upon your results, permanent well locations should be proposed in your report. If a mobile lab would allow this work to be done faster and therefore be cost effective, it should be considered as proposed.
3. Utilities As Preferential Pathways- Insight states that though they were unable to verify depths of utilities in the nearby streets it is reasonable to assume that utility trenches provide preferential pathways for contaminant migration. This conclusion is best made after this investigation is performed, since that type of statement may infer that further investigation along utilities will be required.
 4. Maximum Laboratory Reporting Limits- These limits are presented in Table 1 of this work plan and deserve agency comment. The maximum laboratory reporting limit is a function of the laboratory instrumentation and the quality and concentration of the sample ie dirty samples or highly contaminated samples will have higher reporting limits. These limits should not be PRGs or any other health based cleanup level as indicated in this table.

TECHNICAL REPORT REQUEST

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

- September 10, 2007- 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

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](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.

August 10, 2007

Page 4 of 4

Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

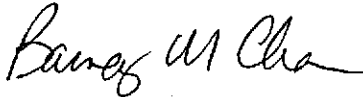
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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

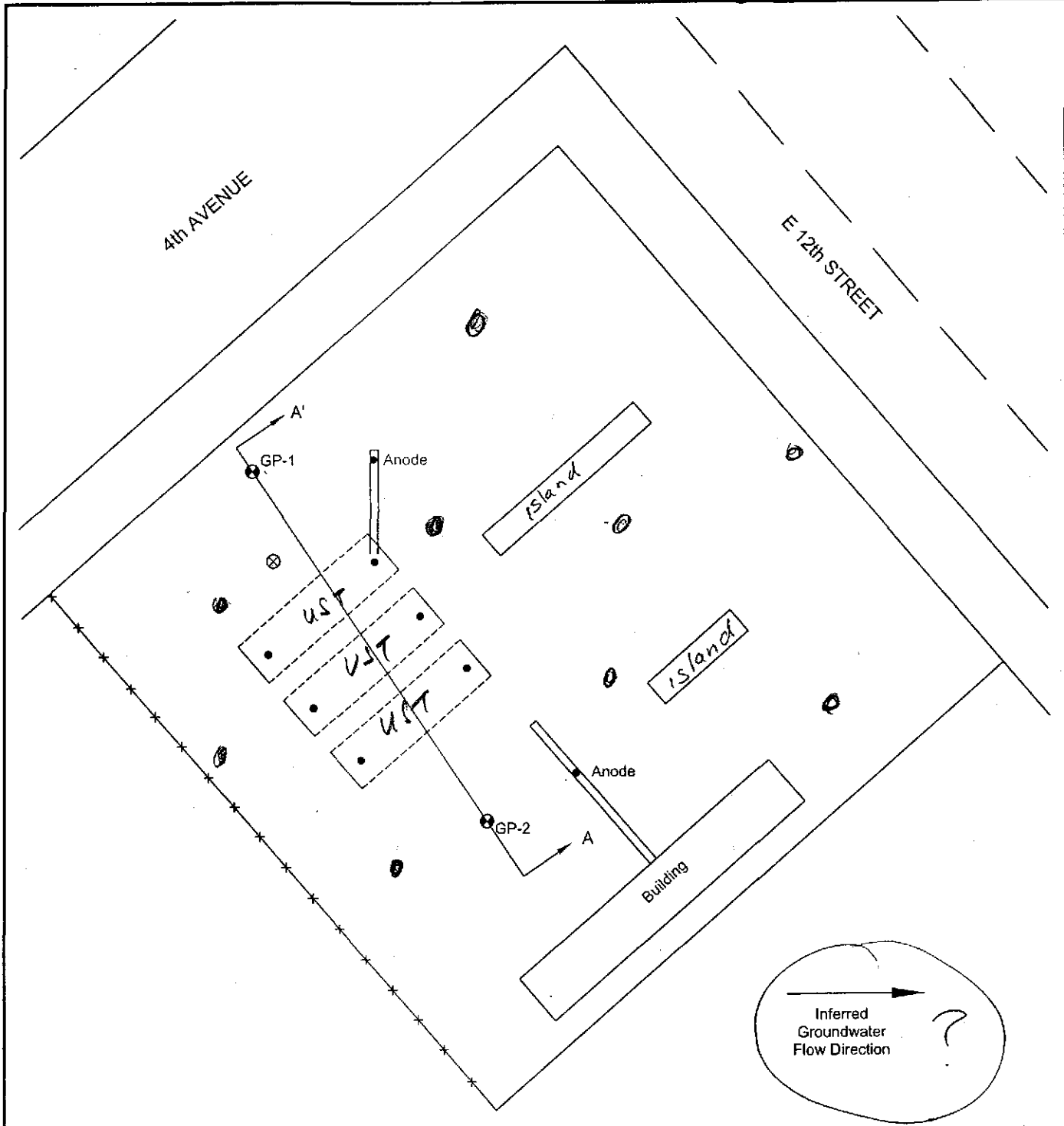
Enclosure- revised boring locations

cc: files, D. Drogos

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

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

R02931



LEGEND

- GP-2 DPT Sampling Location
- ⊗ GP-1 First Attempt (refusal at 1.5')
- ▭ Pump Island
- ▭ Existing Underground Storage Tank
- *-* Fence
- A'-A Prime Line

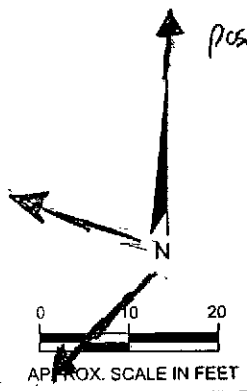


Figure 2
SITE PLAN WITH BORING LOCATIONS
 Shore Acre Gas
 403 E 12th Street
 Oakland, California

GEOFON
 INCORPORATED

DRAWN: J. Hurst	DATE: 5/24/07	5-70004
FILE: Projecta\5-70004\Boring locations.dwg		