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ENVIRONMENTAL PROTECTION  
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September 4, 2012

Shane Nolan (*Sent via E-mail to: [snolan@platinum-energy.net](mailto:snolan@platinum-energy.net)*)

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Ed Ralston (*Sent via E-mail to: [Ed.C.Ralston@p66.com](mailto:Ed.C.Ralston@p66.com)*)

ConocoPhillips

76 Broadway

Sacramento, CA 95818

Subject: Request for a Work Plan, Fuel Leak Case No. RO0000229 and Geotracker Global ID T0600101463, UNOCAL #5325, 3220 Lakeshore Avenue, Oakland CA 94610

Dear Responsible Parties:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the most recent documents entitled, "*Workplan for Surfactant Infiltration and Batch Extraction*," dated May 11, 2012 prepared by Antea Group and "*Semi-Annual Summary Report, July through December 2011*" dated January 5, 2012 prepared by Antea Group.

The Work Plan proposal includes a series of three soil washing events with surfactant infiltration using Ivey-sol surfactant and three corresponding batch extraction events. The soil washing Work Plan states two wells, identified as U-1 and U-2, will be used for infiltration with extraction performed at seven wells, including the wells used for infiltration. The Work Plan proposes to determine the radius of influence of the infiltration wells after the introduction of the surfactant.

ACEH is not in agreement with the work plan proposal. We request that you address the following technical comments, submit the requested document, and upon ACEH approval, perform the proposed work, and send us the technical reports requested below.

#### **TECHNICAL COMMENTS**

1. **Determination of Hydraulic Properties.** The work plan, as presented, proposes to introduce the soil-wash surfactant into groundwater beneath the site and determine hydraulic properties of the groundwater-bearing formation afterward. ACEH requests that the formation hydraulic properties be determined prior to proposing a plan for surfactant introduction. Having determined the hydraulic properties, an evaluation of the well network is required to determine if the well network is adequate to both monitor the results and to insure capture of the released chemicals in addition to the introduced surfactant. Please prepare a work plan to address the hydraulic properties of formation, including the radius of influence

for any proposed infiltration wells. Discuss the methodology that will be implemented to demonstrate full capture of groundwater based on the variability of groundwater flow at the site. Selection of the pilot study infiltration well(s) should be based on several factors, including the determination of the formation properties and the ability to monitor desorbed chemicals and surfactant. Based on the direction of groundwater flow and injection well locations, it is anticipated that additional groundwater monitoring well(s) will be required to adequately monitor groundwater. Please submit your plan by the date specified below.

2. **Chemical Analyses.** Tertiary butyl alcohol (TBA) has been detected at the site. The analytical report for the most recent groundwater sampling event, conducted on June 6, 2012, documented TBA concentrations of up to 2,320 micrograms per liter. Please include TBA, diisopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), 1,2-dibromoethane, and 1,2-dichloroethane in the scope of analysis for the groundwater samples. Provide the laboratory analysis report(s) as an attachment.
3. **Groundwater Monitoring Schedule.** A review of historic groundwater monitoring results identified the highest groundwater level typically occurs in March. Please align your semiannual monitoring schedule to occur in the months of March and September. Note that semiannual groundwater monitoring should be used only for wells that have been sampled over a minimum of one hydrologic cycle (four consecutive quarters). New monitoring wells should be sampled quarterly for one year before a semiannual monitoring schedule is implemented for new wells.
4. **File Naming.** In order to facilitate report review ACEH has developed a standardized file naming convention. The convention allows for grouping of reports by type. The format includes the case file RO number (ROnnnn) and has a date suffix in the form of year-month-day (yyyy-mm-dd). The standardized file names are included with the technical report request.

### **TECHNICAL REPORT REQUEST**

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

- **November 6, 2012- Work Plan for a Surfactant Infiltration Pilot Study** (file name: ROnnnn\_WP\_R\_YYYY-mm-dd)
- **April 30, 2013- Groundwater Monitoring Report** (file name ROnnnn\_GWM\_R\_YYYY-mm-dd)
- **October 30, 2013- Groundwater Monitoring Report** (file name ROnnnn\_GWM\_R\_YYYY-mm-dd)

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. If you have any questions, please call me at (510) 567-6764 or send me an electronic mail message at keith.nowell@acgov.org.

Responsible Parties  
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Sincerely,

Keith Nowell, PG CHG  
Hazardous Materials Specialist

Attachment: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 2032 (*Sent via E-mail to: [lgriffin@oaklandnet.com](mailto:lgriffin@oaklandnet.com)*)  
Dennis Dettloff, Antea Group, 11050 White Rock Rd., Suite 110 Rancho Cordova, CA 95670 (*Sent via E-mail to: [ddettloff@anteagroup.com](mailto:ddettloff@anteagroup.com)*)

Donna Drogos, ACEH (*Sent via E-mail to: [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org)*)  
Keith Nowell, ACEH (*Sent via E-mail to: [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org)*)  
GeoTracker, eFile

# 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> July 20, 2010
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 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.