

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL PROTECTION
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June 26, 2008

Mr. Pritpaul Sappal
2718 Washburn Court
Vallejo, CA 94591

Subject: Fuel Leak Case RO0000127, GeoTracker Global ID T0600101804, Alaska Gas Station,
6211 San Pablo Ave., Oakland, CA 94608

Dear Mr. Sappal:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted documents entitled, "Site Conceptual Model," dated May 27, 2008, the "Additional Investigation Workplan," also dated May 27, 2008, and the "Addendum to Site Conceptual Model," dated June 18, 2008, which were prepared by HerSchy Environmental, Inc. (HerSchy) for the subject site. HerSchy proposes to install four on-site borings to vertically delineate the extent of hydrocarbon contamination in soil and groundwater, thirteen off-site borings to delineate the lateral extent of soil and groundwater impact, and three permanent soil vapor wells on-site.

Additional clarification for the proposed scope of work appears necessary to adequately review the SCM and work plan. Therefore, ACEH cannot approve the scope of work at this time and requests that you address the following technical comments and send us the revised Site Conceptual Model (SCM) and work plan requested below.

TECHNICAL COMMENTS

1. **Soil and Groundwater Characterization** – HerSchy proposes to collect soil samples at five foot intervals and at the capillary fringe in the Additional Investigation Work Plan. In addition to the proposed soil sampling protocol, please collect soil samples at distinct changes in lithology and at obvious indications of hydrocarbon contamination (i.e. high Photo Ionization Detector [PID] measurements, odors, staining, etc.). Please include a discussion and submit a revised work plan by the date specified below.
2. **Preferential Pathway Evaluation in the SCM** – HerSchy presented a utility survey in Section 2.6.1 of the Site Conceptual Model (SCM). In Figure 2 of the SCM, HerSchy identifies water lines at a depth of 2.5 to 3.5 feet below the ground surface (bgs), natural gas lines at 3.5 to 4.5 bgs, and sewer lines at 5.5 to 6.5 feet bgs. However, a discussion on whether groundwater intersects these utilities and is acting as preferential pathways at the site was not included. A table with depth to groundwater data was not found in the SCM. A

review of the most recent quarterly groundwater monitoring report indicates that depth to groundwater has been measured historically as shallow as 4 feet bgs. Therefore, the utility corridors may be acting as preferential pathways for groundwater and potentially vapor migration. Please note that the intent of the preferential pathway study is to locate potential migration pathways and conduits and determine the probability of the NAPL and/or plume encountering preferential pathways and conduits that could spread contamination.

Based on a review of the proposed boring locations presented in the Additional Investigation Work Plan, it is not clear whether these proposed boring locations will aid in determining preferential migration in conjunction with plume delineation. Please include a thorough discussion on whether preferential migration is occurring at the site, include figures that illustrate proposed boring locations as well as utilities found at the site, and submit a revised SCM and work plan that addresses the above-mentioned concerns by the date specified below.

- 3. Groundwater Designation in the SCM** – In Section 2.7 of the SCM, HerSchy states that “[b]ased on a review of the GeoTracker™ database, it appears that impacted water is designated as ‘other groundwater (not used as drinking water).’” According to the San Francisco Bay RWQCB’s Water Quality Control Plan (Basin Plan) for the San Francisco Bay Basin, “the term ‘groundwater’ includes all subsurface waters, whether or not these waters meet the classic definition of an aquifer or occur within identified groundwater basins.” It is also stated in the Basin Plan that “all groundwaters are considered suitable, or potentially suitable, for municipal or domestic water supply (MUN).” Therefore, the groundwater beneath the subject site must be considered beneficial for these uses unless shown to be non-beneficial using criteria presented in the Basin Plan (i.e. less than 200 gallons per day yield or total dissolved solids exceeding 3,000 mg/L).

It is also stated in the Basin Plan that “[a]t a minimum, groundwaters designated for use as domestic or municipal supply shall not contain concentrations in excess of the secondary maximum contaminant levels (Secondary MCLs) specified in Tables 64449-A (Secondary MCLs-Consumer Acceptance Limits) and 64449-B (Secondary MCLs-Ranges) of Section 64449 of Title 22 of the California Code of Regulations, which is incorporated by reference into this plan.” Currently, concentrations of contaminants in groundwater are significantly above RWQCB’s ESLs as well as the secondary MCLs. Please note that site-specific cleanup goals above the secondary MCLs and ESLs may be acceptable provided that they are adequately justified based on site conditions. Please submit a revised SCM and work plan that addresses the above-mentioned concerns by the date specified below.

- 4. Soil Vapor Sampling** – In the Additional Investigation Work Plan, HerSchy proposes to install three permanent vapor wells to depths of 3 to 5 feet bgs at the site. However, the well construction details were unclear and a figure illustrating well construction was not included. In addition, HerSchy proposes to place a tracer compound in a dish and enclose the sampling equipment including the dish with plastic sheeting. It is not clear how the plastic sheeting will be secured to the ground and a discussion of how the tracer atmosphere with the plastic sheeting will be measured and maintained was not included. It is recommended that the soil vapor wells with the sampling device and all fittings are placed under a shroud with pliable weather-stripping along its base to maintain a tracer gas atmosphere. The shroud should ensure that there is tracer gas around all sampling connections. The shroud should have a port for inserting a monitoring and sampling device (e.g. PID) to ensure that

tracer gas atmosphere is maintained. Please submit a revised work plan that addresses the above-mentioned concerns by the date specified below. The work plan may be included in the revised SCM.

TECHNICAL REPORT REQUEST

Please submit the Site Conceptual Model, Work Plan, and technical reports to Alameda County Environmental Health (Attention: Paresh Khatri), according to the following schedule:

- **August 25, 2008** – Revised Site Conceptual Model and Work Plan
- **October 30, 2008** – Quarterly Monitoring Report (Third Quarter 2008)
- **January 30, 2009** – Quarterly Monitoring Report (Fourth Quarter 2008)
- **April 30, 2009** – Quarterly Monitoring Report (First Quarter 2009)
- **July 30, 2009** – Quarterly Monitoring Report (Second Quarter 2009)

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.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml).

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

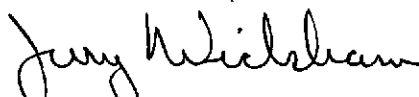
If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 777-2478 or send me an electronic mail message at paresh.khatri@acgov.org.

Sincerely,



Paresh C. Khatri
Hazardous Materials Specialist



Jerry Wickham, PG, CHG, CEG
Acting Supervising Hazardous Material Specialist

Mr. Sappal
RO0000127
June 26, 2008, Page 5

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Scott Jackson, HerSchy Environmental, Inc., P.O. Box 229, Bass Lake, CA 93604-0229
David Reinsma, Trinity Source Group, Inc., 500 Chestnut Street, Suite 225, Santa Cruz, CA
95060
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland,
CA 94612-2032
Donna Drogos, ACEH
Paresh Khatri, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: 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
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 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)
- c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload)