



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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October 28, 2015

Mr. Farrokh Hosseinvoun  
(Sent via E-mail to: [farok@fhone.net](mailto: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 Work Plan and 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 *Third Quarter 2015 Groundwater Monitoring and Remediation Progress Report*, dated October 13, 2015. The report was prepared and submitted on your behalf by SOMA Environmental Engineering, Inc. Thank you for submitting the report.

The referenced groundwater monitoring report documented the quarterly sampling and analysis of groundwater. A significantly increasing contaminant trend, which may be partly seasonal, was documented in well MW-10 where concentrations up to 28,000 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  $<10 \mu\text{g/l}$  methyl tert butyl ether (MTBE) were reported. Concentrations up to  $24,000 \mu\text{g/l}$  TPHg (June 2015) have previously been documented at the well; however, concentrations were also recently  $3,500 \mu\text{g/l}$  (March 2015). The *Technical Justification for Vapor Intrusion - Media Specific Criteria*, (March 2012), for the Low Threat Closure Policy (LTCP), indicates that concentrations of TPHg in groundwater over  $20,000 \mu\text{g/l}$  is indirect evidence of the presence of Liquid Non-Aqueous Phased Liquids (LNAPL) in groundwater.

Figures in the referenced report also appears to indicate the detaching of the TPH plume, and potentially a mobile LNAPL plume, from the site and contamination located beneath the site due to the apparent success of previous Multi-Phase Extraction (MPE) events on and offsite.

Therefore, 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 Work Plan** – The downgradient extent of the TPH and LNAPL plumes have not been defined at a location (MW-10) approximately 200 feet downgradient from the site. It appears appropriate to define the TPH and LNAPL plumes in accordance with the LTCP. This is anticipated to be protective of an existing downgradient offsite private water supply well previously identified in the vicinity.
- 2. Request for Additional MPE Events** – It appears appropriate to conduct additional on- and offsite MPE events. This is requested to include well MW-10 as recommended in the referenced report. If alternative LNAPL extraction methods are required due to the significant distance to well MW-10, ACEH requests the alternative methods be included in the work plan requested in Technical

Comment 1 above. Please submit the work plan and remedial progress reports by the dates requested below.

As previously discussed in the October 29, 2014 directive letter, with one condition, ACEH is in general agreement with the previous 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 requested the collection of an additional crawl space and ambient air vapor sample during any additional MPE air injection events.

3. **Groundwater Monitoring** – ACEH is in agreement with the recommendation to discontinue the monitoring of the second water bearing zone beneath the site and vicinity. There are multiple years of non-detectable concentrations in wells installed in the second water bearing zone. Otherwise, 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 200 feet (well MW-10), 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 15, 2016** – Work Plan  
File to be named RO473\_WP\_R\_YYYY-mm-dd
- **February 1, 2016** - Fourth Quarter 2015 Groundwater Monitoring and Remedial Progress Report  
File to be named RO473\_GWM\_REM\_R\_YYYY-mm-dd
- **May 2, 2016** – First Quarter 2015 Groundwater Monitoring and Remedial Progress Report  
File to be named: RO473\_GWM\_REM\_R\_YYYY-mm-dd
- **60 Days After Work Plan Approval** – Soil and Water Investigation Report  
File to be named RO473\_SWI\_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

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

Messrs. Hosseinvoun, Pazdel, and Khatirine  
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cc: Mansour Sepehr, SOMA Environmental Engineering, 6620 Owens Dr., Ste A,  
Pleasanton, CA 94588 (Sent via E-mail to: [msepehr@somaenv.com](mailto:msepehr@somaenv.com))

Dilan Roe, ACEH (Sent via E-mail to: [dilan.roe@acgov.org](mailto: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/](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.