

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**  
AGENCY  
ALEX BRISCOE, Agency Director



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

October 5, 2015

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

Subject: Modified Approval of Work Plan and System Evaluation; Fuel Leak Case No. RO00000373  
Olympic Station (Global ID T0600102256), 1436 Grant Avenue, San Lorenzo, CA 94580

Dear Mr. Jaber:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Project Status and Groundwater Monitoring and Sampling Report*, dated, July 17, 2015 and the *Focused Site Conceptual Model and Work Plan for Additional Site Assessment and Expanded Water Supply Well Survey*, dated August 12, 2015. The reports were prepared and submitted on your behalf by Stratus Environmental, Inc. (Stratus). Thank you for submitting the reports.

The work plan proposed the installation of two shallow groundwater monitoring wells, MW-7A and MW-8A, to a depth of 12 feet below grade surface (bgs) and the installation of two soil vapor wells, SV-6 and SV-7, to a depth of 5.5 feet bgs in order to define the lateral extent of very shallow groundwater contamination and vapor concentrations downgradient and offsite from the subject property. Specifically, the wells are proposed to be installed to determine if there is a risk of vapor intrusion at the downgradient retail commercial strip mall. Recent groundwater concentrations up to 12,000 micrograms per liter ( $\mu\text{g/l}$ ) Total Petroleum Hydrocarbons as gasoline (TPHg) and 2,100  $\mu\text{g/l}$  benzene were documented immediately upgradient of the offsite strip mall. Depth to groundwater was recently approximately 6.8 feet bgs.

The referenced *Project Status and Groundwater Monitoring and Sampling Report* documents trace groundwater and trace vapor influent concentrations into the DPE system. System wells are installed in a deeper water-bearing zone than wells MW-5A, MW-6A, and also MW-4. It appears apparent that the system has reached asymptotic levels for deeper wells, and it is appropriate to initiate system cycling.

Based on ACEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org)) prior to the start of field activities.

### **TECHNICAL COMMENTS**

1. **Work Plan Modifications** – The referenced work plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests several modifications to the approach. Please submit a report by the date specified below.
  - a. **Location of Vapor Well SV-6** - In order to correlate vapor concentrations in proposed vapor well SV-6 more closely with groundwater concentrations documented in well MW-5A, it appears reasonable to place the proposed vapor well more closely downgradient of well MW-5A. As depicted the location of the vapor well appears to be more lateral (further south) than downgradient of the groundwater well.

- b. Vapor Sampling Protocols** – ACEH requests the vapor sampling protocols used at the site follow Department of Toxic Substances Control (DTSC) vapor guidance documents. Specifically, the referenced work plan indicates that 1,1-DFA will be utilized as a gas leak check compound, but did not specify the use of a shroud. This may be an unintended oversight; however, to preclude miscommunication, ACEH requests the use of a vapor sampling shroud any time a gaseous leak check compound is used. Because DTSC guidance also provides methods to validate a sample in the event that a tracer compound is detected in a vapor sample, ACEH additionally requests that shroud tracer concentrations be documented.
  - c. Naphthalene Analysis** – Please be aware that should Nylaflow tubing be used to collect vapor samples, DTSC guidelines indicate that naphthalene should additionally be analyzed for using standard laboratory method TO-17 (in addition to TO-15). This is due to the adsorption of naphthalene on to Nylaflow tubing during the sampling process.
  - d. Inclusion of Oxygen, Methane, Carbon Dioxide Vapor Analysis** – In order to validate and also fit the analytical data to be generated into the Low Threat Closure Policy, ACEH additionally requests the collection of oxygen, methane, and carbon dioxide in the vapor analytical suite at all vapor sampling locations.
- 2. DPE System Shut Down / Evaluation** - As noted above, it appears appropriate to shut the remedial system down in order to determine the potential for contaminant rebound at the site. Due to the potential of rebound to affect sensitive receptors (potential for vapor intrusion to commercial and residential buildings downgradient to the recent and proposed wells) please propose an appropriate monitoring schedule of environmental media (vapor and / or groundwater) in order to determine contaminant trends. ACEH anticipates that the monitoring interval will be at closer intervals initially. Please submit a Remediation Monitoring Work Plan by the date identified below.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below, according to the following schedule:

- **November 20, 2015** – System Evaluation / Remediation Monitoring Plan  
File to be named: RO373\_REM\_R\_yyyy-mm-dd
- **December 4, 2015** – Site Investigation Report  
File to be named: RO373\_SWI\_R\_yyyy-mm-dd
- **December 18, 2015** – Semi-Annual Groundwater Monitoring and, if required, Remedial Progress Report; File to be named RO373\_QMR\_REM\_R\_yyyy-mm-dd

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.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org).

Sincerely,

Mark E. Detterman, PG, CEG  
Senior Hazardous Materials Specialist

Mr. Phillip Jaber  
RO0000373  
October 5, 2015, Page 3

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations and  
Electronic Report Upload (ftp) Instructions

cc: Scott Bittinger, Stratus Environmental, Inc, 3330 Cameron Park Drive, Suite 550, Cameron Park,  
CA 95682 (sent via electronic mail to: [sbittinger@stratusinc.net](mailto:sbittinger@stratusinc.net))

Gowri Kowtha, Stratus Environmental, Inc, 3330 Cameron Park Drive, Suite 550, Cameron Park,  
CA 95682 (sent via electronic mail to: [gkowtha@stratusinc.net](mailto:gkowtha@stratusinc.net))

Dilan Roe, ACEH, (sent via electronic mail to [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))

Mark Detterman, ACEH, (sent via electronic mail to [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))

Electronic File, GeoTracker

## Attachment 1

### Responsible Party(ies) Legal Requirements / Obligations

#### REPORT REQUESTS

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.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)).

#### 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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> May 15, 2014
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

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

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- 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)

## 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 [deh.loptoxic@acgov.org](mailto:deh.loptoxic@acgov.org)
  - 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, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
  - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
  - 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 [deh.loptoxic@acgov.org](mailto:deh.loptoxic@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 @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) If site is a new case without an RO#, use the street address instead.
  - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.