ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY



DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-93

May 15, 2009

Mr. Thomas Gillis 1153 Copper Verde Lane Modesto, CA 95355

Mr. Clarence Glasper Mandela Trucking P.O. Box 245160 Sacramento, CA 95824

Subject: Fuel Leak Case No. RO0000041 and Geotracker Global ID T0600102246, Mandela Trucking, 1225 Mandela Parkway, Oakland, CA 94607 – Work Plan Approval

Dear Mr. Gillis and Mr. Glasper:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site, including the most recent document entitled, "Monitoring Well Installation Work Plan, Former Mandela Trucking, 1225 Mandela Parkway, Oakland, California 94607," (Work Plan) dated April 15, 2009 and received by ACEH on April 22, 2009. The Work Plan, which was prepared on your behalf by AllWest Environmental, Inc., proposes the installation of three monitoring wells.

The proposed scope of work may be implemented provided that the technical comments below are incorporated during the proposed field investigation. Submittal of a revised work plan or work plan addendum is not required unless an alternate scope of work outside that described in the Work Plan or technical comments below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. Soil Sampling. We request that soil samples be collected continuously for logging and screening to the total depth of the soil boring in order to select the interval for laboratory analysis of soil samples and well screen and filter pack placement. Field screening is to be conducted by a qualified field geologist using visual observations, odor, and measurements using a field photoionization detector (PID) fitted with an appropriate lamp and calibrated for the chemicals of concern. Soil samples are to be extracted from the continuous cores at frequent intervals and placed in sealed jars or plastic bags for measurement and recording of VOC concentrations in the headspace using the PID. Soil samples are to be collected for laboratory analysis from any zones where visible staining, odor, or elevated PID readings are observed in the borings, the collection of soil samples for laboratory analysis at the proposed intervals or alternately, the collection of one soil sample for laboratory analysis at the capillary fringe from each soil

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boring is acceptable. Please present soil sampling results in the Site Investigation Report requested below.

- 2. Filter Pack and Well Screen Intervals. The Work Plan anticipates that the wells will be approximately 20 feet deep with an approximate 10 foot screen interval. We request that: 1) the top of the screen be installed above the static water level for the uppermost unconfined water-bearing zone; 2) that the submerged interval for the well screen not exceed 10 feet in length; and 3) that the well not be installed across any potential confining layers. Based on a review of sites in the surrounding area, we note that static water levels for the upper water-bearing zone are frequently less than 10 feet bgs. Please select the depth of the filter pack and screen based on encountered conditions in the field. As an example, if the static water level of the upper unconfined water-bearing zone is approximately 7 feet bgs, the screen interval should extend from approximately 5 to 15 feet bgs. Please present well installation results in the Well Installation Report requested below.
- 3. **Laboratory Analyses.** The proposed laboratory analyses are acceptable. Please present the soil and groundwater sampling results in the Well Installation Report requested below.

TECHNICAL REPORT REQUEST

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

Well Installation Report – September 15, 2009

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

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Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/elect<u>ronic_reporting</u>).

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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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

Senior Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

Leonard Niles, AllWest Environmental, Inc., 530 Howard Street, Suite 300 San Francisco, CA 94105

Donna Drogos, ACEH Jerry Wickham, ACEH File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)

ISSUE DATE: July 5, 2005

REVISION DATE: March 27, 2009

PREVIOUS REVISIONS: December 16, 2005,

October 31, 2005

SECTION: Miscellaneous Administrative Topics & Procedures

SUBJECT: 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

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

Additional Recommendations

• A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

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 dehloptoxic@acgov.org

Or

- ii) Send a fax on company letterhead to (510) 337-9335, to the attention of My Le Huynh.
- 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 ttp://alcoftp1.acgov.org
 - (i) Note: Netscape and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - 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 dehloptoxic@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.