

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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March 19, 2008

Mr. Leo Puig  
Amcal Housing, Inc.  
4545 North West Avenue, Suite 118  
Fresno, CA 93705

Subject: SLIC Case RO0002958 and Geotracker Global ID SLT19701216, Amcal Multi-Housing Development, 555 98<sup>th</sup> Avenue, Oakland, CA 94603

Dear Mr. Puig:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including the recently submitted document entitled, "*Technical Comments - Response to Alameda County Health Care Service (ACHS) Letter Dated February 29, 2008*," prepared by SCS Engineers and dated March 17, 2008. On March 10, 2008 we also received a Preliminary Title Report and site plan for the proposed residential development.

Based upon our review of the March 17, 2008 response to technical comments, previous investigation data, and the site development plans, potential issues related to the hydraulic hoist and oil water separator appear to have been adequately addressed. However, review of the site development plans indicates that residential units will be constructed on the ground floor in the area of the former fuel USTs. As discussed in technical comment 1 below, our case review indicates that the potential for vapor intrusion to individual residential units has not been fully evaluated. Therefore, we request that you submit a work plan to address the potential for vapor intrusion to indoor air in the area of the former USTs.

**TECHNICAL COMMENT**

- Potential for Vapor Intrusion in Area of Former Fuel USTs.** During tank removal activities in December 1993, soil contamination was detected in the area of the former fuel underground storage tanks (USTs) located northeast of the former service station building. Soil samples collected from the base of the UST excavation (12 feet bgs) on December 7, 1993 contained total petroleum hydrocarbons as gasoline (TPHg) at concentrations ranging from 230 to 12,000 milligrams per kilogram (mg/kg) and benzene at concentrations ranging from 0.8 to 11 mg/kg. Soil removed from the tank excavation was stockpiled on site and sampled on January 22, 1996. Based on the results of the stockpile soil sampling, the stockpiled soil was used as backfill for the former UST excavation. However, there does not appear to be any documentation of soil treatment prior to reuse as excavation backfill. The proposed development includes plans for residential units on ground level in the area of the former USTs. Two soil vapor samples were collected in the general area of the former USTs as part of a soil vapor investigation conducted on May 31, 2007. Soil vapor sample SV5, which appears to have been collected within the footprint of the former service station building, did not contain detectable concentrations of volatile organic compounds

(VOCs). Soil vapor sample SV3, which was collected immediately south of the former fuel dispensers, also did not contain detectable concentrations of VOCs. Although these soil vapor samples did not detect VOCs in the general area of the USTs, these sampling locations do not appear to be sufficiently close to the former USTs to evaluate potential vapor intrusion to residential units located directly above the former USTs. In addition, the reporting limit for VOC analysis of soil vapor samples SV3 and SV5 was 0.1 micrograms per liter ( $\mu\text{g/L}$ ), which is equivalent to 100 micrograms per cubic meter ( $\mu\text{g/m}^3$ ). The Environmental Screening Level (San Francisco Bay Area Regional Water Quality Control Board, November 2007) for potential vapor intrusion from soil vapor to indoor air is 84  $\mu\text{g/m}^3$  for residential land use. Therefore, the reporting limit exceeds the Environmental Screening Level for residential land use. We request that you further evaluate the potential for vapor intrusion to indoor air in the area of the former USTs. Additional soil vapor sampling in the area of the former USTs is acceptable. We also request that you extend a minimum of one soil boring in the area of the former USTs to assess the residual soil and groundwater contamination left in place below the tank backfill material.

2. **Geotracker EDF Submittals.** Beginning July 1, 2005, electronic submittal of a complete copy of all reports (LUFT or SLIC) is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload copies of all reports post July 1, 2005, to the SWRCB's Geotracker database website in accordance with the above-cited regulation.

#### **TECHNICAL REPORT REQUEST**

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

- **April 30, 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

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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)).

#### 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.

#### 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

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Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

Ryan Marcos  
SCS Engineers  
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Donna Drogos, ACEH  
Jerry Wickham, ACEH  
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