



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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September 8, 2016

Hollis Phillips
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100 Montgomery, Suite 300
San Francisco, CA 94104
(Sent via email to: Hollis.Phillips@arcadis-us.com)

Jim Smith
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201 Helios Way, Sixth Floor
Houston, TX, 77079
(Sent via email to: Jim.Smith2@bp.com)

Raj Mulkh & Bhatia Kulwinder, et. al.
Address Unknown

Vintners Distributors, Inc
Address Unknown

Alazani Abdulrahim
27081 Call Avenue
Hayward, CA 94542

Subject: Modified Work Plan Approval; Fuel Leak Case No. RO0000076 and GeoTracker Global ID T0600100110, ARCO #04931, 731 W Macarthur Blvd, Oakland, CA 94609

Dear Responsible Parties:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *Site Investigation Work Plan*, dated July 25, 2016. The work plan was prepared and submitted by ARCADIS, U.S., Inc. (ARCADIS). The work plan proposed the installation of three soil bores along the eastern property line in the vicinity of the former underground storage tanks (USTs), the collection of up to three soil samples per bore, the collection of a grab groundwater sample from each soil bore, and the resampling of vapor well SV-8 for Total Petroleum Hydrocarbons as gasoline (TPHg) vapor concentrations.

Based on ACDEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. Work Plan Modifications – The referenced work plan proposes a series of actions with which ACDEH is in general agreement of undertaking; however, ACDEH requests several modifications to the approach. The intent of the modifications is to allow the collection of sufficient data, and to generate multiple lines of evidence in one mobilization, to determine if the site should be closed under the Low Threat Closure Policy (LTCP). The modifications are also generally consistent with recent State Water Board reviews of the case file. Please submit a report by the date specified below.

a. Additional Soil Bore and Analysis – In order to determine the potential for vapor intrusion to affect the garage buildings to the south of the residence of concern, it appears reasonable to install an additional soil bore to groundwater, as planned and described for the three proposed soil bores, in the vicinity of sidewall sample SW6. At the time it was collected, this sample documented higher residual soil concentrations than other sidewall samples collected in the vicinity. ACDEH recognizes soil contaminant concentrations are likely to have undergone a reduction, but the data is intended to facilitate an understanding of the magnitude of the change and the risk of vapor intrusion. As planned at other bore locations, the collection of soil in the 0 to

5 and 5 to 10 foot intervals is appropriate, and analysis should include TPHg and benzene, toluene, ethylbenzene, total xylenes, (BTEX) and naphthalene. As discussed, determining the depth of first encountered groundwater in each of the soil bores is important in helping to determine the appropriateness of case closure at the site.

- b. Additional Soil Vapor Well** – In order to determine the potential for vapor intrusion to the residential house with a partial basement at 721 West MacArthur Boulevard, it is appropriate to install a minimum of one additional vapor well to a depth of five feet below the basement foundation in close proximity to the basement location, consistent with the LTCP. This may be as deep as 10 to 11 feet below grade surface (bgs), depending on foundation construction. The depth to groundwater, which will be determined with the installation of the soil bores, is anticipated to help determine the depth of installation for the vapor well.
 - c. Contingency Vapor Well** – In order to potentially limit mobilizations and report generation, if the analytical results from soil samples in the 0 to 5 and the 5 to 10 foot depth interval adjacent to the garage units do not indicate it is appropriate to close the case under the LTCP, the installation of an additional vapor well adjacent to the garage locations (e.g. SW6) will provide additional data for evaluation. Therefore, it may be appropriate to evaluate the need for an additional contingency vapor well during the site investigation.
 - d. Vapor Temporal Changes** – The referenced work plan proposed the resampling of vapor well SV-8 for TPHg only. Consistent with Department of Toxic Substances Control (DTSC) guidance, in addition to the sampling of the new soil vapor well, ACDEH requests the resampling of SV-7 and SV-8 in order to understand vapor concentration variations with time at the site.
 - e. Vapor Analytical Suite** – Consistent with the previous comment, please analyze the three vapor well locations for full suite volatile organic compounds by TO-15 or EPA 8260. Additionally, as previously requested, due to the selective absorption of naphthalene to vapor sample tubing, please additionally analyze naphthalene by TO-17. Analysis for oxygen, carbon dioxide, methane, and the tracer is also requested. Should the tracer gas be detected in the vapor sample, please additionally analyze the shroud atmosphere for the tracer, in conformance with DTSC leak acceptability guidance (5% leak).
- 2. Groundwater Monitoring** – Please continue to conduct groundwater monitoring annually in August of a given year to capture worst case groundwater concentrations. Please include all wells, and submit a report by the date identified below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below, according to the following schedule:

- **November 18, 2016 – Site Investigation**
File to be named: SWI_R_yyyy-mm-dd
- **October 31, 2016 - 2016 Annual Groundwater Monitoring Event**
File to be named: GWM_R_yyyy-mm-dd

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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address does not appear on the cover page of this notification, ACDEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Ladies & Gentlemen
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Thank you for your cooperation. ACDEH looks forward to working with you and your consultants to advance the case toward closure. If you have any questions, please call 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: Dilan Roe, ACDEH, (Sent via electronic mail to: dilan.roe@acgov.org)
Mark Detterman, ACDEH, (Sent via electronic mail to: mark.detterman@acgov.org)
Electronic File, GeoTracker

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/).

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: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 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.