

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION
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Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

January 10, 2008

Ms. Farah Naz c/o
Mr. Muhammad Jamil
40092 Davis Street
Fremont, CA 94538

Subject: Fuel Leak Case No. RO0000096 and Geotracker Global ID T0600143649, Eagle Gas,
4301 San Leandro Street, Oakland, CA

Dear Ms. Naz:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted document entitled, "2007 Soil and Groundwater Investigation Report," dated December 5, 2007. The 2007 Soil and Groundwater Investigation Report presents the results from both on-site and off-site soil borings and monitoring wells. Results from the off-site soil borings indicate that petroleum hydrocarbons and fuel oxygenates are present at elevated concentrations in soil, soil vapor, and groundwater on site. The extent of off-site contamination has not been determined but elevated concentrations of petroleum hydrocarbons and fuel oxygenates were detected south and southwest of the site at sampling locations as much as approximately 275 feet from the site. The 2007 Soil and Groundwater Investigation Report also includes recommendations for additional work.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

- 1. Proposed Passive Soil Vapor Sampling (Gore Sorber®) Survey.** We have no objection to using a passive soil vapor sampling survey to help locate future off-site soil borings and monitoring wells. We have no comments on the proposed sampling locations at this time. Please submit a Work Plan for the passive soil vapor sampling survey that describes the sampling and analytical parameters for the survey. Please present this information in the Work Plan requested below.
- 2. Additional Soil Vapor Sampling and Wells.** Based on results from sampling of the shallow soil vapor probes, additional soil vapor sampling or installation of additional soil vapor probes is not requested at this time.
- 3. Off-site and Deep Monitoring Wells.** We concur with the recommendation to install off-site groundwater monitoring wells following review of the passive soil vapor sampling results. Although the locations of the off-site wells may be adjusted based on the results of the passive soil vapor sampling survey, the proposed depths and construction details of the wells are to be presented in the Work Plan requested below.

4. **Groundwater Monitoring Program.** We have no objection to a proposal to conserve costs in the groundwater monitoring program. In order to conserve costs, please discontinue analyses for monitored natural attenuation parameters during quarterly sampling. In the Work Plan requested below, please submit a proposal for future groundwater monitoring.
5. **Dual-Phase Extraction Pilot Test.** We concur that the proposal to install one extraction well and three observation wells for the proposed dual-phase extraction (DPE) pilot test. The proposed extraction and observation well locations shown on Figure 37 of the 2007 Soil and Groundwater Investigation Report appear to be acceptable. However, it is not clear why the screen intervals for the wells are proposed as shallow as 3.5 feet bgs since the largest mass of contamination appears to be deeper than 3.5 feet bgs. Moving the top of the screen lower may focus the vapor extraction within more contaminated intervals and potentially prevent surface infiltration. Please provide further definition and rationale for the proposed construction of the DPE extraction and observation wells in the Work Plan requested below. Please also provide further details on the duration, operation, and monitoring of the proposed DPE pilot test in the Work Plan requested below.
6. **Sewer System Leaks.** As discussed in Appendix H of the 2007 Soil and Groundwater Investigation Report, two leaks were found in the sewer line from the station building. Please report on progress in repairing the leaks in the Work Plan requested below.

TECHNICAL REPORT REQUEST

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

- **March 21, 2008** – Work Plan
- **45 days after the end of each quarter** – Quarterly Groundwater Monitoring Report

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.

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.

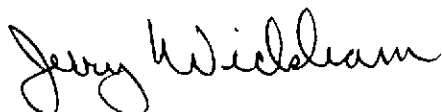
AGENCY OVERSIGHT

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.

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If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,

A handwritten signature in black ink that reads "Jerry Wickham". The signature is written in a cursive, flowing style.

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Robert Nelson
Clearwater Group
229 Tewksbury Avenue
Point Richmond, CA 94801

Donna Drogos, ACEH
Jerry Wickham, ACEH
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