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January 22, 2008

Mr. Joseph Sabel
US Coast Guard
2000 Embarcadero, Suite 200
Oakland, CA 94606-5337

Subject: Fuel Leak Case No. RO0002443 (Global ID#T06019779998), Coast Guard Island, Building 44, Alameda, CA

Dear Mr. Sabel:

Alameda County Environmental Health Department (ACEH) staff has reviewed the report entitled, "Sampling and Analysis Plan," dated December 18, 2007 and prepared on your behalf by ERRG. The work plan includes recommendations for the installation of seven soil boring and four additional step out soil borings, if necessary. The stated purpose of the investigation is to evaluate the vertical and lateral extent of soil and groundwater contamination beneath and adjacent to the former UST. ACEH generally agrees with the scope of work, provided the following comments are addressed prior to implementation of the work plan.

Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to steven.plunkett@acgov.org) prior to the start of field activities.

TECHNICAL COMMENT

1. **Site Characterization and Soil Boring Locations.** Historically high concentrations of TPHd, and 1,1,2-tirchloroethane (TCA) have been detected in groundwater and soil beneath your site at concentrations of up to 100,000 µg/L and 6 ppm, respectively. To determine the vertical and horizontal extent of hydrocarbon contamination beneath and downgradient of your site ERRG has proposed the installation of seven soil borings. ACEH generally agrees with the proposed soil boring locations as recommended in the work plan, with the addition of one soil boring placed approximately midway between the two proposed soil boring directly adjacent to the estuary bank. Please present results for the soil and groundwater investigation report (SWI) requested below.

2. **Environmental Screening Levels (ESL).** ERRG has proposed the use of ESLs based on the potential for groundwater to be used as potential drinking water resource. Additionally, ESLs for estuarine surface water bodies will be used as a comparison for groundwater quality analysis. ACEH agrees with the ESLs as proposed in the work plan.

3. **Temporary Monitoring Wells.** ERRG suggest the installation of temporary piezometers to assess diurnal fluctuations of groundwater elevations associated with tidal variations. The

groundwater elevation data will then be used to calculate hydraulic gradient and to construct potentiometric surface maps.

4. **Geologic Cross Sections**. The SWI Report requested below is to include one cross section in the groundwater flow direction and one cross section approximately perpendicular to the direction of groundwater flow. Each cross section should include the following:

   a. Surface topography. The cross sections should be extended off-site where necessary to show significant breaks in slope.
   b. Soil descriptions for all borings and wells along the line of section.
   c. Screen and filter pack intervals for each monitoring well.
   d. Sampling locations and results for soil and grab groundwater samples.
   e. Site features such as the tank pit, dispensers, etc.
   f. Where appropriate, monitoring well location and soil boring locations will be projected back to the strike of the cross section line.

5. **Soil Sampling and Analysis**. Soil samples are to be collected from all soil borings. During the soil boring installation, soil samples should be screened with a PID and examined for visible staining and hydrocarbon odor. Any interval where staining, odor, or elevated PID readings occur a soil sample is to be collected and submitted for laboratory analysis. If no staining, odor, or elevated PID readings are observed, soil sample are to be analyzed from each boring at the capillary fringe, where groundwater is first encountered, changes in lithology, and at the total depth of the boring at least 15 feet below ground surface.

   All soil samples collected during the investigation are to be analyzed for TPHg and TPHd by EPA Method 8015M and TPH oil and grease by EPA method 418; BTEX, EDB, EDC, MtBE, TAME, ETBE, DIPE, TBA, TCA, 1-4 dioxane and EtOH by EPA Method 8260. The following metals Cd, Cr, Pb, Ni and Zn and PCBs must also be included for laboratory analysis. Please present the results from the soil sampling in the SWI Report requested below.

6. **Groundwater Sampling and Analysis**. Grab groundwater samples must not be collected from open boreholes at any of the proposed groundwater sampling locations. All grab groundwater samples shall be collected from a soil borings with a temporary well casing installed for groundwater sampling. All groundwater samples collected during the investigation are to be analyzed for TPHg and TPHd by EPA Method 8015M and TPH oil and grease by EPA method 418; BTEX, EDB, EDC, MtBE, TAME, ETBE, DIPE, TBA, TCA, 1-4 dioxane and EtOH by EPA Method 8260. The following metals Cd, Cr, Pb, Ni and Zn and PCBs must also be included for laboratory analysis.Please present the results from the soil and groundwater sampling in the SWI report requested below.

7. **Geotracker EDF Submittals** - A review of the case file and the State Water Resources Control Board's (SWRCB) Geotracker website indicate that electronic copies of analytical data have not been submitted for your site. Pursuant to CCR Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, beginning January 1, 2002, all permanent monitoring points utilized to collected groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-

meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload all analytical data (collected on or after September 1, 2001), to the SWRCB's Geotracker database website in accordance with the above-cited regulation. Please perform the electronic submittals for applicable data and submit verification to this Agency by October 30, 2006.

TECHNICAL REPORT REQUEST

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

- **March 1, 2008** - Soil and Groundwater 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.

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).

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) 383-1767.

Sincerely,

Steven Plunkett
Hazardous Materials Specialist

cc: Gail Bouffard
United States Coast Guard
Building 15, Coast Guard Island
Alameda, CA 94510

Melanie Enman
ERRG
115 Sansome Street
San Francisco, CA 94520

Donna Drogos, ACEH, Steven Plunkett, ACEH, File