



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

March 5, 2015

Ed Ralston
Program Manager
Phillips 66 Company
76 Broadway
Sacramento, CA 95818
(Sent via E-mail to: Ed.C.Ralston@p66.com)

Subject: Conditional Work Plan Approval for Fuel Leak Case No. RO0000356 and GeoTracker
Global ID T0600100201, BP #11117, 7210 Bancroft Avenue, Oakland, CA 94605

Dear Mr. Ralston:

Thank you for the recently submitted document entitled, *Work Plan for Contamination Delineation* (Work Plan), dated December 31, 2014, which was prepared by Antea Group (Antea), for the subject site. Alameda County Environmental Health (ACEH) staff has reviewed the case file including the above-mentioned work plan for the above-referenced site. The work plan proposes to advance several borings in areas previously shown to contain significantly elevated concentrations of petroleum hydrocarbons and fuel components. The purpose of the borings is to investigate for the presence of residual contamination. If encountered, step out borings are proposed to delineate the areas of impact.

During a phone conversation on March 2, 2015 with Mr. Dennis Dettloff, Project Manager for Antea, Mr. Dettloff stated at least three borings would be advanced in each of the three areas to be investigated. Mr. Dettloff indicated the use of a mobile laboratory would be advantageous to facilitate the need for step out borings. ACEH concurred with the proposed use of a mobile laboratory.

The proposed scope of work may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed.

Please schedule and complete the fieldwork activities by the date specified below and provide ACEH with at least three (3) business days notification prior to conducting the fieldwork.

TECHNICAL COMMENTS

1. **Soil Sampling** – The Work Plan states that, at a minimum, soil samples with the highest PID measurements in each boring and the bottom of each boring will be collected and retained for laboratory analysis. Additional soil samples may be collected and retained for laboratory analysis based on field observations, changes in lithology, depth of first water, and historical occurrences of hydrocarbons.

ACEH requests that soil samples be collected and analyzed at minimum intervals of five feet, areas of obvious contamination, the soil/groundwater interface, and at significant changes in lithology, and from the base of the boring. If staining, odor, or elevated PID readings are observed, a sufficient number of soil samples from this interval are requested be submitted for laboratory analyses to characterize the fuel hydrocarbon concentrations within this interval.

2. **Groundwater Sampling** – The Work Plan does not indicate if groundwater sampling will be performed. As significantly elevated concentrations of petroleum hydrocarbons and fuel components have been observed in groundwater with corresponding soil concentrations exhibiting a moderate level of impact, e.g. bore A-2, ACEH requests that each boring be advanced to a sufficient depth for the recovery of grab groundwater samples.
3. **Scope of Laboratory Analysis** – ACEH requests that total petroleum hydrocarbons as diesel (TPHd) by EPA Method 8015B be added to the analysis suite as diesel compounds have been reported at the site.

ACEH requests that the grab groundwater samples requested in Technical Comment 2 above be analyzed for TPHg, BTEX, the fuel oxygenates, and lead scavengers by the test methods identified in the Work Plan, and for TPHd by the test method identified above.

4. **CAM 17 Analysis** - ACEH is in agreement of CAM 17 analysis for disposal purposes. Please conduct a sufficient analysis for CAM 17 metals as required by the disposal facility.
5. **Mobile Laboratory** – The use of a mobile laboratory was not specified in the Work Plan; however, due to the iterative nature of the proposed work, a mobile laboratory would likely eliminate multiple site mobilizations and associated costs. Please evaluate the use of a mobile laboratory.

Alternatively, if a standard laboratory is used, please provide ACEH, via email, with tabulated analytical data, a copy the initial laboratory analysis report, and a draft figure showing the proposed step out borings locations, if any, following the initial phase of verification sampling. ACEH will quickly review the data and proposed boring locations for consistency with the goal of contamination delineation. Step out boring advancement should not occur without prior ACEH authorization.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Keith Nowell), according to the following schedule and file naming convention:

- **March 31, 2015** – Email correspondence addressing the type of laboratory (fixed or mobile) to be used for the investigation.
- **May 15, 2015** – Laboratory Analysis Report provided via email (for the Fixed-Base Brick and Mortar Laboratory Alternative only) with tabulated analytical data, a copy the initial laboratory analysis report, and a draft figure.

Mr. Ralston
RO0000356
March 5, 2015, Page 3

- **June 26, 2015 – Soil and Water Investigation Report** (file to be named SWI_R_yyyy-mm-dd)
- **TBD** – Report documenting excavation activities through the use of large diameter augers (file to be named EX_R_yyyy-mm-dd)

Thank you for your cooperation. ACEH looks forward to working with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Keith Nowell
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)

Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (Sent via E-mail to: lgriffin@oaklandnet.com)

Dilan Roe, ACEH (Sent via E-mail to: dilan.roe@acgov.org)
Keith Nowell ACEH (Sent via E-mail to: keith.nowell@acgov.org)
GeoTracker/ File