

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) 337-93

January 20, 2009

Mr. Alvaro Avendano  
Alvaro and Hilda Avendano Trust  
1235 East Williamson Road  
Manteca, CA 95337-8672

Western Stucco Company  
P.O. Box 1166  
West Sacramento, CA 95691-1166

Sacramento Stucco  
860 Riske Lane  
West Sacramento, CA 95691-2803

Mr. Lewis Winchell  
P.O. Box 1166  
West Sacramento, CA 95691-1166

Subject: Fuel Leak Case No. RO0000319 and Geotracker Global ID T0600102059, Western Stucco, 5115 East Eighth Street, Oakland, CA 94601

Dear Ms. Avendano, Mr. Winchell, Sacramento Stucco, and Western Stucco:

I have been assigned as the case worker for the fuel leak case at the above referenced site. Please send future correspondence for the site to my attention. Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site. The most recent report for the site appears to be the report entitled, "*Subsurface Investigation Report (B1-B6) and Sensitive Receptor Survey, Fuel Leak Case Ro000319, Former Western Stucco Products Site, 5115 East Eight Street, Oakland, 94601,*" dated June 16, 2003 (Report).

As a result of site characterization activities between 1997 and 2003, total petroleum hydrocarbons (TPH) as gasoline have been detected in soil and groundwater samples at concentrations up to 3,200 milligrams per kilogram (mg/kg) and 590,000 micrograms per liter ( $\mu\text{g/L}$ ), respectively. Total petroleum hydrocarbons (TPH) as diesel have been detected in soil and groundwater samples at concentrations up to 2,000 mg/kg and 83,000  $\mu\text{g/L}$ , respectively.

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

**TECHNICAL COMMENTS**

1. **Groundwater Sampling.** The most recent groundwater samples appear to have been collected in March 2003. We request that you collect groundwater samples from the existing groundwater monitoring wells to provide confirmation that petroleum hydrocarbon concentrations in groundwater are stable or decreasing and to help evaluate differences noted between grab groundwater sampling results and monitoring well sampling results. Elevated concentrations of petroleum hydrocarbons have also been detected outside the area of the former gasoline and diesel underground storage tanks, which may indicate that releases occurred at the site from previous operations other than fueling operations or leaks. The laboratory analytical reports for groundwater samples collected from boring B-2, B-3, and B-4 note Stoddard solvent in the groundwater samples. Due to the potential for releases other than fuel releases at the site, we request that you analyze the groundwater samples for TPH as gasoline and TPH as diesel using EPA Method 8015 and full scan VOCs including chlorinated

Mr. Al Avendano  
Mr. Lewis Winchell  
Sacramento Stucco  
Western Stucco  
RO0000319  
January 20, 2009  
Page 2

solvents using EPA method 8260. Please present results from the groundwater sampling in the Groundwater Sampling Report requested below.

2. **Recommendations for Future Site Actions.** We request that you evaluate the groundwater sampling data requested in technical comment 1 along with all historic data for the site to provide recommendations for future actions. Please present your evaluation and recommendations in the 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:

- **May 29, 2009** – Groundwater Sampling Report

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

Mr. Al Avendano  
Mr. Lewis Winchell  
Sacramento Stucco  
Western Stucco  
RO0000319  
January 20, 2009  
Page 3

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

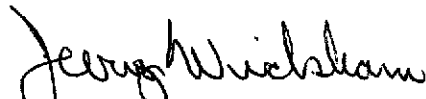
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

#### 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](mailto:jerry.wickham@acgov.org).

Sincerely,



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

Mr. Al Avendano  
Mr. Lewis Winchell  
Sacramento Stucco  
Western Stucco  
RO0000319  
January 20, 2009  
Page 4

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Leroy Griffin, Oakland Fire Hazardous Materials Unit, 250 Frank Ogawa Plaza, Suite 3341,  
Oakland, CA 94612

Paul King, P&D Environmental, 55 Santa Clara Avenue, Suite 240, Oakland, CA 94610

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)