



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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April 3, 2009

Mr. Terry Grayson
ConocoPhillips
76 Broadway
Sacramento, CA 95818

Subject: Fuel Leak Case No. RO00000219 and Geotracker Global ID T0600101476, Unocal #5043, 449 Hegenberger Rd., Oakland, CA 94621

Dear Mr. Grayson:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the document entitled, *Work Plan for Hydrogen Peroxide Injection*, dated January 6, 2009 prepared by Delta. The work plan recommends injecting hydrogen peroxide into well MW-6 and monitoring well MW-7 and MW-8 for performance monitoring purposes. ACEH does not concur with injection into a monitoring well that is not designed for remediation and without an adequate performance monitoring network. Additionally, it appears that the extent of the plume has not been defined since previously installed wells MW-1 and MW-2 contained free product and had high contamination concentrations, respectively. The two wells were decommissioned in 1995 and never replaced leaving the area with the highest concentrations unmonitored. Therefore, we cannot approve your work plan. Additional work to define the extent of contamination is required before any remediation test can be approved. We request that you address the following technical comments, perform the proposed work, and send us the reports requested below.

TECHNICAL COMMENTS

1. **Extent of Groundwater Contamination Plume** – In 1995 two wells (MW-1 and MW-2) located near the dispenser islands were decommissioned to allow for overexcavation of the dispenser islands. Prior to destruction, MW-1 contained free product and MW-2 had high contamination concentrations and as such contained the highest contamination levels on the site. No wells were reinstalled in this area to determine the post excavation dissolved contaminant concentrations. Please present your plan to assess groundwater in report requested below.
2. **Vertical Extent of Contamination** – Soil samples collected at the site from the soil borings were collected only from depths between 2.5 to 6 feet below ground surface (bgs). Maximum concentrations of 14,000 milligrams per kilogram (mg/kg) total petroleum hydrocarbons as gasoline (TPHg) and 160 mg/kg benzene were detected in MW-1 from 2.5 feet bgs. No additional samples were collected to determine if contaminants have migrated vertically. In

addition, confirmation soil samples from the overexcavation performed in 1995 have not been submitted to the ACEH ftp site. Please address this data gap in the work plan requested below and submit results of confirmation sampling after overexcavation by the dates requested below.

3. **Site Conceptual Model** –At this juncture, it may be advantageous to develop a site conceptual model (SCM), which synthesizes all the analytical data and evaluates all potential exposure pathways and potential receptors that may exist at the site, including identifying or developing site cleanup objectives and goals. At a minimum, the SCM should include:
- (1) Local and regional plan view maps placed on a base map which shows an aerial photograph that illustrates the location of sources (former facilities, piping, tanks, etc.) extent of contamination, direction and rate of groundwater flow, potential preferential pathways, and locations of receptors;
 - (2) Geologic cross section maps that illustrate subsurface features, man-made conduits, and lateral and vertical extent of contamination;
 - (3) Regional and local geology and hydrogeology;
 - (4) Plots of chemical concentrations versus time;
 - (5) Plots of chemical concentrations versus distance from the source;
 - (6) Summary tables of chemical concentrations in different media (i.e. soil, groundwater, and soil vapor); and
 - (7) Well logs, boring logs, and well survey maps;
 - (8) Discussion of likely contaminant fate and transport.

If data gaps (i.e. potential contaminant volatilization to indoor air or contaminant migration along preferential pathways, etc.) are identified in the SCM, please include a proposed scope of work to address those data gaps in the work plan due by the date specified below. Please note that the work plan must address all technical comments presented in our December 11, 2006 correspondence and all data gaps identified in the SCM.

4. **Utility Survey.** The utility survey presented did not include the depth of many of the utilities such as storm drains. Please include updated maps and cross-sections with the utility depths in the report requested below.

REQUEST FOR INFORMATION

ACEH's case file for the subject site contains only the electronic files listed on our website at <http://www.acgov.org/aceh/index.htm>. You are requested to submit copies of all other reports and correspondence related to environmental investigations for this property (including Phase I reports) by **May 8, 2009**.

TECHNICAL REPORT REQUEST

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

- **June 5, 2009** –SCM with 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.

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UNDERGROUND STORAGE TANK CLEANUP FUND

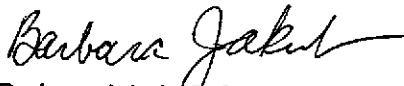
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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) 639-1287 or send me an electronic mail message at barbara.jakub@acgov.org.

Sincerely,



Barbara Jakub, P.G.
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: John Reay, Delta, 11050 White Rock Rd., Suite 110, Rancho Cordova, CA, 94670
Donna Drogos, ACEH
Barbara Jakub, ACEH
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