



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

August 21, 2013

Lily A. Chun 1991 Trust
Carolyn C. Fong, Trustee
711 East Hermosa Drive
San Gabriel, CA 91775
(Sent via E-mail to: carolynfong1@sbcglobal.net)

Subject: CAP Approval for Public Comment for Fuel Leak Case No. RO0000382 and GeoTracker Global ID T0600100980, Bill Chun Service Station, 2301 Santa Clara Avenue, Alameda, CA 94501

To Lily A. Chun Trust:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including the documents entitled, "*First Semi-Annual 2013 Groundwater Monitoring Report, Bill Chun Service Station, 2301 Santa Clara Avenue, Alameda, CA 94501,*" dated May 29, 2012 (Monitoring Report) and "*Corrective Action Plan, Bill Chun Service Station, 2301 Santa Clara Avenue, Alameda, CA,*" dated August 1, 2013 (CAP). Both reports were prepared on your behalf by Ninyo & Moore.

The CAP presents results from soil, groundwater, soil vapor, sub-slab soil vapor, and indoor air sampling from on-site and off-site locations and evaluates remedial alternatives for the site. Groundwater Recirculation Enhanced Bioremediation is recommended in the CAP as the preferred remedial alternative.

The proposed Groundwater Recirculation Enhanced Remediation remedial alternative is acceptable for public comment and review. Public participation is a requirement for the Corrective Action Plan process and is required prior to implementation of the remedial alternative. In order to notify potentially affected members of the public of the proposed action, we request that you prepare and submit a Draft Fact Sheet similar in format to the attached document for ACEH review. The Draft Fact Sheet should briefly describe the site background and environmental conditions and describe the proposed remedial alternative. Upon request, ACEH will also provide an electronic version of the Fact Sheet in another format for ease of use. Please also provide a mailing list for ACEH review that includes residents and owners within 500 feet of the site and any other interested individuals, groups, or organizations that may have an interest in the site. We request that you submit the Draft Fact Sheet and a mailing list of interested persons **no later than October 9, 2013**.

Upon review and approval of the Fact Sheet and mailing list, ACEH will request that you distribute the Fact Sheet to the mailing list. Comments on the proposed alternative will be accepted for a 30-day period. ACEH will consider all comments from the public prior to approval of the proposed alternative.

Please continue groundwater monitoring on the established semi-annual schedule.

Lily A. Chun Trust
RO0000382
August 21, 2013
Page 2

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Jerry Wickham), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **October 9, 2013** – Draft Fact Sheet
File to be named: CAP_PP_L_yyyy-mm-dd RO382
- **January 15, 2014** – Semi-Annual Groundwater Monitoring Report
File to be named: GWM_R_yyyy-mm-dd RO0382

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 ST system, and require your compliance with this request.

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org. Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Sincerely,

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

Attachments: Fact Sheet Example
Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Kris Larson, Ninyo & Moore, 1956 Webster Street, Suite 400, Oakland, CA 94612 (*Sent via E-mail to: klarson@ninyoandmoore.com*)

Peter Sims, Ninyo & Moore, 1956 Webster Street, Suite 400, Oakland, CA 94612 (*Sent via E-mail to: psims@ninyoandmoore.com*)

Donna Drogos, ACEH (*Sent via E-mail to: donna.drogos@acgov.org*)
Jerry Wickham, ACEH (*Sent via E-mail to: jerry.wickham@acgov.org*)

GeoTracker, eFile



FACT SHEET ON ENVIRONMENTAL ASSESSMENT

UNOCAL#0843

1629 Webster Street, Alameda, CA 94501
Fuel Leak Case No. RO0000450 and
GeoTracker Global ID T0600102263

Site Remediation Summary

This fact sheet has been prepared to inform community members and other interested stakeholders regarding the status of a proposed soil and groundwater cleanup at the former ARCO located at 1629 Webster St., Alameda, California. Mr. Borgh, the lead responsible party for the fuel leak case is proposing ozone/oxygen injection and potential limited soil excavation as remediation technologies to cleanup the site.

Site Background

The site is located in the Webster Street commercial area of Alameda. It was previously operated as a Unocal gasoline station but is now currently a vacant lot. Plans to redevelop the property to senior housing with first floor commercial retail have been approved by the City of Alameda and await completion of remediation at the site.

Remediation Alternative: Ozone/oxygen Injection with Potential for Excavating Source Area Soils

Ozone/oxygen injection is proposed to remediate groundwater contaminated with MTBE at the site. The MTBE plume is located beneath the site at a depth of between 20 to 30 feet below ground surface (bgs). The proposed remediation will inject ozone into the plume which then reacts with the MTBE and forms carbon dioxide and water, thus destroying the MTBE. The proposal would include injecting ozone/oxygen at six different points located throughout the site for an estimated 3 to 6 months. Typically no additional infrastructure is needed to install this system.

Soil Excavation and Removal

The remediation proposal includes an evaluation of soil in the area of the former USTs. Soil borings would be advanced and samples collected to determine the extent of residual contamination. If contamination levels warrant, the soil will be excavated and removed from the site and disposed at an appropriate landfill.

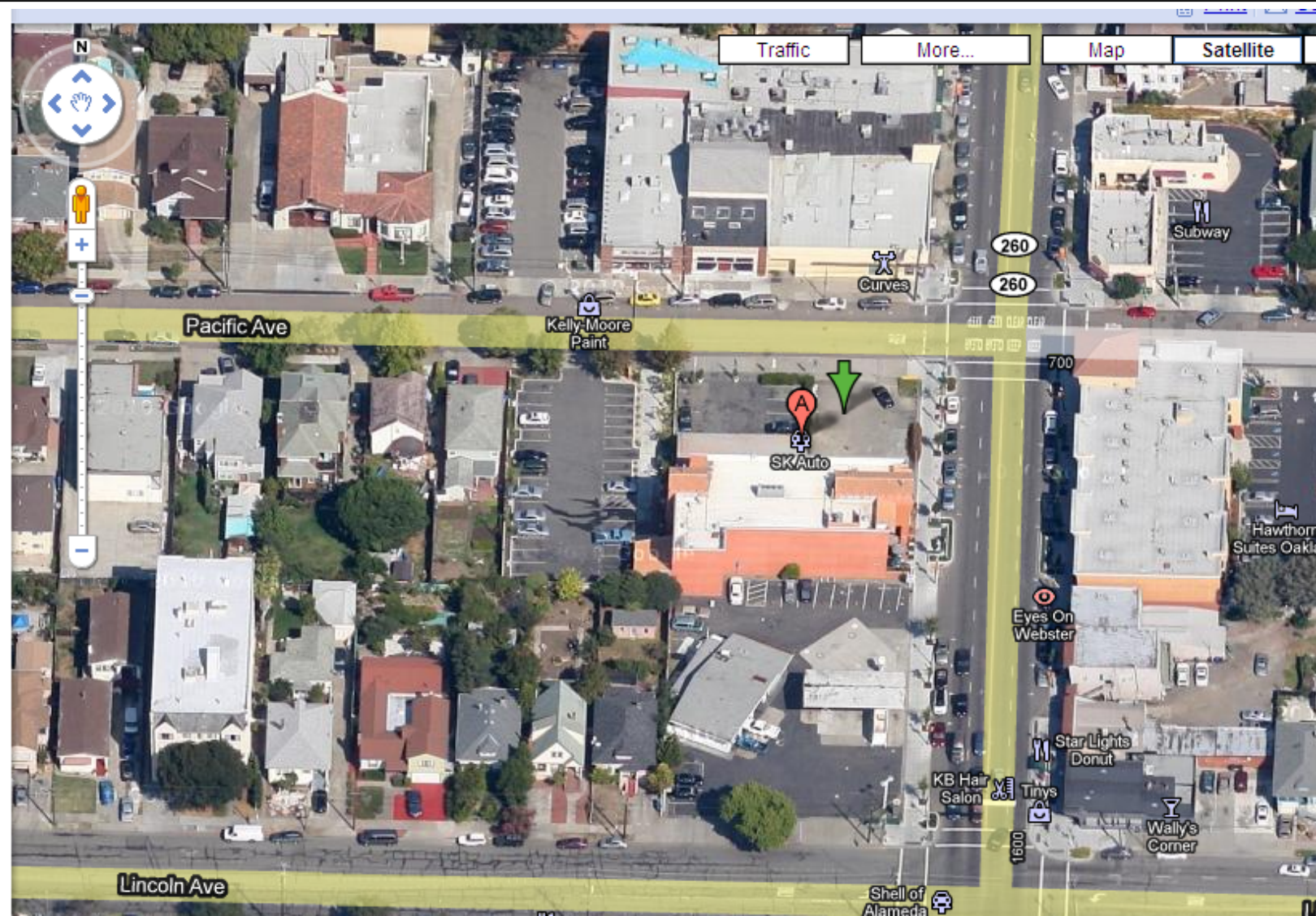
ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

Next Step

Mr. Borgh is working with Alameda County Environmental Health (ACEH) to implement a soil and groundwater cleanup at the site. The proposed alternative is described in the reports *Corrective Action Plan* dated April 7, 2010 and *Work Plan for Additional Assessment* dated August 24, 2010 prepared by Delta Consultants on behalf of Mr. Borgh. The public is invited to review and comment on the proposed cleanup action. The reports are available on ACEH's website (<http://www.acgov.org/aceh/lop/ust.htm>) or the State Water Resources Control Board's GeoTracker website (<http://www.geotracker.waterboards.ca.gov/>). The report and case file are also available for review at the ACEH located at 1131 Harbor Bay Parkway in Alameda, California. Please send a fax to 510-337-9335 to request a date and time to review the case file. Please send written comments regarding the corrective action to Barbara Jakub at the address below. All written comments received by **November 3, 2010** will be forwarded to the Responsible Party and will be considered and responded to prior to a final determination on the proposed cleanup.

For Additional information, please contact:

Barbara Jakub Alameda County Environmental Health 1131 Harbor Bay Parkway, Ste 250 Alameda, CA 94502 Phone: 510-639-1287 E-mail: barbara.jakub@acgov.org	James Barnard Delta Environmental, Inc. 11050 White Rock Rd., Suite 110 Rancho Cordova CA 95670 Phone: 916-503-1279 E-mail: jbarnard@deltaenv.com
---	---



Attachment 1

Responsible Party(ies) Legal Requirements/Obligations

REPORT/DATA REQUESTS

These reports/data are being requested pursuant to Division 7 of the California Water Code (Water Quality), Chapter 6.7 of Division 20 of the California Health and Safety Code (Underground Storage of Hazardous Substances), and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations (Underground Storage Tank Regulations).

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (Local Oversight Program [LOP] for unauthorized releases from petroleum Underground Storage Tanks [USTs], and Site Cleanup Program [SCP] for unauthorized releases of non-petroleum hazardous substances) require submission of reports in electronic format pursuant to Chapter 3 of Division 7, Sections 13195 and 13197.5 of the California Water Code, and Chapter 30, Articles 1 and 2, Sections 3890 to 3895 of Division 3 of Title 23 of the California Code of Regulations (23 CCR). Instructions for submission of electronic documents to the ACEH FTP site are provided on the attached "Electronic Report Upload Instructions."

Submission of reports to the ACEH FTP site is in addition to requirements for electronic submittal of information (ESI) to the State Water Resources Control Board's (SWRCB) Geotracker website. In April 2001, the SWRCB adopted 23 CCR, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1 (Electronic Submission of Laboratory Data for UST Reports). Article 12 required electronic submittal of analytical laboratory data submitted in a report to a regulatory agency (effective September 1, 2001), and surveyed locations (latitude, longitude and elevation) of groundwater monitoring wells (effective January 1, 2002) in Electronic Deliverable Format (EDF) to Geotracker. Article 12 was subsequently repealed in 2004 and replaced with Article 30 (Electronic Submittal of Information) which expanded the ESI requirements to include electronic submittal of any report or data required by a regulatory agency from a cleanup site. The expanded ESI submittal requirements for petroleum UST sites subject to the requirements of 23 CCR, Division, 3, Chapter 16, Article 11, became effective December 16, 2004. All other electronic submittals required pursuant to Chapter 30 became effective January 1, 2005. Please visit the SWRCB website for more information on these requirements. (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, 7835, 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, late 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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: July 25, 2012
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (petroleum UST and SCP) 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 .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 <://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 .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.