



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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July 2, 2008

Mr. Bill Borgh (via electronic mail)
ConocoPhillips
76 Broadway
Sacramento, CA 95818

Ramesh and Promila Sood
376 Lewelling Blvd.
San Lorenzo, CA 94580

Subject: Fuel Leak Case No. RO0000344 and Geotracker Global ID T0600101469, UNOCAL #5760, 376 Lewelling Boulevard, San Lorenzo, CA 94580

Dear Mr. Borgh and Mr. and Mrs. Sood:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted documents entitled, *Semi-Annual Summary Report – Fourth Quarter 2007 through First Quarter 2008* dated April 1, 2008, *Monitoring Well Abandonment and Replacement Report* dated August 24, 2007, and *Sensitive Receptor Report* dated August 22, 2006, which were prepared by Delta Consultants. Based upon our review of the case file, we request that you address the following technical comments, perform the proposed work, and send us the technical reports described below.

TECHNICAL COMMENTS

1. **Monitoring Well Abandonment and Replacement Report** – Thank you for recently uploading this document to the Alameda County ftp site. I have reviewed this report and have identified a number of items that appear to be missing:
 - The original well construction details for U-1 and U-3 were not provided in either the work plan or the report. Information on the auger size used for the original wells is needed to ensure that the wells have been properly destroyed. Please provide the original well construction details for U-1 and U-3 in the addendum requested below.
 - The report does not show destroyed well locations, in particular, U1 which was relocated. It is advised that all historical wells, borings and sample points be included on site maps, especially the location of destroyed wells for which historical groundwater monitoring data is presented in the data tables.
 - The report indicates that well U-1 was grouted rather than overdrilled because a trailer was parked too close to the well to obtain rig access. The report does not indicate that this change was approved by the Alameda County Public Works Agency (ACWA) nor does it provide specifics of the well destruction. Please provide a copy of the ACPWA approval. Delta indicated in our April 14, 2008 meeting that the well was grouted and the top of the well seal was removed and replaced with material. Please describe the well destruction method that was used in the addendum requested below. Include a

description of the well destruction method, how the well seal was removed, to what depth and with what material it was replaced.

- The report does not include the driller's information, the geologist on-site, a copy of the DWR well logs for destruction and reinstallation, or the survey data. Please include these in the addendum.
- The well development field data sheets were not included in the report. Please include a copy of these in the addendum.

Please submit a Well Decommissioning Report Addendum with the missing information as described in this technical comment.

2. **Well Survey** – The Sensitive Receptor Report that was submitted on August 22, 2006 did not show the location of the wells identified by the Department of Water Resources on the map. Please plot these on the one-mile radius map to ensure that there are no downgradient receptors and include the well information obtained in a report. The East Bay Plain Groundwater Basin Beneficial Use Evaluation Report (CARWQCB, June 1999) indicates that there may have been active irrigation, municipal and domestic wells downgradient of the site. Please provide this information in the Work Plan requested below.

The report also mentions that San Lorenzo Creek is located within 500 feet of the site. However, no evaluation was made as to whether San Lorenzo Creek is a receptor for groundwater contamination from the site. Please include an evaluation of this in the Work Plan requested below. If your evaluation determines that San Lorenzo Creek could potentially be affected, please include a plan to assess the Creek in the Work Plan requested below.

3. **Regional Geologic and Hydrogeologic Setting** – The regional and local geologic and hydrogeologic setting must be understood in order to begin preparing a site conceptual model (SCM). Please include a concise narrative discussion of the regional geologic and hydrogeologic setting. Include a list of technical references you reviewed. Include a concise discussion of the on-site geology, hydrogeology, release history, source zone, plume development and migration, attenuation mechanisms, preferential pathways, and potential threat to down-gradient and above-ground receptors (e.g. contaminant fate and transport) in the Work Plan requested below.
4. **Contaminant Source Area Characterization** – It appears that the lateral extent of contamination in off-site soil and groundwater has been characterized but neither the vertical extent of the contamination nor the lateral extent of on-site contamination has been fully characterized. This is evident from the dissolved phase TPHg map presented in the monitoring reports which show the TPHg groundwater contours drawn with question marks upgradient of U-1 and U-1R. Also, no soil samples were collected from U-1 (downgradient of the underground storage tanks [USTs]) during well installation (or re-installation). In a dispenser sample collected from D-4, the 3-foot sample contained 0.020 ppm MTBE. No deeper samples were obtained from this location and no follow up investigation was performed to further investigate the MTBE after the dispenser sampling was performed. Please submit a work plan to fully define the vertical extent of petroleum hydrocarbons and oxygenates in soil and groundwater in the areas adjacent to the dispenser islands and the USTs by the due date requested below.

Your work plan may include injection well installation and sampling that will help with future pilot testing in the areas with residual dissolved petroleum hydrocarbon contamination. However, ACEH believes that until the source area is fully characterized, a work plan for

hydrogen peroxide injection is premature. Also, ACEH will not entertain "spot remediation" in the same well that is used as a compliance point. As stated above, the source area needs to be defined and an appropriate method to remediate and monitor the residual contamination whether it be in soil, groundwater or both, should be determined after the full extent of contamination is defined.

5. **Groundwater Contaminant Plume Monitoring** – ACEH agrees with Delta that U-1R and U-3R should be purged and sampled on a quarterly basis for one year. Please ensure that the following analytes are included for all on- and off-site wells: TPH-g, benzene, toluene, ethylbenzene, xylenes, MTBE, Di-isopropyl alcohol (DIPE), ethyl tertiary butyl amyl (ETBE), tertiary amyl methyl ether (TAME), tertiary butyl alcohol (TBA), 1,2-dichloroethane (1,2-DCA) and ethylene dibromide (EDB) by EPA Method 8260. Please discontinue ethanol analysis in all wells except U-1R and U-3R and please collect groundwater elevation data for all wells each quarter. You may continue to submit the results in your semi-annual monitoring reports.

REQUEST FOR INFORMATION

ACEH's case file for the subject site contains only the electronic reports as listed on our website (<http://www.acgov.org/aceh/lop/ust.htm>). You are requested to submit copies of all other reports related to environmental investigations for this property (including Phase 1 reports) by **October 6, 2008**.

TECHNICAL REPORT REQUEST

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

- **September 8, 2008** – Well Decommissioning Report Addendum
- **October 1, 2008** – Semi-annual Monitoring Report and Soil and Water Investigation 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/electronic_submittal/report_rqmts.shtml).

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.

Bill Borgh
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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,

A handwritten signature in blue ink that reads "Barbara J. Jakub". The signature is written in a cursive style with a horizontal line at the end.

Barbara J. Jakub, P.G.
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Delta, Dennis Dettloff, 11050 White Rock Rd., Rancho Cordova, CA 95670 (via electronic mail)
Donna Drogos, ACEH (via electronic mail)
Barbara Jakub, ACEH
File

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)