

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) 337-9335

February 6, 2008

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

Mr. Clarence Gasper  
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

Dear Mr. Gillis and Mr. Gasper:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the most recently submitted document entitled, "Work Plan for Additional Site Characterization," dated July 17, 2007. The Work Plan proposes a scope of work that includes direct push soil borings to delineate soil contamination in the area of the former waste oil tank and dispensers, excavation and confirmation sampling in the areas of the waste oil tank and dispensers, and limited groundwater extraction from the excavations. Based upon our review, we have several comments that require limited revisions to the work plan. Therefore, we request that you prepare a Revised Work Plan that addresses the technical comments below.

**TECHNICAL COMMENTS**

1. **Environmental History, Preferential Pathway Survey, Historical Research, and Site Conceptual Model.** The information included in the Environmental History, Preferential Pathway Survey, and Site Conceptual Model sections of the Work Plan was useful in providing background for review of the fuel leak case and work plan. These sections were generally well written and complete.
2. **Proposed Boring Locations.** In concept, we have no objection to advancing soil borings to determine the lateral extent of contamination prior to excavation. However, several of the proposed soil borings appear to be less than five feet from previous soil borings. Given the observation of free-phase product over an approximately two-foot interval in boring SB-2, the extent of contamination near the southern dispenser may be greater than the proposed area shown on Figure 13 of the Work Plan. We recommend that you locate proposed borings SB-5 through SB-8 greater distances from boring SB-2 in order to increase the potential to adequately define lateral extent prior to excavation. Please present the revised boring locations in the Revised Work Plan requested below.

3. **Vertical Extent of Contamination.** The highest concentration of fuel hydrocarbons detected in soil samples from soil boring SB-2 was reported in the lowermost soil sample collected at 10 feet bgs. We request that one of the proposed soil borings in the area of SB-2 be advanced to a depth of approximately 25 feet to investigate the vertical extent of soil and groundwater contamination. Please include plans in the Revised Work Plan requested below to extend one of the proposed soil borings near the southern end of the dispensers in order to collect soil and depth-discrete groundwater samples for vertical delineation of soil and groundwater contamination.
4. **Previous Piping Removal.** In the Revised Work Plan requested below, please clarify whether the product piping that extends from the northern to the southern end of the former dispenser island was removed in 2006. We note that the product piping appears to be located beneath column supports on Figure 3 of the Work Plan.
5. **Monitoring Wells.** In order to confirm the hydraulic gradient at the site and evaluate the effectiveness of the proposed excavations in removing the source of groundwater contamination in the area of SB-2, we request that you install three monitoring wells at the site following the excavations. We recommend that one monitoring well be located immediately northwest of the southern end of the dispensers, one monitoring well be located northwest of the office building to assess plume extent, and one monitoring well be located in the area of the former USTs. Please include plans for monitoring well installation and sampling in the Revised Work Plan requested below.
6. **Proposed Laboratory Analyses.** In addition to the proposed analytes, we request that you analyze the soil samples to be collected from proposed borings SB-11 through SB-14 in the area of the former waste oil tank for lead using EPA Method 6010.

#### **TECHNICAL REPORT REQUEST**

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

- **Revised Work Plan** – April 10, 2008

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**

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight

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Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

#### 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

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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) 567-6791 or send me an electronic mail message at [jerry.wickham@acgov.org](mailto: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: Brent Wheeler, Golden Gate Tank Removal, 3730 Mission Street, San Francisco, CA 94110

Donna Drogos, ACEH  
Jerry Wickham, 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)