

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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(510) 567-6700  
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November 13, 2008

Ms. Sharon Miller  
Allied Engineering and Production Corp.  
2421 Blanding Avenue  
Alameda, CA 94501

Subject: Fuel Leak Case No. RO0002601 (Geotracker Global ID #T06019716048), Allied Engineering Corporation, 2421 Blanding Avenue, Alameda, CA

Dear Ms. Miller:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above referenced site and the report entitled, "Soil and Groundwater Investigation Report (SWI)," Submitted August 3, 2007 and prepared by Geo-logic Environmental Consulting Service (Geo-logic). Soil samples collected near the former dispenser island detected TPHg and benzene at concentrations of up to 1,100 ppm and 1.7 ppm, indicating that residual contamination is present in soil beneath your site. In addition, during the UST removal contaminated soil in the tank pit was left in place, and concentrations of 6400 ppm TPHg and 6.4 ppm benzene and metal shavings remain in soil beneath your site.

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

**TECHNICAL COMMENTS**

- 1. Metals Contamination in Soil.** High levels of metals (above the ESLs) were detected in soil collected from soil boring and B7 at concentrations up to 19 mg/kg arsenic, 50 mg/kg cadmium, 2,800 mg/kg chromium, 390 mg/kg copper, 8,100 mg/kg lead, 360 mg/kg molybdenum, 1,800 mg/kg nickel, 1,000 mg/kg zinc. In addition, elevated levels (above the ESLs) of dissolved metals have been detected in groundwater beneath your site at concentrations up to 82 µg/L arsenic, 6,100 µg/L barium, 5,300 µg/L cadmium, 2,900 µg/L chromium, 330 µg/L cobalt, 930 µg/L copper, 3,300 µg/L lead, 4.8 µg/L mercury, 42 µg/L molybdenum, 3,000 µg/L nickel, 4.6 µg/L silver, 1,900 µg/L vanadium and 2,600 µg/L zinc. These levels of metals in soil and groundwater may pose a threat to the adjacent estuary. Therefore, we request that you propose interim remediation measures to mitigate the impact of metals to soil and groundwater and the estuary. Please prepare a work plan that details your proposal to remediate metals contamination to soil and groundwater and submit it according to the schedule outlined below.
- 2. Groundwater Contaminate Plume Monitoring.** Currently, no groundwater monitoring well have been installed to evaluate the impacts to groundwater beneath your site. Therefore, we request that you propose the installation of groundwater monitoring well network to evaluate the dissolved phase contaminant plumes associated with your site. Please submit the work plan according to the schedule below.

3. **Figures and Tables.** During our review of the soil and groundwater investigation report, ACEH noted that figures 1 through figure 3 did not have a measurable scale. In the future, please provide a measurable scale on all maps and figures submitted for this site.

#### **TECHNICAL REPORT REQUEST**

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

- **January 15, 2009** – Work Plan.

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**

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was 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](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

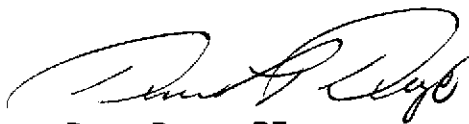
If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

Should you have any questions, do not hesitate to call me at (510) 383-1767.

Sincerely,



Steven Plunkett  
Hazardous Materials Specialist



Donna Drogos, PE  
Supervising Hazardous Materials Specialist

cc: Joel Greger  
Geo-logic Environmental Consulting Service  
1140 5<sup>th</sup> Avenue  
Crockett, CA 94525

Donna Drogos, ACEH, Steven Plunkett, ACEH, File