



ENVIRONMENTAL HEALTH SERVICES  
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April 14, 2015

Walter Sprague  
Pacific Convenience & Fuel  
7180 Knoll Center Parkway, Suite 100  
Pleasanton, CA 94566  
(Sent via E-mail to [WSprague@pcandf.com](mailto:WSprague@pcandf.com))

Ed Ralston  
Phillips 66 Company  
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(Sent via E-mail to: [Ed.C.Ralston@p66.com](mailto:Ed.C.Ralston@p66.com))

Subject: Work Plan Review for Fuel Leak Case No. RO0000219 and GeoTracker Global ID T0600101476, UNOCAL #5043, 449 Hegenberger Road, Oakland, CA 94621

Dear Mr. Sprague and Mr. Ralston:

Alameda County Environmental Health (ACEH) has reviewed the case file, including the recently submitted document entitled *Work Plan- Well Destruction and Waste Characterization* (Work Plan), dated March 23, 2015 and prepared by Antea Group USA, Inc. (Antea) for the subject site.

The Work Plan addresses two items- the destruction of two off-site groundwater monitoring wells, identified as MW-7 and MW-8, and in-situ profiling of soil for waste characterization prior to excavation and disposal.

### Technical Comments

1. Well Destruction – As described in the Work Plan, the destruction of groundwater monitoring wells MW-7 and MW-8 will be performed by over-drilling the two wells and backfilling the boreholes with neat cement to just below the ground surface. Each borehole will then be capped with asphalt to match existing grade.

The method of well destruction meets Alameda County Public Works Agency (ACPWA), the well permitting agency, guidelines.

However, as discussed in the February 24, 2015 meeting with representatives of ACEH, Antea, Pacific Convenience and Fuel (PC&F), and Beretta Investment Group (BIG), the method of well destruction for the two wells should also be acceptable to the property owner, BIG.

If the well destruction methodology is acceptable to BIG, the destruction of wells MW-7 and MW-8 by the proposed method is acceptable to ACEH.

Please provide confirmation that the well destruction methodology has been reviewed by and is acceptable to BIG. Confirmation may be presented in an E-mail correspondence by the date specified below.

2. Waste Characterization – The acceptance criteria, including analysis suite and sampling density, is a function of the receiving landfill facility. A total of three soil samples are proposed to be collected from within the two areas identified for excavation in the Corrective Action Plan (CAP). The Work Plan states one sample is required for every 500 cubic yards (cu-yds) of waste material and an estimated 1,475 cu-yds of soil will be excavated and removed for off-site disposal; hence, three samples are required to satisfy the minimum waste characterization requirements. It is unclear to ACEH if the volume of

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material is based on an in-situ calculation and if a de-bulking factor was applied if the in-situ volume was used. This calculation should be confirmed with the receiving facility.

Please be aware that a contingency may require the collection of additional sample(s) should the excavated volume sufficiently exceed 1,500 cu. yds. to justify additional characterization. It is unclear to ACEH how additional waste characterizations samples will be collected when the disposal method includes direct soil loading for off-site transport.

Though the locations of the boreholes from which the samples are to be collected are depicted on Figure 3 of the Work Plan, there is no indication of the depth at which the samples will be collected for submittal for laboratory analysis, and the sample selection protocol within the length of each boring is not discussed.

Therefore ACEH requests a brief correspondence outlining the landfill acceptance criteria, the volume calculations presented to the receiving landfill and the number of samples to be recovered, and sample selection protocol within the length of each boring.

#### **Technical Report Request**

Please upload technical reports to the ACEH ftp site (Attention: Keith Nowell), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and by the schedule outlined below:

- **May 1, 2015- BIG Acceptance Confirmation E-mail** (file name: RO0000219\_CORRES\_L\_YYYY-MM-DD)
- **May 1, 2015- Waste Disposal Criteria Confirmation** (via E-mail Correspondence) (file name: RO0000219\_CORRES\_L\_YYYY-MM-DD)

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.

If you have any questions or concerns regarding this correspondence or your case, please call me at (510) 567-6764 or send me an electronic mail message at [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org).

Sincerely,

Keith Nowell, P.G., C.H.G.  
Hazardous Materials Specialist

cc: Dennis Dettloff, Antea Group, 11050 White Rock Road, Suite 110, Rancho Cordova, CA 95670  
(Sent via E-mail to: [dennis.dettloff@anteagroup.com](mailto:dennis.dettloff@anteagroup.com))  
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