

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) 337-9335

July 30, 2008

Mr. William Borgh  
ConocoPhillips Company  
76 Broadway  
Sacramento, CA 95818

De L Liu and Na Li  
922 Saddlehorn Court  
Danville, CA 94506

Henry O. Armour  
P.O. Box 2527  
Olympia, WA 98507

CD & PWS Enterprises, Inc.  
103 Blossom Court  
Danville, CA 94506

Subject: Fuel Leak Case No. RO0000361 and Geotracker Global ID T0600100101, Unocal #7376, 4191 First Street, Pleasanton, CA 94566

Dear Mr. Borgh:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the most recent report entitled, "*Soil and Groundwater Investigation Report – May 15, 2008.*" The report was prepared by Delta Environmental and was received by ACEH on May 23, 2008. The report presents soil and groundwater sampling results from seven cone penetration test (CPT) borings on site and within the former railway corridor (Alameda County Transportation Corridor) located immediately northwest of the 4191 First Street service station.

The highest concentrations of fuel hydrocarbons in soil were detected in soil samples from boring CP-1, which is located on-site, directly northwest of the service station USTs. Free product was observed in the soil samples from CP-1 at a depth of approximately 15 feet bgs. Fuel hydrocarbons were detected and strong odors were noted in the soil samples continuing downward from approximately 15 feet bgs to the total depth of approximately 70 feet bgs. Strong odors were also noted in soil samples from boring CP-5 down to depths of greater than 58 feet bgs. Boring CP-5 is located off-site in the former railway corridor, northwest (downgradient) of the USTs. Free product has been observed periodically in off-site monitoring well MW-5.

No remediation has been conducted at the site to date. Based on the lateral and vertical extent of the source area with elevated concentrations of fuel hydrocarbons in soil, observations of free product both on-site and off-site, and the extent of the dissolved hydrocarbon plume, remediation is required for this site. We request that you address the technical comments below and prepare a Pilot Test Work Plan or Draft Corrective Action Plan for the site. If additional site characterization data are required prior to site cleanup, please propose the site characterization activities in the Pilot Test Work Plan.

## TECHNICAL COMMENTS

1. **Monitoring Well Construction.** Several monitoring wells at the site have filter pack and screen lengths that exceed 20 to 30 feet in length. Monitoring wells MW-1 and MW-3, which are located immediately south of the USTs, apparently have filter pack intervals that exceed 30 feet, from apparently 62 to 95 feet bgs. Please show the screen intervals for all monitoring wells on the hydrogeologic cross sections requested in technical comment 4. Please include a table of well construction details in the Pilot Test Work Plan or Draft Corrective Action Plan requested below. For all monitoring wells on and off-site, the well construction table is to describe the well diameter, screen slot size, total depth of the boring, depths of the screened interval, depths of the filter pack, and other well construction details that may be relevant.
2. **Former Bunker Fuel Tank.** In our previous correspondence dated March 21, 2008 (attached), we requested that you review the relevant investigation data regarding the former bunker fuel tank and present recommendations to investigate whether a tank may still be in place and whether long chain hydrocarbon contamination is present near the former location of the bunker fuel tank. No recommendations regarding the former bunker fuel tank were included in the "*Soil and Groundwater Investigation Report – May 15, 2008.*" Please review the attached March 21, 2008 correspondence and address this item in the Pilot Test Work Plan or Draft Corrective Action Plan requested below.
3. **Well Survey.** The "*Soil and Groundwater Investigation Report – May 15, 2008,*" refers to a well survey conducted in January 1988; however, the locations of nearby wells are not shown. Please complete an updated, detailed well survey to locate all water supply wells within 2,000 ft of the subject site. Submittal of maps showing the location of all wells identified in your study, and the use of tables to report the data, including well construction details, collected as part of your survey are required. Well construction details are to include the well diameter, screen slot size, total depth of the boring, depths of the screened interval, depths of the filter pack, year of installation, and other construction details that may be relevant. The status of the water supply well, whether active, decommissioned, or unknown is to be included where known. Please present the results in the Pilot Test Work Plan or Draft Corrective Action Plan requested below.
4. **Hydrogeologic Cross Sections.** We concur with the conclusions in the "*Soil and Groundwater Investigation Report – May 15, 2008,*" that hydraulic gradients appear variable across the site and are not consistent with the direction of the regional hydraulic gradient. We also concur that differences in groundwater elevations across the site may be related to lithologic conditions or structural offset. Given the conclusions put forth in the report, we find it surprising that no geologic cross sections are presented to support this interpretation. Detailed hydrogeologic cross sections were presented in a previous report for the site entitled, "*Off-Site Subsurface Investigation Report,*" dated March 20, 2002 and prepared by Gettler-Ryan, Inc. We request that you review the previous cross sections and prepare updated cross sections incorporating data from the more recent soil borings and monitoring wells. Please present the updated cross sections in the Pilot Test Work Plan or Draft Corrective Action Plan requested below.

5. **Source of Fuel Hydrocarbons Detected in Borings CP-6 and CP-7.** We do not concur with the conclusion that fuel hydrocarbons detected in groundwater samples from borings CP-6 and CP-7 are most likely from an off-site source. Based on the migration of free product and dissolved phase hydrocarbons northwest from the site and apparent variable groundwater flow directions, it appears more likely that the fuel hydrocarbons detected in borings CP-6 and CP-7 originated from the service station at 4191 First Street. Therefore, we do not concur with the recommendation to install a monitoring well southeast of well MW-9. If you elect to install a monitoring well at this location, we recommend that the costs not be reimbursable from the UST Cleanup Fund.

### TECHNICAL REPORT REQUEST

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

- **September 29, 2008** – Pilot Test Work Plan or Draft Corrective Action Plan
- **35 days following end of each quarter** - Quarterly Monitoring Reports

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) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy 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 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, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board 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

William Borgh  
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July 30, 2008  
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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

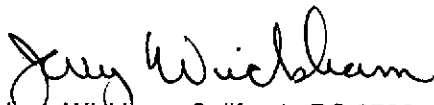
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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

Sincerely,



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

Attachment: ACEH Correspondence dated March 21, 2008

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

William Borgh  
RO0000361  
July 30, 2008  
Page 5

cc: Cheryl Dizon, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway  
Livermore, CA 94551

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street  
Pleasanton, CA 94566

Les Hausrath, Wendel, Rosen, Black & Dean, 1111 Broadway, 24<sup>th</sup> Floor, Oakland, CA  
94607

Rory MacNeil, Alameda County Public Works, 399 Elmhurst Street, Hayward, CA 94544-  
1307

Daniel Davis, Delta Environmental Consultants, Inc., 3164 Gold Camp Drive, Suite 200  
Rancho Cordova, CA 95670

Donna Drogos, ACEH  
✓ Jerry Wickham, ACEH  
File

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HEALTH CARE SERVICES

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March 21, 2008

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76 Broadway  
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Subject: Fuel Leak Case No. RO0000361 and Geotracker Global ID T0600100101, Unocal #7376, 4191 First Street, Pleasanton, CA 94566

Dear Mr. Borgh:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site. In correspondence dated November 29, 2005, ACEH conditionally approved an investigation that included cone penetration test (CPT) borings on site and within the former railway corridor (Alameda County Transportation Corridor) located immediately northwest of the service station at 4191 First Street. Due to a lengthy process to obtain access to the former railway corridor, the field investigation was delayed until February 2008. One of the purposes of this correspondence is to establish a revised schedule for submittal of a site investigation report presenting results of the CPT investigation. We request that you submit a Soil and Groundwater Investigation Report presenting the results of the CPT investigation by **May 23, 2008**.

The second purpose of this correspondence is to discuss the presence and possible source of long chain hydrocarbons detected in the former railway corridor. ACEH staff have reviewed two recently submitted reports entitled, "*Soil Investigation Report, Alameda County Transportation Corridor, West of First Street, between Bernal Avenue and Stanley Boulevard, Pleasanton, California,*" dated January 25, 2008 and "*Phase I Environmental Site Assessment Report, Alameda County Transportation Corridor, West of First Street, between Bernal Avenue and Stanley Boulevard, Pleasanton, California,*" dated November 7, 2007. Both reports were prepared for the City of Pleasanton by BSK Associates and present results from investigation of the Alameda County Transportation Corridor. The Alameda County Transportation Corridor is a linear property that was a former railway line from approximately 1939 until 1982. A portion of the Alameda County Transportation Corridor is located immediately northwest of the service station at 4191 First Street.

Seven soil borings were advanced within the Alameda County Transportation Corridor as part of the investigation conducted by BSK. The borings were advanced along a linear transect northwest (downgradient) of the service station at 4191 First Street. Petroleum hydrocarbons were detected in three of the seven soil borings. The highest concentrations of petroleum

hydrocarbons were detected in the diesel oil range and as oil & grease. TPH as gasoline and MTBE were also detected in the soil samples. Previous investigations conducted on behalf of ConocoPhillips in the former railway corridor have also detected fuel hydrocarbons and oxygenates in soil and groundwater as well as petroleum hydrocarbons in the heavier range. Monitoring well MW-5 is located in the Alameda County Transportation Corridor northwest (downgradient) from the USTs at 4191 First Street. Free-phase product accumulated and was sampled from monitoring well MW-5 in June 1997. A forensic geochemical analysis indicated that the free product consisted of both gasoline and a long chain hydrocarbon mixture. The gasoline and long chain hydrocarbon mixture are likely from two separate sources and releases. The gasoline in well MW-5 appears to correlate to the fuel release from 4191 First Street. Two possible sources of the long chain hydrocarbon mixture have been identified: 1) a fuel pipeline within the Alameda County Transportation Corridor and 2) a former bunker fuel tank south of the Alameda County Transportation Corridor. Based on inspection data from the pipeline, the type of fuel carried in the pipeline, and the apparent distribution of the contamination, the pipeline does not appear to be a source of the long chain hydrocarbons. The bunker fuel tank appears to be a more likely source of the long chain hydrocarbons. A 1907 Sanborn map (Attachment A) shows the bunker fuel tank on the property south of the Alameda Transportation Corridor. This location is estimated to be along the northwestern boundary of parcel 94-110-12-4, which is the 4191 First Street parcel. Because the bunker fuel tank appears to be or have been located within the same parcel as the fuel release from the service station, investigation of the possible release from the bunker fuel tank is to be conducted as part of case RO0000361.

We request that you review the relevant investigation data including the attached map showing the former bunker fuel tank and present recommendations to investigate whether a tank may still be in place and whether long chain hydrocarbon contamination is present near the former location of the bunker fuel tank. Technical reports submitted to Alameda County Environmental Health since 2006 can be viewed over the Internet at the following website (<http://ehgis.acgov.org/dehpublic/dehpublic.jsp>). Please include these recommendations in the Soil and Groundwater Investigation Report requested below.

#### **TECHNICAL REPORT REQUEST**

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

- **May 23, 2008** – Soil and Groundwater Investigation Report
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### PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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### UNDERGROUND STORAGE TANK CLEANUP FUND

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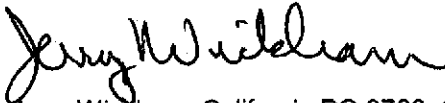
William Borgh  
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**AGENCY OVERSIGHT**

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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

Attachment A: Sanborn Map 1907

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Cheryl Dizon, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway  
Livermore, CA 94551

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street  
Pleasanton, CA 94566

Les Hausrath, Wendel, Rosen, Black & Dean, 1111 Broadway, 24<sup>th</sup> Floor, Oakland, CA  
94607

Rory MacNeil, Alameda County Public Works, 399 Elmhurst Street, Hayward, CA 94544-  
1307

Dennis Dettloff, Delta Environmental Consultants, Inc., 3164 Gold Camp Drive, Suite 200  
Rancho Cordova, CA 95670

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

1907

HALL

PLANN

51

4' PLATFORM CLOSED

HALL W. HO. CO. NO. 1.  
CONCRETE FLOOR  
CLEANING SHED

HALL W. HO. CO. NO. 2.  
ALUMINUM FLOOR ON GRAVIO  
MAY BE ON GROUND

Oil Tank  
in Grd.

15'

2" PIPE

SPP

VINEYARD

Scale of Feet

53

Attachment A: 1907 Sanborn Map

<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)