

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



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

May 8, 2008

Ms. Ann Marie Holland Tiers  
Estate of Jack Holland  
1498 Hamrick Lane  
Hayward, CA 94544

Ms. Barbara Holland  
P.O. Box 5  
Kentfield, CA 94914

Subject: Fuel Leak Case No. RO0000212 and Geotracker Global ID T0600100709, Holland Oil, 16301 East 14<sup>th</sup> Street, San Leandro, CA

Dear Ms. Tiers and Ms. Holland:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site including the document entitled, "*Phase II Environmental Site Assessment, 16301 East 14<sup>th</sup> Street, San Leandro, California,*" dated January 25, 2008. The Phase II report was prepared on behalf of the Hayward Area Recreation District by Ninyo & Moore. Ninyo & Moore conducted soil and groundwater sampling at the site in support of a redevelopment assessment. The scope of work conducted for the redevelopment assessment completes a portion of the phased investigation previously proposed by Clearwater Group in work plans and work plan addenda dated March 3, 2003, May 5, 2006, December 5, 2006, and February 2, 2007. However, several tasks that were proposed in the above referenced work plans and work plan addenda have not been completed. The technical comments below discuss several issues that were not addressed by the soil and groundwater sampling results presented in the "*Phase II Environmental Site Assessment, 16301 East 14<sup>th</sup> Street, San Leandro, California,*" dated January 25, 2008. We request that you prepare a Response to Comments and Work Plan that addresses the technical comments below.

**REQUEST FOR INFORMATION**

The ACEH case file for this site can be viewed online at the following website: <http://ehgis.acgov.org/dehpublic/dehpublic.jsp>. Please review the list of reports in the case file. We request that you submit a copy of any other reports available to you that are not listed in the case file and that document investigation activities or other environmental work related to this site, including any Phase I or Phase II investigation reports completed as part of a potential property transfer.

### **TECHNICAL COMMENTS**

1. **Assessment of Off-site Groundwater Contamination.** A transect of direct push borings was previously proposed near the western property boundary to assess the extent of soil contamination near the western boundary and to assess potential groundwater contamination moving off-site. We request that you review existing site data along with results from the 2007 Phase II Environmental Assessment and propose additional investigation as necessary to complete characterization of the off-site groundwater contamination. Please present your plans in the Response to Comments and Work Plan requested below.
2. **Vertical Delineation.** The "Workplan Addendum," dated June 5, 2006 proposed vertical delineation using three soil borings extended to a depth of 40 feet bgs. Soil conductivity logging and depth discrete groundwater sampling was proposed for the three borings. Please also review the technical comment regarding vertical delineation in our correspondence dated October 28, 2005 (attached). We request that you include plans to complete delineation of the vertical extent of contamination in the Response to Comments and Work Plan requested below.
3. **PAHs and PCBs in Soil.** Polychlorinated biphenyls (PCBs) and polycyclic aromatic hydrocarbons (PAHs) have been detected in wastes and/or soil at the site. Although groundwater samples were analyzed for PAHs during the Phase II Environmental Site Assessment conducted in July and August 2007, no PAH analyses appear to have been conducted for soils. No PCB analyses appear to have been performed for soil and or groundwater during the Phase II Environmental Site Assessment. We request that you present plans in the Response to Comments and Work Plan requested below to characterize the extent of PAHs and PCBs in soil.
4. **Drums on Site.** A number of 55-gallon drums with unknown contents were observed between the warehouse and perimeter fencing. Please provide documentation to confirm that all drums and their contents have been removed and appropriately disposed off-site.
5. **Surface Soil Contamination in Area of B-2 and B-7.** Elevated concentrations of total petroleum hydrocarbons as diesel and kerosene were detected in soil samples collected from depths of 2 feet bgs in soil borings B-2 and B-7, which are located in the eastern portion of the site. The horizontal extent of contamination in this area has not been determined. In the Response to Comments and Work Plan requested below, please include plans to define the extent of contamination in this area.
6. **Potential Vapor Intrusion.** The potential for vapor intrusion to indoor air for potential future receptors has not been evaluated for the site. Please describe in the Response to Comments and Work Plan requested below, how potential vapor intrusion for future receptors will be evaluated.
7. **Groundwater Monitoring.** Quarterly groundwater monitoring is to be implemented for the site. Please include plans for quarterly groundwater sampling in the Response to Comments and Work Plan requested below.

### TECHNICAL REPORT REQUEST

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

- **July 28, 2008** – Response to Comments and 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

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/cleanup/electronic\\_reporting](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,

Ms. Ann Marie Holland Tiers and Ms. Barbara Holland  
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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) 567-6791 or send me an electronic mail message at [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org).

Sincerely,



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

Attachment: ACEH Correspondence dated October 28, 2005

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Larry Lepore, Hayward Area Recreation Department, 1099 E street, Hayward 94541

Sonia Urzua, Alameda County Community Development Agency, 224 West Winton Avenue,  
Hayward, CA 94544

Edward Martins, Law Offices of Edward Martins, 1164 A Street, Hayward, CA 94541

Hal Reiland, Reiland and Reiland, P.O. Box 5490, Pleasanton, CA 94566

Kris Larson, Ninyo & Moore, 1956 Webster Street, Suite 400, Oakland, CA 94612

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

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October 28, 2005

Ms. Ann Marie Holland Tiers  
Estate of Jack Holland  
1498 Hamrick Lane  
Hayward, CA 94544

Ms. Barbara Holland  
20993 Foothill Road  
Hayward, CA 94541

Subject: Fuel Leak Case [REDACTED] Holland Oil, 16301 East 14<sup>th</sup> Street, San Leandro, CA

Dear Ms. Tiers and Ms. Holland:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site and the document entitled, "Work Plan: Additional Subsurface Investigation Groundwater Monitoring Well Installation," dated March 3, 2003 and prepared by Environmental Bio-systems, Inc. The Work Plan presents plans for an additional subsurface investigation of the above-referenced site to include soil borings and monitoring well installation.

ACEH concurs with the proposed scope of work provided that the technical comments below are fully addressed. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

**TECHNICAL COMMENTS**

- 1. Proposed Soil Boring Locations.** ACEH concurs with the proposed boring locations but requests that borings be added in the western (downgradient) portion of the site. In order to assess the extent of soil contamination near the western boundary of the site and to assess potential groundwater contamination moving off-site, a transect of direct push borings is to be located near the western property boundary. Please include one additional boring between proposed locations SC54 and SC50, one additional boring between proposed locations SC50 and SC55, and one additional boring south of proposed location SC55. Please submit a revised map of proposed sampling locations for ACEH approval prior to field activities.
- 2. Laboratory Analysis of Soil Samples.** The Work Plan indicates, "at least one soil sample will be submitted for laboratory analyses from each borehole just above the soil/groundwater interface." ACEH requests that soil samples collected from depths of 2 feet bgs, 5 feet bgs, and the capillary fringe be submitted for laboratory analyses. In addition, ACEH requests that soil samples be submitted for laboratory analyses for all depth intervals where staining, odor, or elevated PID readings are observed. If staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number of soil samples from this interval should be submitted for laboratory analyses to characterize the contamination within this

interval. Please include results in the Soil and Groundwater Investigation Report requested below.

3. **Grab Groundwater Samples in Direct Push Soil Borings.** The Work Plan is not clear regarding the collection of grab groundwater samples from direct push soil borings. Section 5.1 entitled "Drilling" states that "Eleven direct push technology (DPT) soil and groundwater samples will be collected designated SC45 to SC55." However, there is no description of the method for groundwater sampling from DPT borings in the remainder of the Work Plan. ACEH requests that grab groundwater samples be collected within 5 feet of the water table from each direct push soil boring. Please submit a description of the proposed method for grab groundwater sampling for ACEH approval prior to field activities.
4. **Vertical Delineation.** The Work Plan does not include a scope of work to characterize the vertical extent of contamination. ACEH requests that, at a minimum, three borings be extended to a depth of approximately 40 feet below ground surface to characterize the vertical extent of soil and groundwater contamination. Please propose at least two locations within areas of known shallow contamination and one location within the western portion of the site. Soils are to be continuously sampled and logged to assess the vertical extent of contamination. The soil boring logs are to be used to target coarse-grained layers below the water table for depth-discrete groundwater sampling. Each coarse-grained layer that may represent a significant contaminant migration pathway is to be targeted for depth-discrete groundwater sampling. Depth-discrete groundwater samples are to be collected in a boring(s) adjacent to the logged soil boring using techniques that will prevent cross-contamination of separate water-bearing zones and contamination of the depth-discrete groundwater sample by contaminated groundwater from a shallower interval. Please present the proposed locations for vertical delineation on the revised sample location map requested in technical comment 1 and submit a description of the proposed method for depth-discrete groundwater sampling for ACEH approval prior to field activities.
5. **Monitoring Well Installation.** ACEH concurs with the proposed installation of monitoring wells MW-6 and MW-7. However, the screened intervals for these wells are not to exceed 10 feet in length. The need to install monitoring wells MW-8 through MW-10 will be evaluated based upon the results of grab groundwater sampling along the western boundary of the property.
6. **Laboratory Analyses.** Due to potentially higher turbidity, ACEH does not recommend that grab groundwater samples be analyzed for PCBs, SVOCs, or total oil and grease. Please include 1,2-dichloroethane and ethylene dibromide as analytes for soil and groundwater samples. Please include lead as an analyte for soil samples. Please provide a revised summary of planned analytes for soil and groundwater samples for ACEH approval prior to field activities.
7. **Groundwater Monitoring.** Following implementation of the proposed subsurface characterization, quarterly groundwater monitoring will be required for this site.

### TECHNICAL REPORT REQUEST

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

- **March 23, 2006** – Soil and Groundwater Investigation Report
- **60 days following regulatory approval of Soil and Groundwater Investigation Report** – Corrective Action 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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy 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 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, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](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

Ms. Ann Marie Holland Tiers and Ms. Barbara Holland  
October 28, 2005  
Page 4

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**

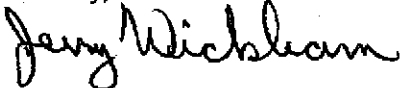
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

**AGENCY OVERSIGHT**

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If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham, P.G.  
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Alyce Sandbach, Deputy District Attorney, Consumer & Environmental Protection Division,  
7677 Oakport Street, Suite 400, Oakland, CA 94502-6577

Edward Martins, Law Offices of Edward Martins, 22698 Mission Blvd., Hayward, CA 94541

Hal Reiland, Reiland and Reiland, P.O. Box 5490, Pleasanton, CA 94566

James Jacobs, Environmental Bio-Systems, Inc, 707 View Point Road, Mill Valley, CA  
94941

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File



<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>ISSUE DATE:</b> July 5, 2005
	<b>REVISION DATE:</b> December 16, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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](mailto: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](mailto: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](mailto: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)