



July 5, 2017

Mr. DeLong Liu
DeLong Oil, Inc.
2501 N. Main Street
Walnut Creek, CA 94597
(Sent via electronic mail to: 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

Subject: Conditional Work Plan Approval; 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 *Revised Off-Site Soil & Groundwater Investigation Work Plan*, dated May 11, 2017. The work plan was prepared and submitted on your behalf by Compliance & Closure, Inc. (CCI). Thank you for submitting the work plan.

The work plan proposed the evaluation of the foundation at the residential house immediately adjacent to the subject site, the installation of one soil bore east of the former waste oil underground storage tank (UST), the collection of soil and grab groundwater samples from the soil bore, and contingent on the findings of the previous listed tasks, the potential collection of three soil vapor samples along the eastern boundary of the subject site, and the potential collection of a soil vapor sample on the adjacent residential property. If offsite access is denied, an additional contingent soil bore was proposed to be installed on Buena Vista Avenue in front of the residence.

Based on ACDEH staff review of the recommendations, and assuming standard protocols previously used at the site are implemented, the recommended scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Work Plan Modifications** – The referenced work plan proposes a series of actions with which ACDEH is in general agreement of undertaking; however, ACDEH requests modifications to the approach as listed below. Please submit a report by the date specified below.
 - a. **Soil Bore Locations** – One soil bore was located approximately 35 feet east of the former waste oil UST location on private residential property. In order to be protective of the house, ACDEH requests the installation of an additional soil bore to the northeast of the former waste oil UST location, essentially between the former UST location and the home. The intent of this soil bore is to directly assess potential contaminant concentrations adjacent to the home. In the event that offsite access is denied, ACDEH requests that the contingent soil bore in Buena Vista Avenue be held pending additional access attempts with ACDEH assistance.
 - b. **Sample Selection Protocols** – The work plan proposes to collect and retain for laboratory analysis soil samples, but did not specify the soil selection protocols. To clarify ACDEH requests the samples be collected at signs of contamination (odors, discoloration, PID detections), significant changes lithology, and at the water interface. Additionally, in order to meet the

requirements of the Low Threat Closure Policy (LTCP), soil samples must be collected within the 0 to 5 foot and the 5 to 10 foot depth intervals, and at indications of contamination at deeper intervals.

- c. **Soil and Groundwater Analytical Suite** – The work plan proposed the analysis of soil and grab groundwater samples for Total Petroleum Hydrocarbons as gasoline (TPHg), TPH as diesel (TPHd), benzene, toluene, ethylbenzene, and total xylenes (BTEX), fuel oxygenates, and naphthalene. ACDEH additionally requests soil and groundwater analysis to include Halogenated Volatile Organic Compounds (HVOCs) due to the atypical distribution of PID detections beneath groundwater near the former UST location. This is anticipated to be protective of a residential house with a potential basement.
 - d. **Light Non Aqueous Phased Liquids (LNAPL)** – The potential for LNAPL was noted at the time of the removal of the UST. Please ensure that an Interface Probe is utilized in the field to determine if LNAPL is present in the soil bores.
 - e. **Number of Soil Vapor Points** – Three contingent soil vapor points were proposed to be installed along the eastern boundary of the subject site, and one on the adjacent residential property, in the event that potentially significant contaminant concentrations are discovered in soil or groundwater at the adjacent offsite property. Should the vapor points be necessary, it appears that the need for the northern vapor point may be limited, and it is possible the point may be eliminated; however, this should be evaluated based on data generated in the field or laboratory.
 - f. **Location of Offsite Vapor Point** – Please ensure any proposed offsite vapor point is placed between the former UST location and the residence. This is intended to ensure a direct measurement of any potential soil vapors that the home may be exposed to.
 - g. **Soil Vapor Probe Depths** – The work plan proposed the installation of the vapor probes to a depth of approximately three feet below grade surface (bgs) due to the potential for shallow groundwater. Should the points be necessary, please ensure the final depth is based on current depth to groundwater measurements from the site due to the potential for short circuiting at the shallow depth of three feet bgs, or at a depth of five feet below the foundation of the house, including basement. The depth of the basement may preclude this installation in conformance with the LTCP; however, the depth must be as deep as possible within field constraints.
 - h. **Shroud Tracer Concentration** – ACDEH noted that a shroud and tracer will be utilized in the contingent vapor sampling event. Please ensure that the tracer concentration is additionally analyzed from each shroud in order to determine that any potential leakage is less than 5% as allowed by Department of Toxic Substances Control (DTSC) guidance.
 - i. **Vapor Analytical Suite** – In the event that the contingent vapor sampling is necessary, please additionally analyze for oxygen, carbon dioxide, and methane, in order to determine the extent biodegradation is occurring beneath the site. Please additionally ensure that naphthalene is analyzed for with TO-17, in conformance with DTSC guidance due to the preferential absorption of naphthalene to plastic tubing (see Appendix E of the guidance).
2. **Semi-Annual Groundwater Monitoring** – Please continue to conduct semi-annual groundwater monitoring and sampling events. Please coordinate the groundwater monitoring and sampling with that conducted for the case associated with the diesel UST at the site; however, please attribute the groundwater monitoring and sampling costs with this case. Please submit reports by the dates identified below.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

Please note that ACDEH has updated Attachment 1 with regard to report submittals to ACDEH. ACDEH will now be requiring a Submittal Acknowledgement Statement, replacing the Perjury Statement, as a cover letter signed by the Responsible Party (RP). The language for the Submittal Acknowledgement Statement is as follows:

I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the SWRCB's Geotracker Website.

Please make this change to your submittals to ACDEH.

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:

- **August 11, 2017** – First Semi-Annual 2017 Groundwater Monitoring Report
File to be named: RO3140_GWM_R_YYYY-mm-dd
- **September 1, 2017** – Site Investigation Report
File to be named: RO3140_SWI_R_YYYY-mm-dd
- **February 9, 2018** – Second Semi-Annual 2017 Groundwater Monitoring Report
File to be named: RO3140_GWM_R_YYYY-mm-dd

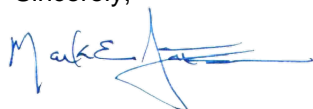
These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

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.

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)

Dilan Roe, ACDEH, (Sent via electronic mail to: dilan.roe@acgov.org)
Paresh Khatri, ACDEH; (Sent via electronic mail to: paresh.khatri@acgov.org)
Mark Detterman, ACDEH, (Sent via electronic mail to: 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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) 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 File Transfer Protocol (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 SCP 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 (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/) for more information on these requirements.

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the SWRCB's GeoTracker website." 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 6731, 6735, and 7835) 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 licensed 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 case meet this requirement. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, late 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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 1, 2016
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions


The Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) 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.
 - 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) Open File Explorer using the Windows  key + E keyboard shortcut.
 - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) On the address bar, type in ftp://alcoftp1.acgov.org.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
 - d) Click Log On.
 - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - f) 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 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.