

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



F

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

May 6, 2008

Mr. Dinesh Maniar
Diversified Investment and Management Corporation
400 Oyster Point Blvd., Suite 415
South San Francisco, CA 94080

Mr. Nelson Tsui
Oakland International Trade Center
633 Hegenberger Road
Oakland, CA 94621

Subject: Fuel Leak Case No. RO0000226 and Geotracker Global ID T0600100990, Oakland International Trade Center, 625 Hegenberger Road, Oakland, CA 94621

Dear Mr. Maniar and Mr. Tsui:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "*Work Plan for Soil Vapor and Groundwater Sampling, 625 Hegenberger Road, Oakland, California,*" dated March 28, 2008. The Work Plan was prepared on your behalf by AEI Environmental Consultants.

The Work Plan proposes site investigation activities consisting of collection of soil vapor samples from five locations and collection of groundwater samples from the existing monitoring well network. The soil vapor and groundwater sampling proposed in the Work Plan is conditionally approved and may be implemented provided that the additional requirements discussed in technical comments 1 and 2 below are incorporated during the proposed field investigation. As discussed in technical comment 1, based on the extent of contamination and the concentrations of residual fuel hydrocarbons left in place after tank removal and remedial excavation, we request soil vapor sampling at four additional locations in order to evaluate potential vapor intrusion. Submittal of a revised Supplemental Work Plan or work plan addendum is not required unless an alternate scope of work is proposed.

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

TECHNICAL COMMENTS

1. **Soil Vapor Sampling Locations.** In 1996, soil within the area of the former tanks and dispensers was excavated to depths of approximately 5 to 7 feet bgs. Soil samples collected from the bottom of the excavation in April 1996 contained up to 16 micrograms per kilogram of benzene. Dissolved phase concentrations of fuel hydrocarbons are also elevated in the area of the former tanks as indicated by the concentrations of fuel hydrocarbons detected in boring AEI B-28, which was advanced on June 1, 2000. Total petroleum hydrocarbons as

Mr. Dinesh Maniar
Mr. Nelson Tsui
RO0000226
May 6, 2008
Page 2

gasoline and benzene were detected in groundwater samples collected from boring AEI B-28 at concentrations up to 150,000 and 13,000 micrograms per liter, respectively. Based on the horizontal extent of contaminated soil and the concentrations of residual fuel hydrocarbons in soil and groundwater in the area of the former tanks and dispensers, we request that additional soil vapor samples be collected to evaluate potential vapor intrusion. Specifically, we request that four additional soil vapor samples be collected as shown on Attachment A. Please present the results in the Soil Vapor and Groundwater Sampling Report requested below.

2. **Groundwater Sampling of Existing Monitoring Wells.** The proposal to sample existing monitoring wells at the site is acceptable. Due to the former presence of a sump adjacent to the former tanks that may potentially have received waste oil and solvents, we request that the groundwater samples be analyzed for chlorinated solvents using EPA Method 8260 in addition to the proposed groundwater analyses. Please present the results in the Soil Vapor and Groundwater Sampling Report requested below.

TECHNICAL REPORT REQUEST

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

- **Soil Vapor and Groundwater Sampling Report – July 21, 2008**

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).

Mr. Dinesh Maniar
Mr. Nelson Tsui
RO0000226
May 6, 2008
Page 3

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) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



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

Mr. Dinesh Maniar
Mr. Nelson Tsui
RO0000226
May 6, 2008
Page 4

Attachment A: Additional Soil Vapor Sampling Locations

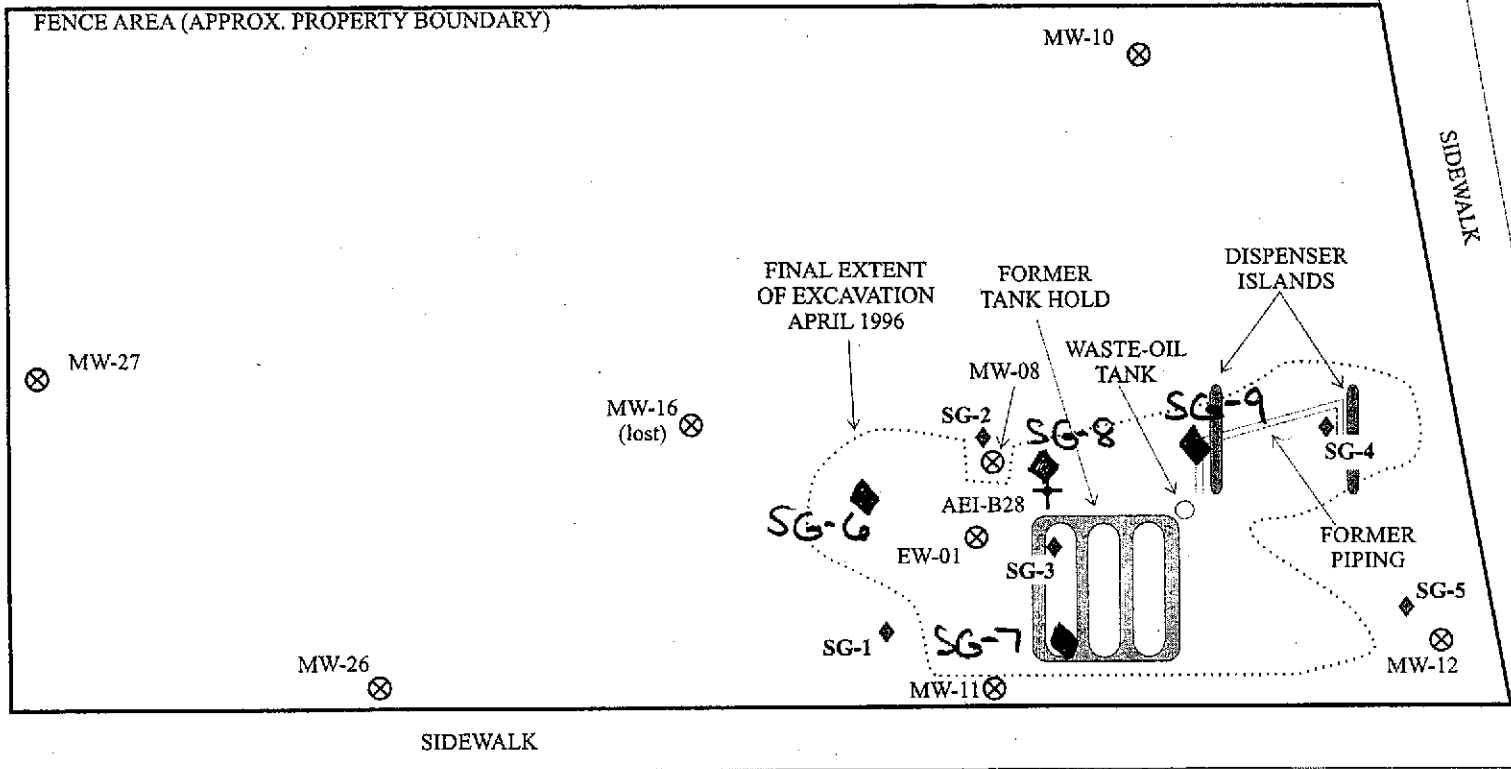
Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Leroy Griffin
Oakland Fire Department
250 Frank H. Ogawa Plaza, Ste. 3341
Oakland, CA 94612-2032

Peter McIntyre
AEI Consultants
2500 Camino Diablo, Suite 100
Walnut Creek CA 94597

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

COMMERCIAL WAREHOUSE PROPERTY



0' 25' 50'
SCALE: 1 in = 50 ft

KEY	
⊗	Monitoring Well Locations
+	Soil Boring (June 2000)
◆	Proposed Soil Vapor Sampling Location

AEI CONSULTANTS 2500 CAMINO DIABLO, WALNUT CREEK, CA	
SITE PLAN	
625 HEGENBERGER ROAD OAKLAND, CALIFORNIA	FIGURE 2 AEI PROJECT NO 277254

Attachment A: Additional Soil Vapor Sampling Locations

**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)