



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

July 28, 2008

Eileen Fanelli  
EBMUD  
375 South 11<sup>th</sup> Street  
Oakland, CA 94607

Subject: Fuel Leak Case No. RO0000449 and Geotracker Global ID T0600100495, EBMUD,  
2130 Adeline Street, Oakland, CA 94607

Dear Ms. Fanelli:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the document entitled, "Transmittal of AMC Phase II Construction Materials Management Final Report for EBMUD Adeline Maintenance Center," dated June 30, 1998, which was prepared by Geo Plexus Consultants for the subject site. The above-mentioned report summarizes over-excavation activities associated with the removal of six underground storage tanks (USTs) in 1994. According to our records, three different USTs were removed in 1987, which do not appear to have been part of the over-excavations conducted in 1997. Also, elevated concentrations of benzene appear to have been left in place at the site that appear to pose a risk to human health and the environment. Lastly, groundwater encountered during the over-excavations was pumped and disposed of off-site. However, no groundwater sampling to assess groundwater conditions was conducted.

ACEH requests that you address the following technical comments and send us the technical reports and work plan requested below.

#### **TECHNICAL COMMENTS**

1. **UST Removals in 1987** – According to our records, three USTs were removed from the subject site in 1987. Total petroleum hydrocarbons (TPH) as gasoline (g) and benzene were detected in the soil at concentrations of 460 mg/kg and 15 mg/kg, respective. Based on the elevated concentrations detected in soil samples, our directive letters dated February 18, 1988 and August 2, 1988, requested that a groundwater investigation be conducted. On August 24, 1988, Walter Bishop with EBMUD sent ACEH a correspondence stating that EBMUD is obtaining contractor's bids to conduct the groundwater investigation. To date, a groundwater investigation work plan has not been received and the extent of soil and groundwater appear uncharacterized. At this time, please propose a scope of work to address the above-mentioned concerns and submit a site investigation work plan due by the date specified below.

2. **UST Removals in 1994** – According to our records, six USTs were removed from the subject site in 1994. A UST removal report was not available in our file. In 1997, over-excavations were conducted to remove hydrocarbon impacted soil identified during UST compliance soil sampling. Residual benzene concentrations have been detected as high as 4.1 mg/kg in soil sample 20HOX1-S1 indicating that the site is not adequately characterized and may pose a potential risk to human health and the environment. In addition, groundwater encountered during the over-excavations was pumped and disposed of off-site. However, no groundwater sampling was conducted to assess groundwater conditions. Please propose a scope of work to address the above-mentioned concerns and submit a work plan due by the date specified below.
  
3. **Site Conceptual Model** – At this juncture, it may be advantageous to develop a site conceptual model (SCM), which synthesizes all the analytical data and evaluates all potential exposure pathways and potential receptors that may exist at the site, including identifying or developing site cleanup objectives and goals. At a minimum, the SCM should include:
  - (1) Local and regional plan view maps that illustrate the location of sources (former facilities, piping, tanks, etc.) extent of contamination, direction and rate of groundwater flow, potential preferential pathways, and locations of receptors;
  - (2) Geologic cross section maps that illustrate subsurface features, man-made conduits, and lateral and vertical extent of contamination;
  - (3) Plots of chemical concentrations versus time;
  - (4) Plots of chemical concentrations versus distance from the source;
  - (5) Summary tables of chemical concentrations in different media (i.e. soil, groundwater, and soil vapor); and
  - (6) Well logs, boring logs, and well survey maps;
  - (7) Discussion of likely contaminant fate and transport.

If data gaps (i.e. evaluation of groundwater, potential contaminant volatilization to indoor, or air contaminant migration along preferential pathways, etc.) are identified in the SCM, please include a proposed scope of work to address those data gaps in the work plan due by the date specified below. Please note that the work plan must address all technical comments presented in this correspondence and all data gaps identified in the SCM.

#### **REQUEST FOR INFORMATION**

ACEH's case file for the subject site contains the following reports:

- *Final Report Removal of fuel Storage Tanks* dated December 14, 1987

- *Final Report – Two Underground Storage Tanks Removed from Sites Located at West Grand and Linden Streets* dated July 7, 1988
- *Addendum No. # to Materials Management Plan for EBMUD Adeline Maintenance Facility* dated June 15, 1998
- *Transmittal of AMC Phase II Construction materials Management Final Report for EBMUD Adeline Maintenance Center* dated June 30, 1998

You are requested to submit copies of all other reports related to environmental investigations for this property (including Phase I and Phase II reports) by **August 28, 2008**.

#### **TECHNICAL REPORT REQUEST**

Please submit technical reports and work plans to Alameda County Environmental Health (Attention: Paresh Khatri), according to the following schedule:

- **September 26, 2008** – SCM & Data Gap Work Plan

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.swrcb.ca.gov/ust/electronic\\_submittal/report\\_rqmts.shtml](http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml)).

**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**

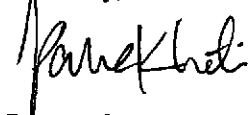
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

**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.

If you have any questions, please call me at (510) 777-2478 or send me an electronic mail message at [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org).

Sincerely,



Paresh C. Khatri  
Hazardous Materials Specialist



Donna L. Drogos, PE  
Supervising Hazardous Materials Specialist

Ms. Fanelli  
RO0000449  
July 28, 2008, Page 5

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA  
94612-2032  
Donna Drogos, ACEH  
Paresh Khatri, ACEH  
File

<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)