



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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July 9, 2009

(Paul Supple (Sent via E-mail to: paul.supple@bp.com)
Atlantic Richfield Company
(A BP Affiliated Company)
P.O. Box 1257
San Ramon, CA 94583

Subject: Fuel Leak Case No. RO0000494 and GeoTracker Global ID T0600101764, ARCO
#2111, 1156 Davis Street, San Leandro, CA 94577

Dear Mr. Supple:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Response To Request For Site Conceptual Model and Soil & Ground-Water Investigation Work Plan," dated June 23, 2009, which was prepared by Broadbent & Associates, Inc. (BAI) for the subject site. In our April 24, 2009 correspondence, ACEH noted that elevated concentrations of hydrocarbons were detected in a "grab" groundwater sample collected in March 2004 from boring H-2, in which a permeable sand unit was identified between 15 to 20 feet bgs. A permeable unit was also identified in MW-7 from approximately 20 feet bgs to its total installed depth of 35 feet bgs. BAI states that "[f]rom review of the available lithologic logs and resultant cross sections, we do not believe the permeable unit (identified as Clayey Sand at MW-7) extends to the H-2 location. Furthermore, the URS cross section C-C' (Figure 4 of the 6 May 2004 report) does not connect the 29-foot deep, two foot thick well-graded Sand (SW) at SB-2 with the much shallower 16-foot deep, four foot thick well-graded sand (SW) found at the boring H-2 location." BAI further states that "[t]o verify or refute this lack of continuity depicted by URS might require additional drilling of multiple borings in the area north of the First Christian Church Community Center building. To extend this level of investigation does not appear to be justified as one may, or may not discover a reliable conclusion of a preferential pathway between the MW-7, SB-2 and H-2 locations."

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

TECHNICAL COMMENTS

1. **Regional Geologic and Hydrogeologic Setting** – As mentioned above, in our April 24, 2009 correspondence, ACEH stated that elevated concentrations of petroleum hydrocarbons were detected in a "grab" groundwater sample collected in March 2004 from boring H-2, in which a permeable sand unit was identified between 15 to 20 feet bgs. ACEH does not dispute BAI's technical rationale for why they believe the permeable layer identified at MW-7 located on-site does not extend to boring H-2 located off-site. However, ACEH's primary concern is that contaminants may be migrating further off-site through this permeable zone.

BAI did not provide any rationale for why significantly elevated concentrations of TPH-g and MTBE detected at 260,000 µg/L and 7,600 µg/L), respectively, in a “grab” groundwater sample collected from boring H-2 located offsite, if the permeable layer encountered in boring H-2 is not connected in some way to the permeable layer identified at MW-7, located near the source area. Please note that during that same timeframe, groundwater samples collected from monitoring well MW-5 detected TPH-g and MTBE at concentrations of 8,000 µg/L and 2,000 µg/L, respectively, and the highest concentrations of TPH-g and MTBE on-site were detected in well MW-7 at concentrations of 62,000 µg/L and 37,000 µg/L, respectively. Based on the analytical data, the extent of the groundwater contaminant plume appears undefined and a permanent monitoring point in the vicinity of boring H-2 appears warranted in addition to proposed groundwater monitoring wells MW-9 and MW-10. Please propose a scope of work to address the above-mentioned concerns and submit a work plan due by the date specified below. The need for additional boring locations to evaluate the potential for groundwater contaminant migration along preferential pathways (i.e. contaminant flow through permeable zones on and off-site) may be required based on current groundwater contaminant data collected in the immediate vicinity of boring H-2.

2. **Extended Site Figures** - Please note that the figures included in submittals provided to date are insufficient to adequately depict the extent of your contaminant plume in relation to adjacent and neighboring properties. Please prepare extended site maps, which utilize aerial photographs as base maps for your site, and accurately depict neighboring structures and site features in relation to the groundwater contaminant plume in all future reports.

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:

- **July 30, 2009** – Remediation Summary Report (2nd Quarter 2009)
- **August 31, 2009** – Soil and Water Investigation Work Plan
- **October 30, 2009** – Semi-annual Monitoring & Remediation Summary Report (3rd Quarter 2009)
- **January 30, 2010** – Remediation Summary Report (4th Quarter 2009)
- **April 30, 2010** – Semi-annual Monitoring & Remediation Summary Report (1st Quarter 2010)

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.

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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.

Sincerely,

Paresh C. Khatri
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Tom Venus, Broadbent & Associates, 1324 Mangrove Avenue, Suite 212, Chico, CA 95926
(Sent via E-mail to: tvenus@broadbentinc.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

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: March 27, 2009
	PREVIOUS REVISIONS: December 16, 2005, October 31, 2005
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

- 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
Or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of My Le Huynh.
 - 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 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.