



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

June 5, 2008

Mr. Bill Borgh (Sent via electronic mail)  
76 Broadway  
Sacramento, CA 95818

Mr. Tony Banh and Monument Gas & Market  
10151 International Blvd.  
Oakland, CA 94603

Subject: Fuel Leak Case No. RO0002444 and Geotracker Global ID T0600173591, Unocal 7124,  
10151 International Boulevard, Oakland, CA

Dear Mr. Borgh:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the documents entitled, *Workplan for Additional Off-Site Well Installation*, dated October 14, 2005, *Addendum to Workplan for Additional Off-Site Monitoring Well Installation* dated July 22, 2005 and *Work Plan for Additional Site Assessment* dated May 21, 2008, which replaces the two former work plans. The newest work plan recommends installing five monitoring wells. We concur with the proposed locations presented in your new work plan. However, we recommend that you fully define the horizontal and vertical extent of the soil and groundwater plumes by performing depth discrete sampling before installing wells and advance one boring downgradient of the dispensers to define the vertical extent of petroleum hydrocarbons and oxygenates in soil and groundwater. Also, we recommend that you install a monitoring network that allows collection of depth discrete samples, as discussed below.

The proposed work scope may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated. We request that you provide an abbreviated work plan addendum that addresses our technical comments below.

#### **TECHNICAL COMMENTS**

1. **Lateral Soil and Groundwater Characterization.** Before installing permanent monitoring points, we recommend that you assess the lateral extent of the soil and groundwater plumes by advancing exploratory borings in your proposed boring locations. We request that soil samples be collected and analyzed at areas of obvious contamination, the soil/groundwater interface, at each lithology change, or at a minimum of five-foot intervals. We recommend that you obtain at least two soil samples that are below the detection limits to define the vertical extent of contamination in soil. We request that this boring be continuously cored to obtain lithologic information to locate your screen intervals and to add and update your previously submitted cross-sections.

Should you determine that you need to install downgradient monitoring wells after the initial part of your investigation, ACEH requests that you install depth discrete wells with a sand pack interval no longer than 2 to 5 feet. This may require that you install multiple wells or multichamber wells. Installing these depth discrete wells can help to define the plume depth and indicate which areas need remediation. Upon completing the borings and obtaining the analytical results, your proposed well construction depths, details and locations should be sent to ACEH for review. This can be completed by either including a work plan in the soil and water investigation (SWI) report requested below or submitted earlier with preliminary results for ACEH review.

2. **Vertical Soil and Groundwater Characterization.** Based on the results from the samples collected at depth hydraulically downgradient of the dispensers, hydrocarbons and oxygenates are present in the deepest soil samples. To investigate the vertical extent of the soil and groundwater plumes in this area, we request that you install a boring downgradient of the source area. We recommend that you obtain two clean soil samples at the bottom of each boring. Should you be unable to collect depth discrete soil samples, collecting a depth discrete groundwater sample that is below the detection limit should suffice. This may be completed by using a depth discrete sampling method such as dual-tube geoprobe, CPT or MIP. Please refer to the documents entitled American Petroleum Institute Publication No. 4699 dated February 2000; 'Expedited Site Assessment Tools for Underground Storage Tank Sites: A Guide for Regulators' (EPA 510-B-97-001), prepared by the U.S. Environmental Protection Agency (EPA), dated March 1997; and 'Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Appendix C,' prepared by the State Water Resources Control Board, dated March 27, 2000 for recommended investigation methods. Please submit your site map showing the added boring location(s) and your proposal for the depth and method of your planned depth discrete sampling in the work plan addendum requested below.
3. **Regional Geologic and Hydrogeologic Setting.** The regional and local geologic and hydrogeologic setting must be understood in order to begin preparing a site conceptual model (SCM). Please include a concise narrative discussion of the regional geologic and hydrogeologic setting. Include a list of technical references you reviewed and update your geologic cross-sections. Ensure that one is parallel and the other, perpendicular to the plume axis. Include a concise discussion of the on-site geology, hydrogeology, release history, source zone, plume development and migration, attenuation mechanisms, preferential pathways, and potential threat to down-gradient and above-ground receptors (e.g. contaminant fate and transport). Please include the contaminant volatilization from the subsurface to indoor/outdoor air exposure route (i.e. vapor pathway) in the analysis in the SWI report requested below.
4. **Preferential Pathway Evaluation Survey.** The purpose of the preferential pathway study is to locate potential migration pathways and conduits and determine the probability of the NAPL and/or plume encountering preferential pathways and conduits that could spread contamination. We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for vertical and lateral migration that may be present in the vicinity of the site.

Discuss your analysis and interpretation of the results of the preferential pathway study (including the detailed well survey and utility survey requested below) and report your results in the Soil and Water Investigation (SWI) requested below. The results of your study shall contain all information required by California Code of Regulations, Title 23, Division 3, Chapter 16, §2654(b).

a. Utility Survey

An evaluation of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s) is required as part of your study. Please include maps and cross-sections illustrating the location and depth of all utility lines and trenches within and near the site and plume areas(s) as part of your study.

b. Well Survey

The preferential pathway study includes a detailed well survey of all wells (monitoring and production wells: active, inactive, standby, decommissioned (sealed with concrete), abandoned (improperly decommissioned or lost); and dewatering, drainage, and cathodic protection wells) within a ¼ mile radius of the subject site. Your groundwater monitoring reports refer to a well survey that was performed for the site. ACEH files do not contain this report. Please upload this report to the ACEH ftp site for our review.

5. **Quarterly Monitoring Report Figures.** Please update the quarterly monitoring reports that were denied in Geotracker, as per previous e-mail notification. The North arrow has shifted on the maps from the July 2007 quarterly reports to present. Please resubmit the documents that were denied with the corrected figures and text relating to the groundwater flow direction and submit updated maps for the remaining reports that were not rejected. Include rose diagrams for depicting groundwater gradients. Plot the rose diagram on the groundwater contour maps and update it in all future reports submitted for your site. Please ensure that the updated gradient directions are included on the rose diagram along with all historical gradients. The report figure shows the cross street as 102nd Street. In future reports please have these changed to 102nd Avenue.

### **TECHNICAL REPORT REQUEST**

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

- **July 10, 2008** – Work plan addendum - Abbreviated work plan addendum with new proposed boring location map and a letter stating planned discrete sampling method, revised quarterly monitoring reports with correct north arrow and new maps of remaining quarterly monitoring reports with incorrect north arrow.

- **September 15, 2008** – Complete the field work.
- **October 31, 2008** – Submit SWI report and monitoring well installation work plan, if not previously submitted.

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.swrcb.ca.gov/ust/electronic\\_submittal/report\\_rqmts.shtml](http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml)).

#### 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,

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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.

If you have any questions, please call me at (510) 639-1287 or send me an electronic mail message at [barbara.jakub@acgov.org](mailto:barbara.jakub@acgov.org).

Sincerely,

A handwritten signature in blue ink that reads "Barbara Jakub". The signature is written in a cursive style with a long horizontal stroke at the end.

Barbara Jakub, California P.G.  
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Ben Chevlen, Secor International, Inc., 3017 Kilgore Rd., Rancho Cordova, CA 95670 (sent via electronic mail)

Leroy Griffin, sent via electronic mail [lgriffin@oaklandnet.com](mailto:lgriffin@oaklandnet.com)

Donna Drogos, ACEH, via electronic e-mail  
Barbara Jakub, ACEH  
File

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

Effective **January 31, 2006**, 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](mailto:dehloptoxic@acgov.org)  
or
    - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
  - 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 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](mailto: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 at acgov.org. (e.g., [firstname.lastname@acgov.org](mailto: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)