

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION
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May 30, 2007

Bishop Robert Jackson
ACTS Community Development
1034 66th Avenue
Oakland, CA 94621

Daniel Ustin
P.O. Box 591
Garden Vall, ID 83622

Man F. and Siumei L. Chu
2985 California Street
Oakland, CA 94602

Subject: LOP Case RO0002905 and Geotracker Global ID SL0600129548, ACTS Community Development, 1001 77th Avenue, Oakland, CA 94621

Dear Bishop Jackson, Daniel Ustin, and Man F. and Siumei L. Chu:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted report entitled, "Interim Technical Report on Offsite Subsurface Hydrogeologic Investigation and Initial Groundwater Monitoring of Hydrocarbons," dated May 9, 2007. The Interim Report presents results from installation of four monitoring wells. Elevated concentrations of fuel hydrocarbons were detected in well MW-4, which is located in close proximity to the former underground storage tank (UST). Trichloroethene was reportedly detected in the two monitoring wells located in Spencer Street west of the site. The Interim Technical Report recommends the installation of two additional monitoring wells east of the existing wells in order to define plume extent in the apparent downgradient direction. We have no objection to the installation of two wells to further delineate plume extent in the apparent downgradient. However, further evaluation of potential migration pathways related to the utilities and the source of TCE will be required.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Proposed Well Installation.** Installation of the two proposed wells is acceptable using the procedures listed in the previous June 27, 2006 Work Plan entitled, "Work Plan for an Off-site Subsurface Investigation of Hydrocarbons at the Former UST Site – Case RO2905." Please present the results in the Site Investigation Report requested below.
2. **Current Well Locations.** Well MW-1 was installed across the street from its proposed location due to the presence of underground obstructions. Placement of well MW-1 in relatively close proximity to well MW-2 limits the effectiveness of groundwater monitoring to

delineate contamination northwest of BH-07. We note that well MW-4 was moved west of its proposed location although ACEH requested (electronic mail dated July 17, 2006) that the well be moved to the east if adjustment of the proposed location was required. If proposed wells MW-5 or MW-6 cannot be installed in their proposed locations due to subsurface obstructions, please submit revised locations to ACEH prior to well installation.

3. **Lead Analyses for Soil Samples.** No lead analyses appear to have been conducted on soil samples. We previously requested that total lead be included as an analyte for all soil samples submitted for laboratory analysis. Please include lead as an analyte for future soil samples.
4. **Laboratory Analyses for Groundwater Samples.** Trichloroethene (TCE) was identified in a note on the laboratory analytical results report but was not a specific analyte for any of the groundwater analyses performed. In order to confirm the presence of TCE, we request that you analyze groundwater samples from the two additional monitoring wells and four existing wells for a full target list of volatile organic compounds (VOCs) using EPA Method 8260B. All groundwater samples are to be analyzed for TPH as diesel using EPA Method 8015M and TPH as gasoline, full scan target list for VOCs, BTEX, MTBE, and lead scavengers (ethylene dibromide and 1,2-dichloroethane) using EPA Method 8260B. Please present these results in the Site Investigation Report requested below.
5. **PAH Analyses for Soil and Groundwater Samples.** It is not clear why PAH analysis using EPA Method 8270C was conducted on soil and groundwater samples. PAH analysis was not proposed in the June 27, 2006 Work Plan nor was it requested by ACEH.
6. **Detailed Well Survey.** Please present results from the requested well survey in the Site Investigation Report.
7. **Utility Survey.** An evaluation of the potential for utility lines and trenches (including sewers, storm drains, pipelines, and trench backfill) to act as preferential pathways for contaminant migration is required. Specifically, we request that you locate the sanitary sewer line from the on-site building to the street. Further investigation of the source of TCE, if confirmed to be present, will be required. However, it is necessary to locate the utilities that could act as preferential pathways prior to proposing further investigation of the source of TCE. We note that TCE was detected at a fuel leak site located on the south side of 77th Avenue approximately 550 feet southwest of the site. Based on results from grab groundwater sampling in 77th Avenue, TCE was suspected to be moving along the trench backfill or was being discharged from the sewer. Please present a map in the Site Investigation Report requested below showing the locations and depths of utility lines and trenches within and near the site. Please also present recommendations for future investigation activities to assess whether the site is a source of the TCE detected in groundwater beneath Spencer Street.

TECHNICAL REPORT REQUEST

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

- **September 14, 2007 – 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.

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).

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

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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

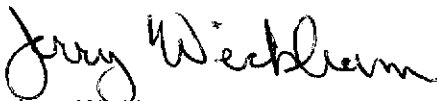
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Frank Goldman
Environmental and Hydrogeological Consulting
P.O. Box 58
Sonoma, CA 95476

Donna Drogos, ACEH
Jerry Wickham, ACEH
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