



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

February 17, 2011

Mr. Mohammad Pazdel
1770 Pistacia Court
Fairfield, CA 94533

Mr. Hamid Khatirine
c/o Mr. Michael D. Liberty
3713 Century Drive
Campbell, CA 95008-3832

Subject: Fuel Leak Case No. RO0000473 and GeoTracker Global ID T0600191157, ARCO,
15101 Freedom Avenue, San Leandro, CA 94578

Dear Mr. Pazdel and Mr. Khatirine:

Thank you for the recently submitted document entitled, "Freedom Food and Gas (Formerly Freedom ARCO Mini-Mart," dated January 20, 2011, which was prepared by SOMA Environmental Engineering, Inc. for the subject site. Alameda County Environmental Health (ACEH) staff has reviewed the case file including the above-mentioned report for the above-referenced site. SOMA is currently operating a groundwater pump and treat system to "execute hydraulic control of the dissolved plume and remediate residual hydrocarbon concentrations," as well as operating a mobile DPE unit at the site. SOMA states that the highest concentrations of petroleum hydrocarbons are currently detected in off-site monitoring well MW-6. To that end, SOMA recommends continuing quarterly groundwater monitoring, continuing groundwater pump and treat operation, extending the DPE operation from five days per event to ten days per event, and to conduct an off-site investigation to evaluate possible off-site sources of contamination at MW-6 and convert MW-6 into an extraction well, based on the results of the investigation.

ACEH generally concurs with quarterly monitoring and increasing the duration of the DPE events from five days to ten days per event. However, ACEH has some concerns regarding the groundwater pump and treat system and identifying a potential off-site source and requests that you address the following technical comments, and send us the work plan described below.

TECHNICAL COMMENTS

1. **Groundwater Pump and Treat System** – SOMA recommends continuing operation of the groundwater pump and treat system at the site to maintain hydraulic control. At one time, the extent of the groundwater contaminant plume spanned several blocks and impacted many

backyard water wells. Initiating the groundwater pump and treat system to gain hydraulic control appeared appropriate at that time. However, currently the groundwater contaminant plume appears to be stable perhaps due to a combination of pump and treat and DPE and SOMA has not adequately justified the benefit of continued groundwater pump and treat operation in conjunction with the proposed increase in DPE operation. Should pump & treat operation still be desired, please justify the necessity and outline the benefit of continued pump and treat operation and submit a work plan due by the date specified below.

2. **Off-site Source Investigation** – SOMA identified off-site monitoring well MW-6 as detecting the highest hydrocarbon concentrations detected in groundwater at the site. Consequently, SOMA recommends conducting an off-site investigation to identify a potential off-site source and based on the results of the investigation, possibly convert monitoring well MW-6 to an extraction well and connect it to the DPE well network. ACEH understands that an extensive groundwater contaminant plume resulted from unauthorized release(s) from the site and MW-6 appears to be located down-gradient of the site, including a dispenser island and the current USTs. Therefore, it would not be unreasonable to assume that the off-site contamination detected in MW-6 is related to the unauthorized release(s) and/or past site activities that occurred at the site. This appears more evident considering that the surrounding land-use consists mostly of single family homes and one small shopping plaza. Conducting an off-site investigation to determine the extent of contamination in the vicinity of MW-6 would appear more reasonable than conducting an off-site investigation to attribute the contamination to a potential off-site source. Prior to proposing a scope of work to determine an off-site source, please provide sufficient evidence to justify the possibility that such an off-site source (i.e. former gas stations, USTs, etc.) exists. Otherwise, you may propose a scope of work to determine the extent of groundwater contamination in the vicinity of MW-6 so that adequate extraction points in the vicinity can be evaluation. Please submit a scope of work to address the above-mentioned concerns and submit a work plan due by the date specified below.

NOTIFICATION OF FIELDWORK ACTIVITIES

Please schedule and complete the fieldwork activities by the date specified below and provide ACEH with at least three (3) business days notification prior to conducting the fieldwork, including routine groundwater sampling.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Paresh Khatri), according to the following schedule:

- **April 18, 2011** – Soil and Water Investigation Work Plan
- **Due within 30 Days of Sampling** – Quarterly Monitoring Report (2nd Quarter 2011)
- **Due within 30 Days of Sampling** – Quarterly Monitoring Report (3rd Quarter 2011)

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- **Due within 30 Days of Sampling** – Quarterly Monitoring Report (4th Quarter 2011)
- **Due within 30 Days of Sampling** – Quarterly Monitoring Report (1st Quarter 2012)

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 777-2478 or send me an electronic mail message at paresh.khatri@acgov.org.

Sincerely,

Paresh C. Khatri
Hazardous Materials Specialist

Enclosure: Responsible Party(ies) Legal Requirements/Obligations
ACEH Electronic Report Upload (ftp) Instructions

cc: Mansour Sepehr, SOMA Environmental Engineering, 6620 Owens Dr., Ste A,
Pleasanton, CA 94588 (*Sent via E-mail to: msepehr@somaenv.com*)
Donna Drogos, ACEH (*Sent via E-mail to: donna.drogos@acgov.org*)
Paresh Khatri, ACEH (*Sent via E-mail to: paresh.khatri@acgov.org*)
GeoTracker
File

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.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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: July 20, 2010
	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 (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 dehloptoxic@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.
 - 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 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 @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.