



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

June 3, 2011

Mr. Ron Mooney
California Syrup & Extract
PO Box 8305
Emeryville, CA 94608

Subject: Request for Work Plan; Fuel Leak Case No. RO0000046 and Geotracker, Global ID # T0600101623, California Syrup & Extract, 1355 55th Street, Emeryville, CA 94508

Dear Mr. Mooney:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *First Semi-Annual 2010 Groundwater Monitoring Report*, dated July 7, 2010, and the *Second 2010 Semi-Annual Groundwater Monitoring Report*, dated November 9, 2010. The reports were prepared and submitted on your behalf by Gribi Associates, Inc (Gribi). Thank you for undertaking the work and submitting the reports; they further the understanding of environmental conditions encountered in groundwater beneath the site.

Eight USTs were abandoned in-place in 1993 due to the proximity of the footings for a building constructed of brick. The USTs are reported to have previously included one gasoline UST, two diesel USTs, one fuel oil or waste oil UST, one ammonia UST, and three denatured alcohol USTs. Sixteen soil bores were installed as a part of the abandonment in-place activities (July 1993), while two groundwater monitoring wells were subsequently installed in September 1994. Concentrations up to 650 mg/kg TPHg, 250 mg/kg TPHd, 110 mg/kg TPHmo, 1.2 mg/kg benzene, 3.4 mg/kg toluene, 11 mg/kg ethylbenzene, and 16 mg/kg total xylenes were detected in soil (MW-2.1). Additionally, up to 230 mg/kg ammonia was detected, while TPH as alcohol was not detected in soil around the ammonia and alcohol USTs respectively. Based on the depth of collection, the majority of the soil samples appear to have been collected in an attempt to vertically define hydrocarbon contamination at or below the level of groundwater; field evidence of hydrocarbon contamination above groundwater while collected, does not appear to have been consistently collected for characterization by laboratory analysis.

Excluding exceptionally (and unusually) elevated groundwater analytical concentrations collected in September 2009 during the first sampling event in a number of years, groundwater concentrations up to 10,000 ug/l TPHg, 630 µg/l TPHd, <100 µg/l TPHmo, 590 µg/l benzene, 370 µg/l toluene, 250 µg/l ethylbenzene, and 640 µg/l total xylenes, and 120 µg/l MTBE have been detected beneath the site. During the unusual September 2009 sampling event, concentrations up to 59,000 µg/l TPHg, 8,100 µg/l TPHd, 2,900 µg/l TPHmo were detected (in addition to lower concentrations of BTEX and MTBE than referenced above).

Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below.

TECHNICAL COMMENTS

- 1. Request for Subsurface Work Plan** – Existing soil and groundwater analytical data indicate that releases of petroleum hydrocarbons and ammonia have occurred at the site. Field evidence of releases also indicates releases have occurred; however, the downgradient and lateral extent of contamination in both soil and groundwater has not been defined. At present only two wells have been installed at the site and offsite wells do not appear to be used to help define the groundwater flow direction or gradient. This is an outstanding request from the March 7, 2007 directive letter from ACEH.

At present existing wells are oriented roughly in an east – west orientation along 55th Street; however, this flow direction is not confirmed at the site. The detection of ammonia in soil collected in four soil bores (IB-2, IB-3, IB-9, and IB-10) southwest of the former ammonia UST (*Report of Soil Investigation*, dated September 30, 1999) can suggest a southwesterly groundwater flow direction, or conversely can indicate ammonia use elsewhere on the site; however, this has not been explored or excluded. As a consequence, ACEH requests submittal of a work plan to undertake the lateral, downgradient, and vertical delineation of all chemicals of concern at the site, in both soil and groundwater, by the date identified below.

2. **Request for Information** – The *Report of Ground Water Investigation*, dated October 25, 1994, references and depicts a third “pre-existing” on-site groundwater monitoring well, labeled MW-3, located roughly 60 feet south of 55th Street. The well was surveyed; however, does not appear to have been sampled or reported for laboratory analysis, nor for depth to groundwater measurements. As a consequence, ACEH requests further information on this well, including construction details and installation date by the date identified below.
3. **Denatured Alcohol USTs** – As previously noted three denatured alcohol holding USTs were abandoned in-place at the site. It is reported that denatured alcohol can contain a number of additives, including acetone, methyl ethyl ketone (MEK) and methyl isobutyl ketone (MIK). Analytical data for soil appears to indicate a release of alcohol or these additives has not impacted soil beneath the site; however, groundwater data does not appear to have been collected. Because the bottoms of these three USTs appear to have been at or below the level of groundwater, soil may not necessarily be impacted. As a consequence, ACEH requests inclusion of these analytes in the analytical suite for groundwater collected at the site during the above requested investigation (However, this request is not meant to exclude additional soil analysis for alcohol or the additives). Based on the subsequent analytical results ACEH additionally requests an evaluation of the appropriateness of the continued collection of these analytes.
4. **Ammonia UST** – As previously noted, one ammonia UST was abandoned in-place at the site and detectable concentrations of ammonia were found in soil; however, ammonia, and related degradation products in the groundwater environment have not been investigated at the site. Additionally ammonia concentrations were present in soil in the southwestern portion of the site as noted above in Technical Comment 1. ACEH requests inclusion of ammonia and its degradation products in the analytical suite for groundwater and soil collected at the site during the above requested investigation. Based on the subsequent analytical results ACEH additionally requests an evaluation of the appropriateness of the continued collection of these analytes.
5. **Compliance With GeoTracker and ACEH Website Uploads** – The site is not in compliance with Geotracker upload requirements. At a minimum, historic bore and well logs, a GEO_MAP, and a well survey to Geotracker standards for uploading have not been provided. Additionally, to date, the *First Semi-Annual Groundwater Monitoring Report of 2011* has not been uploaded to the ACEH ftp website. Please upload these documents by the date identified below. Please also ensure all recent reports have been uploaded to both websites.
6. **Request for Information** – In conjunction with the uploads referenced above, ACEH additionally requests the submittal of electronic copies of all other reports, data, and correspondence related to all environmental investigations for this property (including Phase I reports). The ACEH case file for the subject site contains only the electronic files listed on our website; please access the website as described further in the attachments below. Because of the age of the project, ACEH is aware that additional work may have occurred which may not have been previously provided. You are requested to submit copies of all relevant environmental investigation documents by the date identified below.

TECHNICAL REPORT REQUEST

Please submit the following deliverable(s) to ACEH (Attention: Mark Detterman), according to the following schedule:

- **July 15, 2011** – Geotracker and FTP uploads
- **August 5, 2011** – Work Plan for Subsurface Investigation (with well survey upload)

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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.

Should you have any questions, please contact 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: James Gribi, Gribi Associates, 1090 Adams Street, Suite K, Benicia, CA 94510
(sent via electronic mail to: JGribi@gribiassociates.com)

Donna Drogos, ACEH, (sent via electronic mail to donna.drogos@acgov.org)
Mark Detterman, ACEH, (sent via electronic mail to mark.detterman@acgov.org)
Geotracker, Electronic File

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/).

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
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

- **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) 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 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.