



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

March 27, 2009

Mr. Terry Grayson  
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. Grayson 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 document entitled, *Work Plan Additional Assessment* dated December 1, 2008. The work plan proposes shallow and deep borings to define the lateral and vertical extent of contamination at the site. Three direct push borings GP-6, GP-7 and GP-8 are proposed in the northeast corner of the fuel USTs to determine if groundwater is impacted in this area. Previously methyl tertiary butyl ether (MTBE) was detected in dispenser sample D-4, collected from three feet below ground surface (bgs) at a concentration of 0.020 milligrams per kilogram (mg/kg). Delta proposes to advance three cone penetrometer testing (CPT) borings to a depth of 50 feet to evaluate the vertical extent of contamination in the area of the USTs and downgradient of the dispenser island.

The work plan is approved conditionally provided the technical comments below are addressed in writing prior to performing the work. No additional work plan submittal is required. ACEH requests that you perform the work requested below, address the following technical comments, and submit the report requested below. Please provide 72-hour advance written notification to this office by e-mail ([barbara.jakub@accgov.org](mailto:barbara.jakub@accgov.org)) prior to the start of field activities.

#### **TECHNICAL COMMENTS**

1. **Dispenser Island Area** – The work plan proposes advancing three direct push borings GP-6, GP-7 and GP-8 in the dispenser island area, collecting soil samples at 5, 10, 15 and 20 feet bgs and collecting a groundwater sample at the base of the boring. Please ensure that each boring is advanced at least to the sand layer that is shown on your cross-sections starting at an approximate depth of 20 to 25 feet bgs and soil and groundwater samples are analyzed from that unit.
2. **CPT Borings** – ACEH concurs with the depth of the CPT borings; however, we request that you advance an additional boring in the vicinity of U-1 and UR-1 to determine if groundwater

is impacted downgradient of the one well which has free product. Please send a map with your additional proposed boring location by the date requested below.

3. **Beneficial Use for Groundwater** – The work plan states that total dissolved solids in groundwater at the site is greater than 500 milligrams per liter (mg/L) and that this is above the secondary drinking water limit. The Basin Plan non-beneficial use criteria for non-potable water is 3,000 mg/L TDS with a yield of less than 200 gallons per day. Groundwater at your site does not meet these criteria; therefore, groundwater at the site is of beneficial use.
4. **Unauthorized Release Form** – According to our files, no unauthorized release report has been submitted for the initial tank release. If you have a copy, please submit it to our FTP site. If the URF cannot be found please complete one from the UNIDOCs website and submit it to our FTP site.

**Request for Information** – At least three sampling events are referenced in various reports but no reports are included in our files for these activities. These are listed below:

The 1987 gasoline and waste-oil tank UST removal sampling, Divestment soil borings reported to have been advanced in September 1993, three of which were converted to soil vapor extraction wells, and GP-1 through GP-5 are shown on your cross sections in your work plan but are not included in a report.

Please upload these reports and all other reports, data, and correspondence related to environmental investigations for this property (including Phase I reports) by the date requested below. Ensure that duplicate copies of reports are not uploaded by referring to our website at <http://www.acgov.org/aceh/index.htm>.

### **TECHNICAL REPORT REQUEST**

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

- **April 30, 2009** – Revised Map and URF
- **June 1, 2009** – Soil and Water Investigation 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/electronic\\_submittal/report\\_rqmts.shtml](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.

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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](mailto:barbara.jakub@acgov.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Barbara J. Jakub". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

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  
Donna Drogos, ACEH  
Barbara Jakub, 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 ftp site Coordinator.
  - 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)