

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

January 22, 2008

Mr. George Jaber
George H. Jaber Trust
2801 Encinal Avenue
Alameda, CA 94501-4726

Subject: Fuel Leak Case No. RO00000373 Olympic Station (Global ID #T0600102256), 1436 Grant Avenue, San Lorenzo, CA

Dear Mr. Jaber:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Work Plan Addendum," dated September 30, 2007 prepared by Conestoga Rover and Associates (CRA). The scope of work in the Work Plan Addendum recommends the installation soil borings advanced to 20 feet bgs., completion of a preferential pathway survey, followed by a soil vapor investigation to evaluate the potential risk associated with the vapor intrusion pathway. ACEH generally agrees with the scope of work as recommended in the work plan, provided the technical comments discussed below are addressed prior to the implementation of the work plan.

We request that you perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to steven.plunkett@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Site Characterization.** CRA has proposes a phased approach to evaluate subsurface conditions beneath and downgradient of your site. The first phase of the investigation is to assess the vertical and horizontal extent of petroleum hydrocarbon contamination in soil and groundwater. CRA recommends the installation of five onsite and three offsite soil borings. The proposed soil borings will augment the existing soil and groundwater analytical data, and thus provide a more detailed assessment of subsurface contamination. ACEH request that one additional boring must be installed approximately 20 to 30 east of the soil boring placed in front of parcel 411-39-8 (See Figure 3).

CRA recommends the installation of soil borings to a depth of 20 feet bgs. Considering soil samples were not collected below 11.5 feet bgs and strong hydrocarbon odor was detected in soil borings BH-B and BH-C at a depth of between 15 feet to 20 feet bgs; consequently, ACEH requests that soil sampling must be completed to 25 to 30 feet bgs. Thus, verifying the absence of TPH and TPH constituents in soil in the source area and downgradient of your site. ACEH agrees with the proposed soil sampling analysis as recommended by CRA. Please present the results from the soil and groundwater investigation (SWI) in the report requested below.

2. **Soil Vapor Investigation.** In a correspondence dated September 2007, ACEH previously requested that soil vapor sampling must be completed in order to evaluate the potential risk

associated with the vapor intrusion pathway. CRA has concurred with ACEH's request to evaluate the vapor intrusion pathway, concluding that a soil vapor investigation must be implemented once the first phase of the investigation has been completed. The assertion is that once the soil and groundwater investigation has been completed, CRA will be more capable of identifying areas impacted by petroleum hydrocarbon contamination, and thus recommend the best locations to site soil vapor sampling points. The phased approach to site investigation is acceptable. However, once the first phase of site characterization has been completed, ACEH requires that you prepare a work plan detailing your proposal to perform a soil vapor investigation. Please present the soil vapor work plan in the report requested below.

3. **Preferential Pathway Survey.** In conjunction with site characterization activities, ACEH requested a preferential pathway survey to evaluate if utility corridors or other conduits may be acting as a preferential pathway for contamination migration. ACEH agrees with the plan proposed by CRA to complete the preferential pathway survey. Please present the results from the preferential pathway survey in the SWI report requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Steven Plunkett), according to the following schedule:

- **March 1, 2008** – Soil and Groundwater Investigation and Preferential Pathway Survey
- **March 15, 2008** – Work Plan for Soil Vapor Investigation

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

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. 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 monitor wells, and other data to the Geotracker database over the Internet.

Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was 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).

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.

Should you have any questions, do not hesitate to call me at (510) 383-1767.

Sincerely,

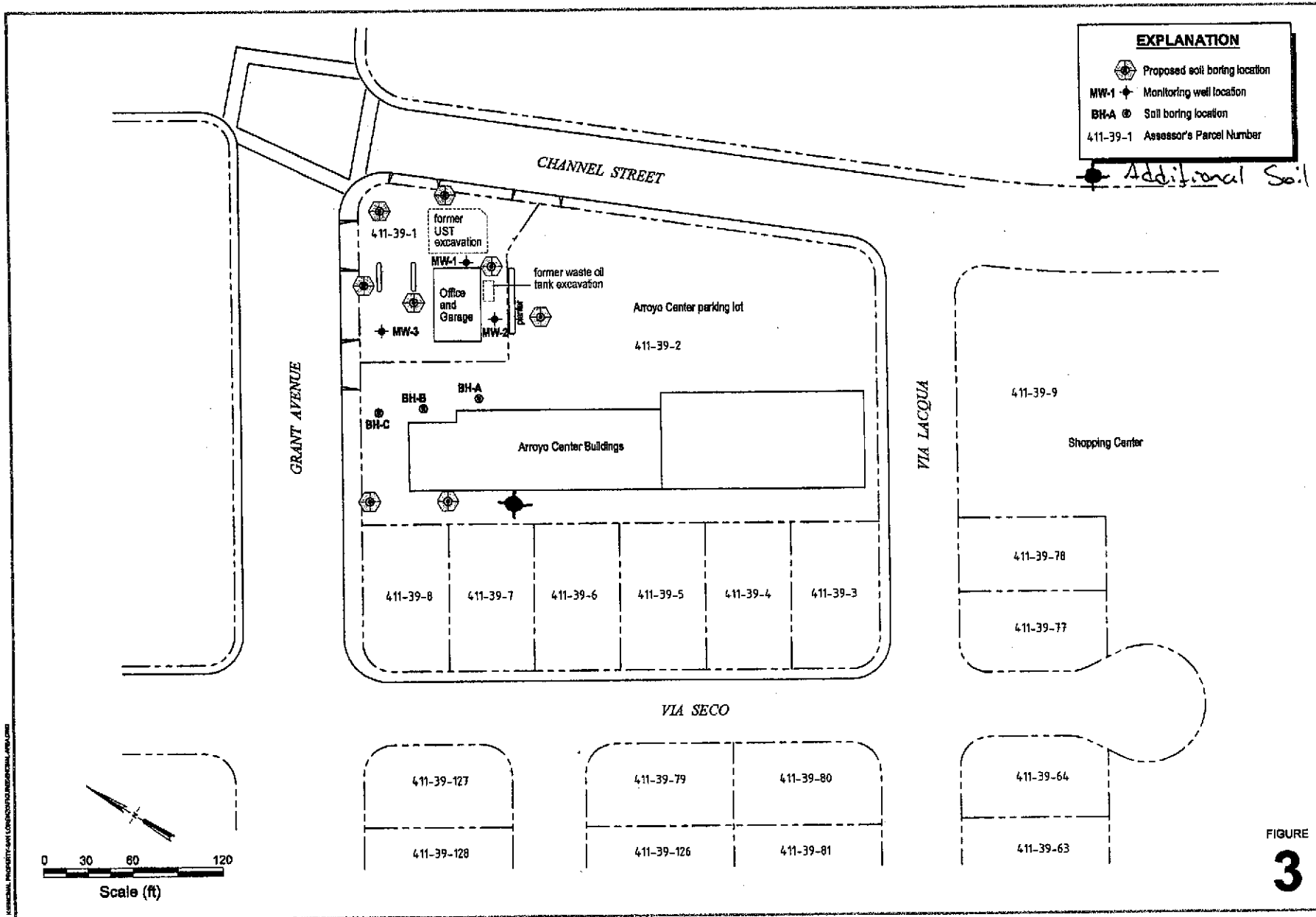


Steven Plunkett
Hazardous Materials Specialist

Mr. George Jaber
January 17, 2007
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cc: Brandon Wilken
Conestoga Rover Associates
5900 Hollis Street
Emeryville, Ca 94608

Donna Drogos, ACEH, Steven Plunkett, ACEH, File



Area Map



CAMBRIA

FIGURE
3

Olympic Service Station
1436 Grant Avenue
San Lorenzo, California