



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-93

April 29, 2009

Ms. Naomi Gatzke
1545 Scenic View Drive
San Leandro, CA 94577

Mr. Hooshi Ghassemi
1499 MacArthur Blvd.
Oakland, CA 94602-1045

Subject: Fuel Leak Case No. RO0000516 and Geotracker Global ID T0600100714, Hooshi's Auto Service, 1499 MacArthur Blvd., Oakland, CA 94602

Dear Ms. Gatzke and Mr. Ghassemi:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the document entitled, "*Work Plan, Gatzke/Hooshi's Auto Service, 1499 MacArthur Boulevard, Oakland, California,*" dated December 23, 2008. Due to an error in document tracking, review of this document was delayed. We apologize for the delay in reviewing and providing comments on the December 23, 2008 Work Plan. The Work Plan, which was prepared on your behalf by Conestoga-Rovers & Associates, proposes monitoring well and soil vapor probe installation and sampling.

The proposed scope of work is generally acceptable and may be implemented provided that the technical comments below are addressed and incorporated during the field investigation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed. We request that you address the technical comments below, perform the proposed work, and send us the reports requested below.

TECHNICAL COMMENTS

1. **Soil Vapor Sampling Methods.** The soil vapor purging, sampling, and leak detection methods in Appendix C (Standard Field Procedures for Vapor Point Installation and Sampling) are somewhat generalized. We request that soil vapor samples be collected in accordance with guidance in the "*Advisory – Active Soil Gas Investigations,*" (Department of Toxic Substances Control and California Regional Water Quality Control Board January 28, 2003).
2. **Soil Vapor Analytical Methods.** The proposed use of EPA Method TO-15 for soil vapor analyses is acceptable. The use of EPA Method 8260 for soil vapor analyses is also acceptable and may be more cost effective provided that a reporting limit of 85 micrograms per liter ($\mu\text{g/L}$) can be achieved for benzene, toluene, ethylbenzene, and xylenes (BTEX). In addition to the proposed analyses, all soil vapor samples must be analyzed for O_2 , CO_2 , and

methane using ASTM D-1946. Please present the soil vapor sampling results in the Site Investigation Report requested below.

3. **Proposed Well MW-7.** Section 4.2 of the Work Plan refers to the general guidance for well installation in Appendix B but does not indicate whether soils will be logged, screened, or sampled during drilling. We request that soils be continuously sampled during drilling for logging and screening. Soil samples are to be collected for laboratory analysis from any zones where visible staining, odor, or elevated PID readings are observed. If no visible staining, odor, or elevated PID readings are observed, collection of soil samples is not required. The Work Plan indicates that a 15-foot well screen will be installed. Please note that although the existing wells are 20-feet deep at the site, the proposed location of MW-7 is approximately 10 feet lower than the remainder of the site. In order to sample the shallow groundwater zone apparently impacted at the site, we request that proposed well MW-7 have no greater than a 5-foot screen interval and be no deeper than 10 feet bgs. Please present the results of well installation including the boring log and well completion information in the Site Investigation Report requested below.
4. **Groundwater Monitoring.** Quarterly groundwater monitoring is not required for this site and should be suspended. At the time that proposed well MW-7 is sampled, we request that you gauge water levels in all existing wells but sampling of the existing wells is not required. The groundwater sample from well MW-7 is to be analyzed for TPH as gasoline, BTEX, and MTBE. The analytical methods used for the First Quarter 2009 groundwater monitoring event are acceptable for analysis of the groundwater sample from MW-7. Please present the results from sampling of well MW-7 in the Site Investigation Report requested below.
5. **Table 2.** In any future reports where Table 2 is presented, please adjust the page format so that the notes appear on the same page as the analytical data they pertain to.
6. **Table 4.** Table 4 shows the soil vapor results in mg/m^3 . The correct unit for these results is $\mu\text{g}/\text{m}^3$. Please correct the units in future reports where these results are presented.

TECHNICAL REPORT REQUEST

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

- **September 9, 2009** – Site Investigation Report

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.

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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/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.

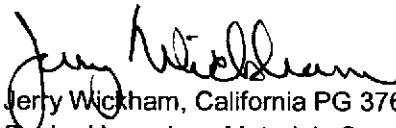
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AGENCY OVERSIGHT

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 or send me an electronic mail message at jerry.wickham@acgov.org. Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA
94612-2032

Mark Jonas, Conestoga-Rovers & Associates, 5900 Hollis Street, Suite A
Emeryville, CA 94608

Donna Drogos, ACEH
Jerry Wickham, ACEH
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.