

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



Alameda County

DEC 15 2005

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

December 9, 2005

Mr. Jeffrey Baker  
Tesoro Petroleum Companies, Inc.  
3450 S. 344<sup>th</sup> Way, Ste. 100  
Auburn, WA 98001-5931

Douglas Oil Company of California  
P.O. Box 1267  
Ponca City, OK 74603

Mr. Sam Hirrod  
Hirrod Enterprises  
111 Deerwood Road, Suite 110  
San Ramon, CA 94583

Subject: Fuel Leak Case No. RO0000498, Beacon #721, 44 Lewelling Blvd., San Lorenzo, CA

Dear Mr. Baker:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the documents entitled, "Quarterly Monitoring Report and Remediation Status Report, Third Quarter 2005," dated November 10, 2005, "Ozone Sparge Well Installation Work Plan," dated November 24, 2004, and "Recovery Well Installation Results Report," dated November 3, 2004. ACEH also reviewed the Site Conceptual Model, which is available at the project internet web site. The "Quarterly Monitoring Report and Remediation Status Report, Third Quarter 2005," includes results of quarterly groundwater monitoring and presents conclusions and recommendations for future actions.

Based on our review of these documents and the case file, we request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

**TECHNICAL COMMENTS**

1. **Site Conceptual Model.** The Site Conceptual Model (SCM) on the project internet web site is a useful resource for review of the site. We encourage you to periodically update the SCM as additional results become available.
2. **Ozone Sparge Well Installation.** ACEH concurs with the proposal in the "Ozone Sparge Well Installation Work Plan," to install three ozone sparge wells along the western boundary of the property. The Work Plan indicates that soil samples will be collected every five feet for logging purposes. ACEH requests that soil samples be collected continuously for logging purposes in order to provide better definition of soil conditions. Previous borings at the site have been sampled at five-foot intervals and have shown significant differences between adjacent borings. We have no objection to screening the soil samples to make decisions regarding submitting soil samples for laboratory analyses. However, we request that soil samples be submitted for laboratory analyses for all depth intervals where staining, odor, or elevated PID readings are observed. If staining, odor, or elevated PID readings are

observed over an interval of several feet, a sufficient number of soil samples from this interval should be submitted for laboratory analyses to characterize the fuel hydrocarbon concentrations within this interval. We concur with the proposed analyses but request that ethanol also be included as an analyte. Please include these results in the Quarterly Monitoring and Remediation Status Report for the First Quarter 2006.

3. **Addition of Ozone Generator.** The proposed addition of an ozone generator to the air sparging system as proposed in the "Quarterly Monitoring Report and Remediation Status Report, Third Quarter 2005," is acceptable.
4. **Expansion of Groundwater Extraction System.** ACEH concurs with the proposed addition of recovery wells MW-3R and RW-2 to the groundwater extraction system. ACEH has no objections to the equipment modifications proposed for the soil vapor extraction blower and air sparging compressor. Please provide information regarding these modifications in the Quarterly Monitoring and Remediation Status Reports.
5. **Plume Delineation.** The plume of dissolved fuel hydrocarbons originating from the site has not been sufficiently defined laterally and vertically. The two monitoring wells within the downgradient portion of the plume, MW-10 and MW-11, do not provide sufficient plume delineation, particularly given the heterogeneous hydrogeologic conditions encountered in the area. In addition, well MW-10 appears to be screened within a different soil unit than well MW-11. Please consider the collection of detailed lithologic information using soil borings, direct push sampling, and/or cone penetrometer to better define the hydrogeology of the site along with the use of depth-discrete groundwater samples collected along transects to characterize the site prior to installation of monitoring wells. We request that you plot the detailed lithologic information and analytical data on hydrogeologic cross sections to determine the appropriate locations and designs for monitoring wells/well clusters that are needed to characterize the three-dimensional extent of soil and groundwater contamination at the site. Please include your plans for plume delineation in the Work Plan requested below.
6. **Updated Well Survey.** The previous well survey for the site was presented in a report entitled "Problem Assessment Report," dated November 22, 1989. The well survey did not include well construction details and did not identify the two irrigation wells on Via Cordoba. ACEH requests that you conduct a current well survey to locate all wells (monitoring and water supply wells: active, inactive, standby, decommissioned, and abandoned wells) within a 2,000-foot radius of the site. Submittal of maps showing the location of all wells identified in your study, and the use of tables to report the data collected as part of your survey are required. We recommend that you obtain well information from the Alameda County Public Works Agency and State of California Department of Water Resources, at a minimum. Please include an analysis and interpretation of your findings, and report your results in the Work Plan requested below.
7. **Utility Survey.** We request that you complete the utility survey for the site and evaluate whether any underground utilities could potentially act as preferential pathways for contaminant migrations. Please show the locations of utilities that may act as preferential pathways along with the high and low depths to groundwater on cross sections.

8. **Groundwater Monitoring.** Please continue quarterly groundwater monitoring and present the results in the reports requested below. ACEH requests that ethanol be included as an analyte for the on-site monitoring wells in addition to the current analytes. In addition, the irrigation wells at 15800 and 15808 Via Cordoba are to be sampled on a semi-annual basis and the results presented in the groundwater monitoring reports requested below.

#### **TECHNICAL REPORT REQUEST**

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **February 15, 2006** – Quarterly Monitoring and Remediation Status Report for the Fourth Quarter 2005
- **February 27, 2006** – Work Plan for Site Characterization
- **May 15, 2006** – Quarterly Monitoring and Remediation Status Report for the First Quarter 2006
- **August 15, 2006** – Quarterly Monitoring and Remediation Status Report for the Second Quarter 2006

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) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy 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 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, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

**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) 567-6791.

Sincerely,



Jerry Wickham  
Hazardous Materials Specialist

Mr. Jeffrey Baker  
December 9, 2005  
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Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Richard Munsch  
RDM Environmental  
1704 Via Riata  
Roseville, CA 95747

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

**Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)**  
**Electronic Report Upload (ftp) Instructions**

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. This e-government initiative is aimed at making our programs more effective and efficient. The electronic copy is intended to replace the need for a paper copy and is expected to be relied upon for all public information requests, regulatory review, and compliance/enforcement activities.

**REQUIREMENTS**

- Entire report including cover letter must be submitted as a **single portable document format (PDF) with no password protection**. (If you cannot submit in PDF format, please check with us to see if we can accommodate your report format).
- 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 **should** be included and **must** have either original or electronic signature. Alternatively, the paper copy of the signature page and perjury statement can be mailed separately.
- **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**. If you cannot comply with this you may continue to submit paper documents.
- 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:
  - Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
    - a) Send an e-mail to [dehloptoxic@acgov.org](mailto:dehloptoxic@acgov.org)  
or
    - b) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
  - 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**.
  - Note: Both the User Name and Password are Case Sensitive.
2. Upload Files to the ftp Site
  - a) Using Internet Explorer (IE4+) or equivalent browser, go to <ftp://alcoftp1.acgov.org>
  - 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)



ALAMEDA COUNTY  
**HEALTH CARE SERVICES AGENCY**  
 Environmental Health Services Administration  
 1131 Harbor Bay Parkway, Suite 250  
 Alameda, CA 94502-6577

RO498



Mr. Sam Hirbod  
 Hirbod Enterprises  
 111 Deerwood Road Suite 110  
 San Ramon, CA 94583

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RETURN TO SENDER  
 NOT DELIVERABLE AS ADDRESSED  
 UNABLE TO FORWARD

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