

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION
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November 7, 2007

William and Renee Sheehan
1236 Bay Street
Alameda, CA 94501

Subject: Fuel Leak Case No. RO000081 (Global ID #T0600102127), Sheehan Property, 845 Pacific Avenue, Alameda CA

Dear Mr. Sheehan:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site, including the recently submitted reports entitled, "Additional Site Investigation" dated December 5, 2002 and "Tank Removal Report" dated September 1997. The "Tank Removal Report," describes the removal of one 750-gallon UST and one 120 gallon UST. During the tank removal, up to 800 parts per million (ppm) total petroleum hydrocarbon as diesel (TPHd) and 3.6 ppm benzene were detected beneath the former UST. Confirmation soil sampling detected dissolved phase TPHd at up to 430,000 parts per billion (ppb), with an oil sheen observed in soil samples collected below the water table. A subsequent soil and groundwater investigation conducted in 2002 detected high concentrations of TPHd in soil at up to 28,300 ppm and dissolved phase TPHd at concentrations of up to 4,490 ppb in groundwater.

ACEH requests that additional groundwater monitoring and sampling be completed at the site. Our request is based on the conclusion that the most recent groundwater monitoring data available in our files dates back to 2003. Furthermore, additional groundwater analytical data for dissolved phase petroleum hydrocarbon will provide an improved understanding of petroleum hydrocarbon contamination onsite and immediately downgradient of the site.

In the interest of moving your site through the regulatory review process, ACEH offer the following observations in the Technical Comments below. Based on ACEH staff review of the case file, we request that you address the following technical comments and prepare a work plan detailing work to be performed, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to steven.plunkett@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Monitoring Well Rehabilitation and Redevelopment.** ACEH requests that prior to monitoring well sampling, all onsite monitoring wells should be rehabilitated and/or redeveloped; thus allowing the collection of a representative sample of formation groundwater. Note that well redevelopment may require additional well volumes to be removed to assure that water quality parameters are satisfied. Please describe and present the results of the well redevelopment and rehabilitation activities in the report requested below.

2. **Residual Soil Contamination.** In 2002, soil sampling conducted on site detected up to 28,000 ppm TPHd. Furthermore, soil sampling conducted at 11 feet bgs detected 14,600 ppm TPHd indicating that the vertical extent of contamination beneath your site is undefined. Residual pollution remains on site in the area of the former heating oil tank, which was removed in 1996. Based on these conditions, further investigation and cleanup is required for this site. Therefore, ACEH requests that you submit a Work Plan to conduct further site characterization to define the lateral and vertical extent of soil and groundwater contamination. Please propose soil and groundwater sampling locations both on-site and off-site to define the extent of contamination. You may also submit a proposed scope of work in the Work Plan to continue excavation to remove contaminated soil with collection of confirmation soil samples to help define the extent of soil contamination.
3. **Groundwater Sampling.** Groundwater monitoring has not been conducted at the site since 2003. Please sample the following monitoring wells in order to determine current groundwater conditions throughout the site: MW-1, MW-2, and MW-3. The water samples are to be analyzed for TPHg and TPHd by EPA Method 8015M or 8260, BTEX, EDB, EDC, MtBE, TAME, ETBE, DIPE, TBA and EtOH by EPA Method 8260 and total lead.

If current groundwater quality data indicate that elevated concentrations of petroleum hydrocarbons exist, further monitoring and investigation may be warranted. Please present the results from groundwater monitoring and sampling in the report requested below.

4. **Geotracker EDF Submittals** - A review of the case file and the State Water Resources Control Board's (SWRCB) Geotracker website indicate that electronic copies of analytical data have not been submitted for your site. Pursuant to CCR Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload all analytical data (collected on or after September 1, 2001), to the SWRCB's Geotracker database website in accordance with the above-cited regulation.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Steven Plunkett), according to the following schedule:

- **December 15, 2007** – Monitoring Well Redevelopment and Groundwater Sampling Report
- **January 1, 2008** – Work Plan

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 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).

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.

Mr. William Sheehan
November 6, 2007
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UNDERGROUND STORAGE TANK CLEANUP FUND

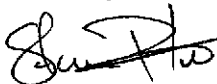
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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) 383-1767.

Sincerely,



Steven Plunkett
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Trdib Guha
AARS
2380 Salvio Street, Suite202
Concord, CA 94520-2137

Donna Drogos, ACEH
Steven Plunkett, ACEH
File