



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

September 16, 2014

Mr. DeLong Liu  
DeLong Oil, Inc.  
2501 N. Main Street  
Walnut Creek, CA 94597  
(sent via electronic mail to [delongliu@yahoo.com](mailto:delongliu@yahoo.com))

DDJ Property Holding, Inc  
2501 North Main Street  
Walnut Creek, CA 94597

Subject: Work Plan Addendum Request; Fuel Leak Case No. RO0003140; (Global ID # T10000005974); DeLong Oil, 1716 Webster Street, Alameda, CA 94501

Dear Mr. DeLong Liu:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Site Status Report and Data Gap Work Plan*, dated July 31, 2014. The report was prepared and submitted on your behalf by Alfa Environmental Remediation Services, Inc (Alfa). Based on the information contained in the referenced report ACEH has sufficient concerns in regards with ACEH's previous directives and damage to site groundwater monitoring wells to request an addendum to the work plan prior to approval of work at the site. ACEH also has concerns in regards to the appropriateness of the proposed soil bore locations as described further below.

Based on the review of the case file ACEH requests that you address the following technical comments and send us the documents requested below.

#### **TECHNICAL COMMENTS**

1. **Condition of Wells MW-1 and RW-1** – The referenced report included photographs of the surface completion of wells MW-1 and RW-1. It appears that surface pavements around the wells are currently in a state of good repair; however, photographs taken on June 6, 2014 by Broadbent & Associates indicate otherwise (attached). The June 10, 2014 Notice to Comply letter requested multiple lines of evidence that the wells are suitable for monitoring and sampling at the site. These included the tagging of total well depths to determine if sediment has partly or entirely filled the well bore, downhole camera survey results as appropriate, and a resurvey of repaired wells to Geotracker standards to validate well elevations and locations. If otherwise, the wells will also require destruction and replacement by DeLong Oil. These tasks were not conducted, proposed, or discussed in the referenced work plan, and are requested to be incorporated into a work plan addendum, by the date identified below.
2. **Request for Revised Figure** – Based on the figure included in the referenced work plan, ACEH has concerns with the proposed scope of work as follows:
  - a. **Placement of Bores** - The work plan proposed the installation of 10 soil bores around the location of the former waste oil underground storage tank (UST); however, the figure placed the location of the former waste oil UST at a new location in the southeastern corner of the site. This is at least the third location depicted in site figures (see attached figures); thus ACEH cannot determine the appropriateness of the bore locations as this may cause the bores to be installed at an incorrect location that would not adequately characterize the former waste oil UST location.
  - b. **Accuracy of Figure** – Part of the inability to determine the appropriateness of the bore locations, may be associated with the accuracy of the figure. The new market building is indicated to be 30 feet in depth north to south; however, the bar scale associated with figure

indicates the north to south dimension should be approximately 11 feet (1 foot to 1/8 inch). Using the 30 foot building depth suggests the former UST was located approximately 53 feet north of the southern property line, whereas previous figures indicate it was between 17 and 22 feet. Photographs available to ACEH indicate the former waste oil UST was located to the east of the former service station building, towards the southern end.

- c. Location of Well MW-3** - The location of lost well MW-3 has been placed in two different locations relative to the former waste oil UST (see attached figures previously discussed). This affects the ability to relocate the well for the proposed well destruction under permit. This may also affect well MW-2, also proposed to be destroyed, should the surface expression of the well have also been lost. The use of Geotracker survey coordinates for both wells will assist in this effort for the figure and in the field.
  - d. Request for Revised Figure** – As a consequence of these concerns, ACEH requests revisions to the figure, including the depiction of the outline of the former service station building in the background field of the figure (grayed out or other method to depict a former structure), in order to determine the appropriateness of the proposed scope of work prior to work approval. Please submit the revised figure in the requested work plan addendum by the date identified below.
- 3. Analytical Documentation for Soil Export and Import Fill** – The referenced report documents the manifested disposal of 41 tons of surplus soil from the site; however, did not provide analytical reports to document disposal analytical sampling of the soil. ACEH is aware of stockpile sampling collected during the initial removal of the UST, but not for landfill disposal. Additionally, the June 10, 2014 Notice to Comply letter requested documentation of import fill characteristics. If recycled import fill was used, the letter requested documentation of the source and contaminant characterization of the fill in order to determine the contaminant quality of the imported fill. Please submit this data or propose additional subsurface characterization to collect the data in the requested work plan addendum, by the date identified below.
  - 4. Well Ownership** – It is the understanding of ACEH that BP is willing to transfer ownership of all wells associated with the site (on- and off-site) to Delong Oil, and that a transfer agreement will be forthcoming. This appears to be an appropriate course of action as the wells will be available for your use to investigate the recent releases. Please be aware that a transfer agreement must be in place prior to the closure of the older case (RO0000281), otherwise all wells must be destroyed to obtain closure of the older case and will not be available for your use.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below, according to the following schedule:

- **October 24, 2014** – Work Plan Addendum  
File to be named: WP\_ADEND\_R\_YYYY-mm-dd
- **60 Days After Work Plan Approval** – Soil and Groundwater Investigation Report  
File to be named: SWI\_R\_YYYY-mm-dd

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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address does not appear on the cover page of this notification, ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Mr. DeLong Liu  
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If you have any questions, please call me at (510) 567-6876 or send me an electronic mail message at [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org).

Sincerely,

Mark E. Detterman, PG, CEG  
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations  
Electronic Report Upload (ftp) Instructions

Attachment 2 – Photographs of wells MW-1, MW-2, RW-1, and Site View; 5 pages

Attachment 3 – Site Figures; 3 pages

cc: Valentin Constantinescu, Alfa Environmental Remediation Services, Inc, 9000 Crow Canyon Road, Suite S, Danville, CA 94506; (sent via electronic mail to [Val@alfaenv.com](mailto:Val@alfaenv.com))

Mr. Chuck Carmel, Atlantic Richfield Company, San Ramon, CA 94583, (sent via electronic mail to [Charles.Carmel@bp.com](mailto:Charles.Carmel@bp.com))

Kristene Tidwell, Broadbent, 875 Cotting Land, Suite G, Vacaville, CA 95688  
(sent via electronic mail to [Ktidwell@broadbentinc.com](mailto:Ktidwell@broadbentinc.com))

Rob Miller, Broadbent, 875 Cotting Land, Suite G, Vacaville, CA 95688  
(sent via electronic mail to [Rhmillier@broadbentinc.com](mailto:Rhmillier@broadbentinc.com))

Dilan Roe (Sent via electronic mail to [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))  
Mark Detterman (sent via electronic mail to [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))  
Electronic File, GeoTracker

## Attachment 1

### Responsible Party(ies) Legal Requirements / Obligations

#### REPORT REQUESTS

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.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)).

#### 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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> May 15, 2014
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

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

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- 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)

## 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 [deh.loptoxic@acgov.org](mailto:deh.loptoxic@acgov.org)
  - 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, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
  - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
  - 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 [deh.loptoxic@acgov.org](mailto:deh.loptoxic@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 @acgov.org. (e.g., 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) If site is a new case without an RO#, use the street address instead.
  - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.

# ATTACHMENT 2





1716 Webster Street, Alameda RW-1; June 6, 2014



1716 Webster Street, Alameda MW-1; June 6, 2014





1716 Webster Street, Alameda MW-2; June 6, 2014



1716 Webster Street, Alameda; June 6, 2014  
Site View



Photo Log

Facility #:

Name: WEBSTER 76

Address: 1716 WEBSTER ST, ALAMEDA

Date: 12-5-2013

Photo Taken by: Steven Plunkett



ALAMEDA COUNTY  
ENVIRONMENTAL HEALTH DEPARTMENT  
Certified Unified Program Agency (CUPA)  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577



Description: SITE DEMOLITION WORK AND NEW FOUNDATIONS

Photo # 1 of 7

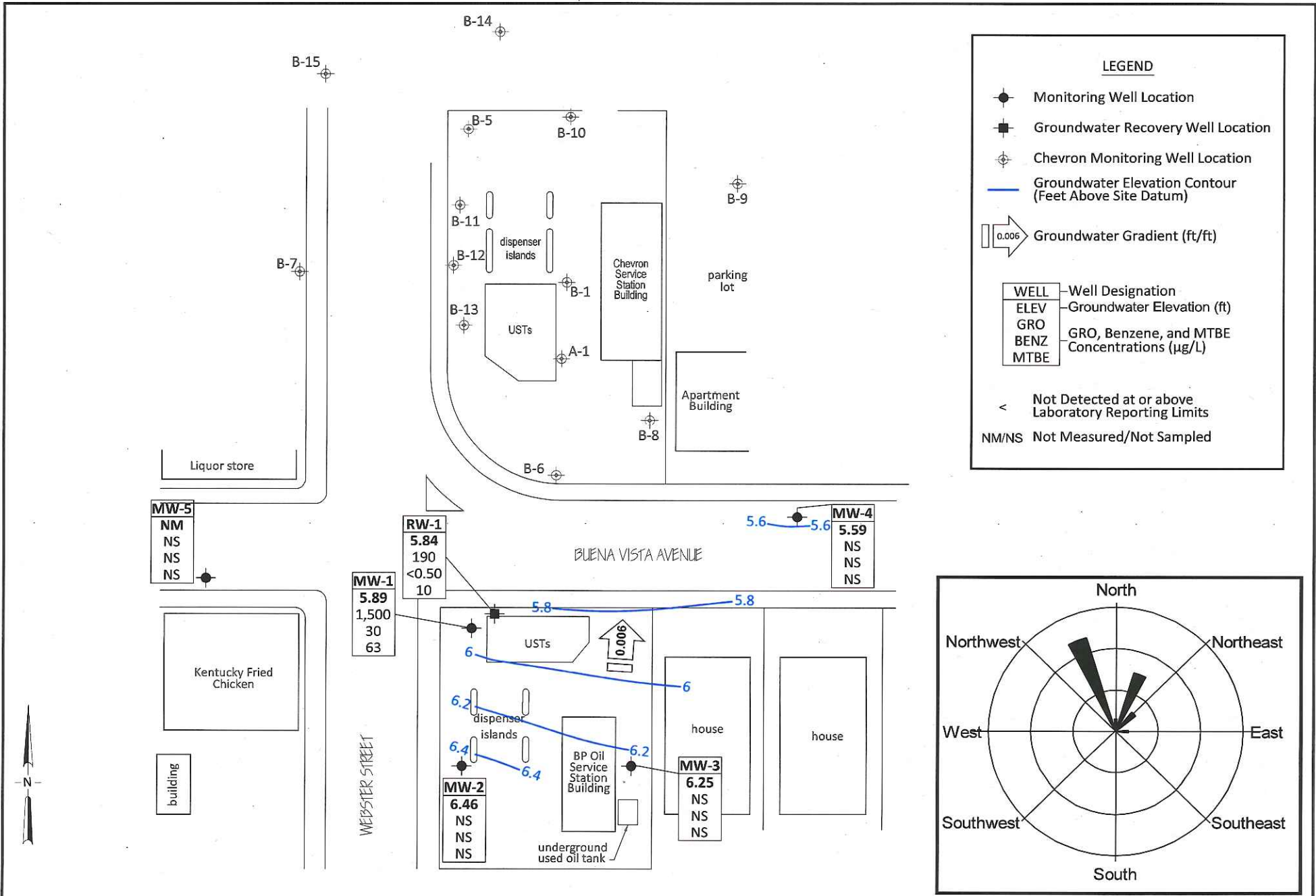


Description: DAMAGED MONITORING WELL

Photo # 2 of 7

# ATTACHMENT 3





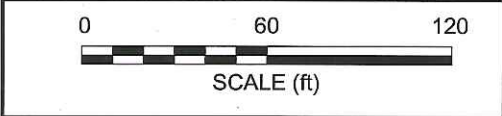
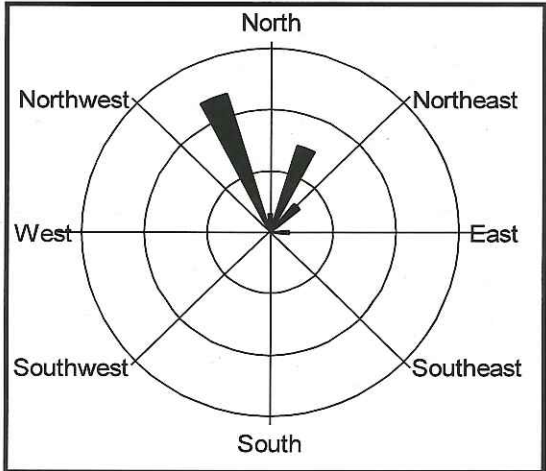
**LEGEND**

- Monitoring Well Location
- Groundwater Recovery Well Location
- Chevron Monitoring Well Location
- Groundwater Elevation Contour (Feet Above Site Datum)
- Groundwater Gradient (ft/ft)

WELL	Well Designation
ELEV	Groundwater Elevation (ft)
GRO	GRO, Benzene, and MTBE
BENZ	Concentrations (µg/L)
MTBE	

< Not Detected at or above Laboratory Reporting Limits

NM/NS Not Measured/Not Sampled



**BROADBENT**  
 875 Cotting Lane, Suite G  
 Vacaville, California 95688  
 Project No.: 06-88-644 Date: 9/6/2013

Station #11104  
 1716 Webster Street  
 Alameda, California

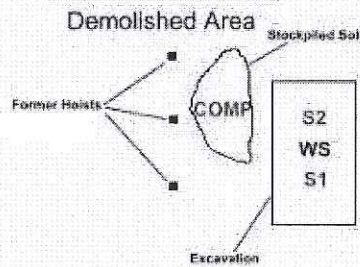
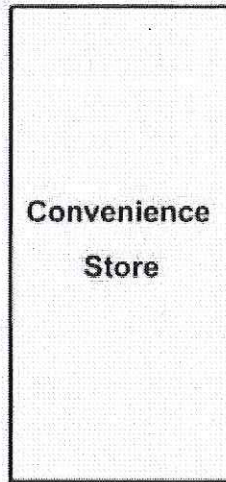
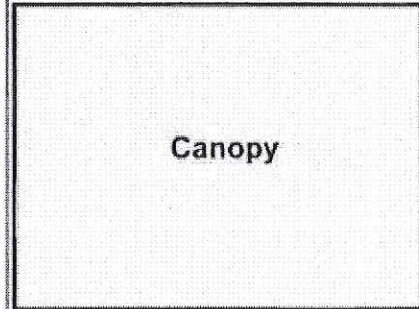
Groundwater Elevation Contour and  
 Analytical Summary Map  
 August 8, 2013

Drawing  
2



Buena Vista Avenue

Webster Street



Analytical Results  
Summary of Hits

S1 - mg/kg (soil sample)

TPH (C10-C28) 6.17

TPH (> C28-C40) 9.09

S2 - mg/kg (soil sample)

TPH (C10-C28) 7.97

TPH (> C28-C40) 13.7

WS (grab water sample)

Acetone 7.6 ug/L

Bromodichloromethane 0.64 ug/L

Chloroform 12.1 ug/L

Methyl chloride 0.39 ug/L

TPH-GRO (C6-C10) 26.6 ug/L

bis (2EHP) 37.0 ug/L

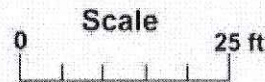
TPH (C10-C28) 18.2 mg/L

TPH (> C28-C40) 46.2 mg/L

COMP (1-4) - mg/kg

TPH (C10-C28) 30.9

TPH (> C28-C40) 213



**SITE MAP**

**FIGURE 1**

**FIRST EXCAVATION**  
**SEPTEMBER 6, 2013**

**WEBSTER 76**  
**1716 WEBSTER STREET**  
**ALAMEDA CALIFORNIA**

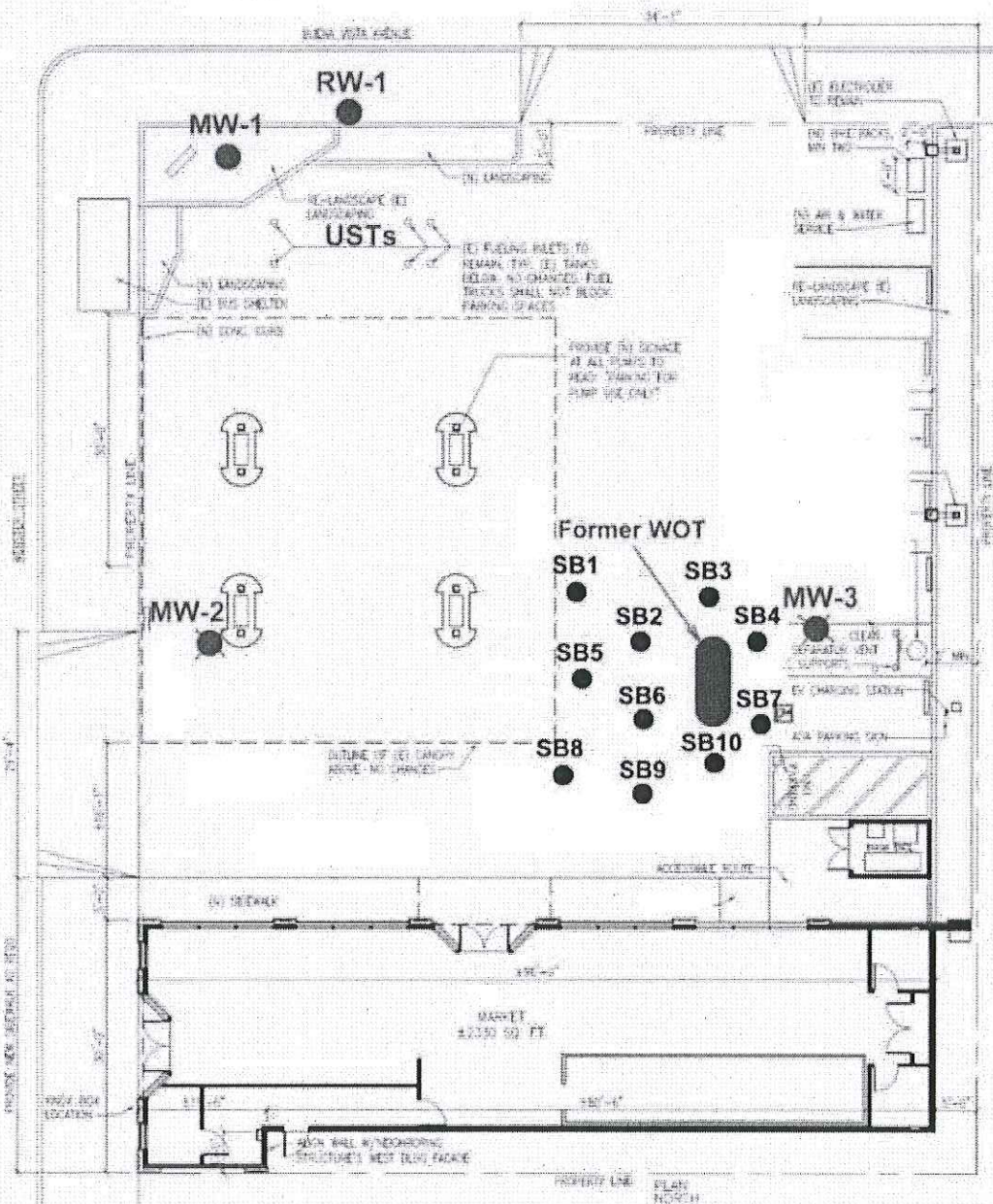
Project No.: WKP7512



**ALFA Environmental**  
**Remediation Services, Inc.**

Approximate Scale





**LEGEND**

- MW-1** Existing Groundwater Monitoring Well Location and Designation
- MW-3** Damaged Groundwater Monitoring Well Location and Designation
- SB2** Proposed Soil Boring Location and Designation

**Proposed Soil Borings - Location Map**

 **ALFA Environmental**  
Remediation Services, Inc.

**Station #11104**  
1716 Webster Street  
Alameda, California

**Project Number: #14018**



Base Map: Daniel Hoy AIA Architecture

Date: July 29, 2014