

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**



AGENCY

REBECCA GEBHART, Acting Director

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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April 19, 2016

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

United Brothers Enterprise, Inc.  
2501 North Main Street  
Walnut Creek, CA 94597

Leatrice Whitney & Paul Alsing  
414 Arden Drive  
Encinitas, CA 92024

Leatrice Whitney & Gloria Alsing  
1007 S. Wellsley Street  
Visalia, CA 93277

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

Dear Responsible Parties:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *Soil and Groundwater Investigation Report*, dated February 29, 2016, and the *First Quarter 2016 Semi-Annual Groundwater Monitoring Report*, dated March 14, 2016. Both reports were prepared and submitted on your behalf by Compliance & Closure, Inc. (CCI). Thank you for submitting the reports.

The referenced site investigation report documented the installation of soil bores B-1 to B-6 to investigate the extent of soil and groundwater contamination associated with the former hydraulic lifts and the former waste oil underground storage tank (UST) in that area of the site. The report also documented the installation of monitoring wells MW-2A and MW-3A, in replacement for two wells (MW-2 and MW-3) lost during station remodeling. Concentrations in soil up to 32.1 milligrams per kilogram (mg/kg) Total Petroleum Hydrocarbons as diesel (TPHd), and 178 mg/kg TPH as motor oil (TPHmo) were documented. Concentrations of TPH as gasoline (TPHg), or benzene, toluene, ethylbenzene, total xylenes (BTEX), methyl tert butyl ether (MTBE), or naphthalene were not detected at varying detection limits.

Recent groundwater concentrations in wells MW-2A and MW-3A were reported up to 41.0 micrograms per liter ( $\mu\text{g/l}$ ) TPHd, and  $<190 \mu\text{g/l}$  TPHmo, significantly less than previously detected concentrations of 18,200  $\mu\text{g/l}$  TPHd and 46,200  $\mu\text{g/l}$  TPHmo shortly after the removal of the waste oil UST. Additionally wells MW-1 and RW-1 contained up to 351  $\mu\text{g/l}$  TPHg, 1,060  $\mu\text{g/l}$  TPHd, 232  $\mu\text{g/l}$  TPHmo, 49.5  $\mu\text{g/l}$  benzene, 48.5  $\mu\text{g/l}$  ethylbenzene, and 56.1  $\mu\text{g/l}$  naphthalene. Groundwater concentrations in well MW-1 and RW-1 are similar to the previous sampling event in August 2013; however, the concentration of benzene appears to be increasing in MW-1.

Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below.

### **TECHNICAL COMMENTS**

- 1. Work Plan Request** – Using four onsite wells, the groundwater gradient at the site appeared to be to the north to northwest. Historic groundwater gradients, utilizing off site wells MW-4 and MW-5, have generally been to the northeast. In order to ensure the residential home immediately east of the subject site is sufficiently protected from elevated concentrations of contaminants in soil and groundwater, ACDEH is in agreement that it is appropriate to collect soil and groundwater samples from several locations to the east and northeast of the former waste oil UST. Please additionally

investigate the nature of the foundation of the offsite residential home in order to determine the vertical separation distance between the foundation and groundwater. Please be aware that cripple walls may indicate the presence of at least a partial basement which will reduce the separation distance between residential receptors and groundwater contamination.

ACDEH additionally notes increasing photoionization detector (PID) responses with depth (rising from 15 to 1,440 PID units between 5 and 15 feet below grade surface) in a number of soil bores, especially B-1, with no overtly associated contamination in soil or groundwater. Because soil bore B-1 is proximal to the former waste oil UST location, it appears appropriate to request the vertical delineation of the contamination, and attempt to determine the source of the PID responses. This is requested to include analysis for halogenated volatile organic compounds (HVOCs).

ACDEH is also in agreement that it is now appropriate to destroy well MW-2. Please coordinate the destruction of the well with the work requested above. Please submit a work plan by the date identified below to undertake these investigation tasks.

2. **Quarterly Groundwater Monitoring** – Due to the presence of two new (replacement) wells MW-2A and MW-3A at the site, it is appropriate to initiate quarterly groundwater monitoring at the site in order to quickly determine pertinent groundwater concentration trends for the site. This expected to move the site more quickly towards potential closure. Additionally, because it has been nearly three years or six years since groundwater monitoring wells MW-4 and MW-5 have been sampled, ACDEH requests that these two wells be sampled during the next quarterly groundwater monitoring event. Should contaminant trends in these wells be similar to previous data, a case for reducing their sampling interval may be appropriate, provided depth to groundwater is measured in the wells in order to construct site vicinity gradient figures.
3. **Groundwater Analytical Suite** – Due to a number of soil and groundwater analytical results with discrete peaks noted in the analytical pattern, increasing PID responses with depth in soil bore B-1, and because the former UST at the southeastern corner of the site was a waste oil UST, it is appropriate to request a full scan HVOC analysis from wells MW-2A and MW-3A. Provided concentrations of concern of non-petroleum hydrocarbon volatile organic compounds are not detected, it may be reasonable to eliminate this analysis thereafter.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACDEH 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:

- **June 24, 2016** – Work Plan Report  
File to be named: WP\_R\_YYYY-mm-dd
- **August 12, 2016** – Second Quarter 2016 Groundwater Monitoring Report  
File to be named: GWM\_R\_YYYY-mm-dd
- **60 Days After Work Plan Approval** – Soil and Groundwater Investigation  
File to be named: SWI\_R\_YYYY-mm-dd
- **November 18, 2016** – Third Quarter 2016 Groundwater Monitoring Report  
File to be named: GWM\_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>.

Mr. Delong Liu  
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If your email address does not appear on the cover page of this notification, ACDEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

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

cc: Gary Mulkey, 4115 Blackhawk Plaza Circle, Suite 100, Danville, CA 94506; (sent via electronic mail to [gary@cci-envr.com](mailto:gary@cci-envr.com))

Dilan Roe, ACDEH, (Sent via electronic mail to [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))

Mark Detterman, ACDEH, (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.

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|---|---|
| <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.