

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**  
AGENCY  
DAVID J. KEARS, Agency Director



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

October 3, 2008

Normita Callison  
Corporate Environmental Specialist  
Pacific Coast Companies, Inc.  
5550 Roseville Road  
North Highlands, CA 95660

Subject: Fuel Leak Case No. RO0000514 and Geotracker Global ID T0600101039, Pacific Supply, 1735 24<sup>th</sup> Street, Oakland, CA 94607

Dear Ms. Callison:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Groundwater Monitoring Report," dated September 30, 2008 and the "Soil Parameters and Confirmation Soil Sampling Investigation Report," dated January 31, 2005, which were both prepared by Brunsing Associates, Inc. (BAI) for the subject site. In circa 1988, a 1,000-gallon underground storage tank (UST) was removed from the site with groundwater monitoring wells subsequently installed. Elevated concentrations of petroleum hydrocarbons were detected in soil and groundwater samples collected at the site. Consequently, a soil vapor extraction (SVE) system was installed and began operation on December 27, 1993. The SVE system ceased operation on June 28, 1996 due to OSHA and BAAQMD non-compliance. BAI estimates that the SVE system removed 6,550 pounds of petroleum hydrocarbons from the subsurface and discharged approximately 151,089-gallons of water to the sanitary sewer. More recently, BAI conducted a preferential pathway evaluation in January 2004 and in January 2005, collected confirmation soil samples to verify remediation system effectiveness. Soil sample analytical results detected total petroleum hydrocarbons (TPH) as gasoline (g), toluene, and xylenes at concentrations of 5,700 mg/kg, 54 mg/kg, and 53 mg/kg, respectively. BAI states that the concentrations of contaminants are below the Oakland Guidance Tier 2 SSTLs and has requested case closure for the subject site. Although the concentrations of contaminants are below Oakland's SSTLs, the concentrations are significantly above the Regional Water Quality Control Board's (RWQCB) Environmental Screening Levels. Since ACEH's Local Oversight Program (LOP) functions under the RWQCB's guidance and the LOP oversees remediation cases throughout the County, including in the City of Oakland, comparison of site concentrations must be made to the RWQCB ESLs in absence of calculated site-specific remediation goals. Therefore, case closure cannot be considered for the site at this time since the site appears to pose a risk to human health and the environment. This decision to deny closure is subject to appeal to the State Water Resources Control Board (SWRCB), pursuant to Section 25299.39.2(b) of the Health and Safety Code (Thompson-Richter Underground Storage Tank Reform Act - Senate Bill 562). Please contact the SWRCB Underground Storage Tank Program at (916) 341-5851 for information regarding the appeal process.

ACEH requests that you address the following technical comments and send us the technical reports requested below.

## **TECHNICAL COMMENTS**

1. **Preferential Pathway Study** – Depth to groundwater at the site has been reported to be as shallow as 3.7 feet below the ground surface (bgs) measured in monitoring well MW-6 on March 8, 1995. Since groundwater is relatively shallow at the site, a preferential pathway evaluation was requested and performed by BAI. The purpose of the preferential pathway study is to locate potential migration pathways and conduits and determine the probability of the NAPL and/or plume encountering preferential pathways and conduits that could spread contamination. BAI presented a preferential pathway evaluation in their January 29, 2004 "Soil Parameters and Confirmation Soil Sampling Workplan and Sensitive Receptor Survey Report." However, BAI did not identify depths of utilities, evaluate whether utility corridors intersect groundwater in the site vicinity, or evaluate whether preferential contaminant migration along utility corridors may be occurring. Therefore, we request that you again perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for vertical and lateral migration that may be present in the vicinity of the site.

Discuss your analysis and interpretation of the results of the preferential pathway study and report your results in the SCM requested below. The results of your study shall contain all information required by California Code of Regulations, Title 23, Division 3, Chapter 16, §2654(b).

### a. Utility Survey

An evaluation of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s) is required as part of your study. Please include maps and cross-sections illustrating the location and depth of all utility lines and trenches within and near the site and plume areas(s) as part of your study.

2. **Site Conceptual Model** – As mentioned above, TPH-g, toluene, and xylenes were detected at concentrations of 5,700 mg/kg, 54 mg/kg, and 53 mg/kg, respectively, indicating that the site may pose a risk to human health and the environment. Since concentrations of contaminants are still elevated, potential contaminant volatilization to indoor air exposure pathway may be complete and has not yet been evaluated. In order to direct this case towards case closure, it may be advantageous to develop a site conceptual model (SCM), which synthesizes all the analytical data and evaluates all potential exposure pathways and potential receptors that may exist at the site, including identifying or developing site cleanup objectives and goals. At a minimum, the SCM should include:
  - (1) Local and regional plan view maps that illustrate the location of sources (former facilities, piping, tanks, etc.) extent of contamination, direction and rate of groundwater flow, potential preferential pathways, and locations of receptors;
  - (2) Geologic cross section maps that illustrate subsurface features, man-made conduits, and lateral and vertical extent of contamination;
  - (3) Plots of chemical concentrations versus time;

- (4) Plots of chemical concentrations versus distance from the source;
- (5) Summary tables of chemical concentrations in different media (i.e. soil, groundwater, and soil vapor); and
- (6) Well logs, boring logs, and well survey maps;
- (7) Discussion of likely contaminant fate and transport.

If data gaps (i.e. potential contaminant volatilization from soil or groundwater to indoor air or contaminant migration along preferential pathways, etc.) are identified in the SCM, please include a proposed scope of work to address those data gaps in the SCM due by the date specified below.

3. **Groundwater Contaminant Plume Monitoring** – Semi-annual groundwater sampling is currently conducted at the site. Since several years of groundwater monitoring data exists for the site, you may propose a revised groundwater sampling schedule, which may include annual groundwater sampling for a majority of site monitoring wells. Please include a revised groundwater monitoring schedule for review in the SCM requested by the date specified below.
4. **Electronic Reporting** – In addition to electronic data and report uploads to GeoTracker, you are required to upload electronic copies (PDF versions) of all submittals to ACEH's FTP server (please see the enclosed instructions). In order to maintain compliance with ACEH, please upload all future submittals as above and described in the enclosed instructions.

#### **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:

- **December 2, 2008** – SCM (to include Preferential Pathway Evaluation & Data Gap Work Plan)
- **April 30, 2009** – Quarterly Monitoring Report (1<sup>st</sup> Quarter 2009)
- **October 30, 2009** – Quarterly Monitoring Report (3<sup>rd</sup> Quarter 2009)

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](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.

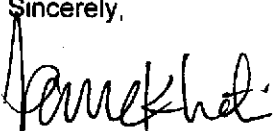
Ms. Callison  
RO0000514  
October 3, 2008, Page 5

**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](mailto:paresh.khatri@acgov.org).

Sincerely,



Paresh C. Khatri  
Hazardous Materials Specialist



Jerry Wickham, PG, CHG, CEG  
Acting Supervising Hazardous Material Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: David Conley, Brunsing Associates, 5468 Skylane Blvd., Suite 201, Santa Rosa, CA 95403  
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA  
94612-2032  
Donna Drogos  
Paresh Khatri  
File

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>ISSUE DATE:</b> July 5, 2005
	<b>REVISION DATE:</b> December 16, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, 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](mailto:dehloptoxic@acgov.org)  
or
    - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
  - 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](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)