



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
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October 29, 2014

Mr. Farrokh Hosseinvoun
(Sent via E-mail to: farok@fhone.net)

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: Request for Additional Modified MPE Events; Fuel Leak Case No. RO0000473 and GeoTracker Global ID T0600191157, ARCO, 15101 Freedom Avenue, San Leandro, CA 94578

Dear Messrs. Hosseinvoun, Pazdel, and Khatirine:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Air Injection Pilot Testing and MPE Progress Report*, dated August 29, 2014, the *Installation of Off-Site Monitoring Wells, Additional Vapor Sampling, and MPE Event*, dated October 16, 2014, and the *Third Quarter 2014 Groundwater Monitoring and Remediation Progress Report*, dated October 24, 2014. The reports were prepared and submitted on your behalf by SOMA Environmental Engineering, Inc. Thank you for submitting the reports.

The referenced pilot testing report documented the recent Multi-Phased Extraction (MPE) event and a vadose zone air injection pilot test designed to enhance the recovery of volatile hydrocarbons from beneath the site. As a result of the pilot test, SOMA proposed to inject air into vadose zone sediments at up to 100 pounds per square inch (psi) into wells near existing extraction wells.

The referenced site investigation report documented the installation of groundwater monitoring wells MW-10 and MW-11, an additional crawl space vapor investigation, and included additional information on the MPE event. Well MW-12 could not be installed as planned due to the presence of multiple subsurface utilities at the location.

The referenced groundwater monitoring report documented the quarterly sampling and analysis of groundwater. Contaminant concentrations in well MW-10 were up to 23,000 micrograms per liter ($\mu\text{g/l}$) Total Petroleum Hydrocarbons as gasoline (TPHg), $<10 \mu\text{g/l}$ benzene, $1,200 \mu\text{g/l}$ ethylbenzene, and $<0.5 \mu\text{g/l}$ methyl tert butyl ether (MTBE). In general contaminant concentrations and Light Non-Aqueous Phased Liquids (LNAPL) thicknesses were not present in several on and offsite wells with generally persistent recent LNAPL. This was attributed to recent MPE and modified, by air injection into the vadose zone, MPE events.

Based on the review of the case file ACEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

- 1. Request for Additional MPE Events Modified by Air Injection** – With one condition, ACEH is in general agreement with the recommended modification of MPE at the site by the additional of injected air to enhance recovery of volatile hydrocarbon compounds from beneath the site and vicinity. Due to the presence of a thick section of clay beneath the site (a minimum of approximately 12 feet, up to 20 plus feet) ACEH does not anticipate significant risk to adjacent residential housing stock; however, to

determine the validity of this assumption, ACEH requests the collection of an additional crawl space and ambient air vapor sample during an additional MPE air injection event. Please submit a Remedial Progress Reports by the dates requested below.

- 2. Groundwater Monitoring** – Please continue with quarterly groundwater monitoring at the subject site due to fluctuating groundwater contaminant concentrations and the recent presence of LNAPL in several wells at and, at least 100 feet, downgradient of the site. Depending on remedial progress at the site, as documented in part by groundwater concentrations, continued groundwater monitoring will additionally begin to document the potential for contaminant rebound in a post-MPE period at the site. Please submit reports by the dates 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:

- **January 31, 2015** – Fourth Quarter 2014 Groundwater Monitoring and Remedial Progress Report
File to be named RO473_GWM_REM_R_YYYY-mm-dd
- **May 1, 2015** – First Quarter 2014 Groundwater Monitoring and Remedial Progress Report
File to be named: RO473_WP_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.

Sincerely,

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

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations and 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)

Dilan Roe, ACEH (Sent via E-mail to: dilan.roe@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/).

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: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 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 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 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.