

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS; Agency Director



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ENVIRONMENTAL HEALTH SERVICES
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November 21, 2007

Mr. Faizi Pourhosseini
State of California
Department of General Services
RESO/PSB/Seismic & Special Programs
707 3rd Street, Suite 4-430
West Sacramento, CA 95605

Subject: Fuel Leak Case No. RO0002950 and Geotracker Global ID T06197636657, CHP
Oakland, 3601 Telegraph Avenue, Oakland, CA 94609

Dear Mr. Pourhosseini:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site, including the report entitled, "Soil and Groundwater Investigation, California Highway Patrol – Oakland, 3601 Telegraph Avenue, Oakland, California, 94609," dated March 26, 2007, prepared on your behalf by Kleinfelder. The report summarizes the results from soil and groundwater sampling activities conducted at the site in January 2007. Soil and groundwater sampling was conducted to help assess the extent of petroleum hydrocarbons released from an underground storage tank (UST) system and lead associated with a demolished gun range building.

A fuel leak was detected during tank upgrade activities on March 19, 1997. A soil sample collected from the site on March 19, 1997 contained 110 milligrams per kilogram (mg/kg) of total petroleum hydrocarbons (TPH) as gasoline and 0.13 mg/kg of total xylenes. Soil and groundwater sampling was conducted in the area of the UST in January 2007. TPH as gasoline was detected in groundwater at concentrations up to 4,300 micrograms per liter ($\mu\text{g/L}$). MTBE was detected in groundwater at concentrations up to 38 $\mu\text{g/L}$. The horizontal and vertical extent of fuel hydrocarbon and oxygenate contamination has not been defined. Therefore, we request that you submit a **Work Plan for further site assessment by February 15, 2008**.

We recommend that your investigation incorporate expedited site assessment techniques. Expedited site assessment tools and methods are a scientifically valid and cost-effective approach to fully define the three-dimensional extent of groundwater contamination. Technical protocol for expedited site assessments are provided in the U.S. Environmental Protection Agency's "Expedited Site Assessment tools for Underground Storage Tanks: A Guide for Regulators," (EPA 510-B-97-001), dated March 1997. Therefore, we recommend that you utilize direct push technology to collect soil samples and depth-discrete groundwater samples prior to the installation of groundwater monitoring wells. Sampling locations should be located to assess the extent of soil and groundwater contamination. Other options for additional investigation may be appropriate to define contamination at your site.

Following the demolition of a former gun range building in June 2006, approximately 10 inches of lead-contaminated soil was reportedly removed from the south side of the building. Analytical results from confirmation soil samples indicated that residual soils on the south side of the building contained elevated concentrations of lead following excavation. In January 2007, soil

samples were collected from several soil borings in the area of the lead removal. Lead was detected in soil at concentrations up to 562 mg/kg. As discussed in the technical comments below, additional information is required to define the next actions required for lead in soil at the site. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

REQUEST FOR INFORMATION

The only document in ACEH's case files for the subject site is the report entitled, "Soil and Groundwater Investigation, California Highway Patrol - Oakland, 3601 Telegraph Avenue, Oakland, California, 94609," dated March 26, 2007, prepared on your behalf by Kleinfelder. No report on the 2006 removal of lead-impacted soil adjacent to the former shooting range is in ACEH files. Please submit copies of any other reports you have documenting environmental investigation and remediation activities or other work related to the UST system/site with the work plan requested below.

TECHNICAL COMMENTS

- 1. Scaled Map and Former Area of Excavation.** The only map showing the area of excavation appears to be a hand drawn sketch dated June 20, 2006 with no scale. Please provide a scaled map showing the area of excavation, former building foundation, types of surfaces (asphalt, concrete, bare ground, etc.), and soil sampling locations. In addition, please identify how the horizontal limits of the excavation were determined. Were all unpaved areas excavated? The January 2007 soil boring locations are shown within the outline of the former shooting range building on an aerial photograph of the site entitled, "Boring Location Map, Plate 2." Please show the January 2007 soil borings on a scaled map with the area of the 2006 excavation. Please present the requested information and a scaled map in the Work Plan requested below.
- 2. Other Potential Areas with Elevated Concentrations of Lead.** Please describe the rationale for sampling and excavating only along the south side of the former building. Were there any other potential locations where lead may have accumulated outside the building such as discharges from ventilation systems? Are there any downwind areas that may have been affected? Please present the requested information and/or a proposed scope of work to address these issues in the Work Plan requested below.
- 3. Soil Removal Activities during Demolition.** Please indicate whether soil excavation and removal occurred prior to, during, or following demolition of the adjacent building and whether there was a potential for lead-impacted soil to be moved to other areas during demolition and any grading activities. Please describe the type of building foundation for the former shooting range and whether the former building and adjacent areas are now covered by paved surfaces or bare soil. We request documentation regarding the disposal of lead-impacted soil from the 2006 soil excavation. Please present the requested information and/or a proposed scope of work to address these issues in the Work Plan requested below.

TECHNICAL REPORT REQUEST

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

- **February 15, 2008 – Work Plan**

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

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).

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

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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

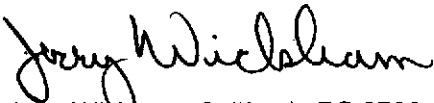
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



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

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Susan Gardner, Kleinfelder, 3077 Fite Circle, Sacramento, CA 95827-1815

Leroy Griffin, Oakland Fire Hazardous Materials Unit, 250 Frank Ogawa Plaza, Suite 3341
Oakland, CA 94612

Donna Drogos, ACEH
Jerry Wickham, ACEH
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