



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

February 7, 2013

Rashid Ghafoor and Waseem Iqbal (Sent via e-mail to rashidz1@aol.com)  
226 Havenwood Circle  
Pittsburg, CA 94567

Subject: Revised Corrective Action Plan for Fuel Leak Case No. RO0002931 and GeoTracker Global ID T0600174667, Shore Acres Gas, 403 E 12<sup>th</sup> St., Oakland, CA 94606

Dear Messrs. Ghafoor and Iqbal:

Alameda County Environmental Health (ACEH) staff has reviewed the recently submitted document entitled, *Revised Corrective Action Plan* dated October 25, 2012, which was prepared by Environmental Compliance Group (ECG), LLC for the subject site. The Revised CAP presents an evaluation of three active remediation methods including costs with timeframes to reach clean-up levels. The selected remedial option is dual phase extraction (DPE) based on the time frame and lowest costs of cleanup.

The proposed scope of work to implement DPE is acceptable for public comment at this time. Therefore, we request that you distribute the Fact Sheet (attached) to the attached mailing list. Following distribution of the Fact Sheet, please provide personal verification by e-mail or uploaded letter that the Fact Sheet was distributed by U.S. Mail no later than January 20, 2012.

At the end of the 30-day public comment period, ACEH may request that you address the public comments received. If no public comments are received, ACEH may approve implementation of operation of the DPE provided that technical comment 1 below is incorporated during implementation of DPE. We request that you address the following comments, perform the requested work, and send us the reports described below.

#### **TECHNICAL COMMENTS**

1. **Downgradient Extent of Groundwater Contamination** – Groundwater samples collected from off-site boring SB-16 contained 4,800 micrograms per liter ( $\mu\text{g/L}$ ) total petroleum hydrocarbons as gasoline (TPHg) and 1,600  $\mu\text{g/L}$  benzene, yet no off-site downgradient monitoring wells have been installed. Please present a work plan to install an appropriate groundwater monitoring and performance monitoring network along transects by the due date listed below. We anticipate that the transect(s) of wells be installed concurrently with system installation and sampled prior to system startup.

2. **Groundwater Monitoring** - Please implement quarterly monitoring for all monitoring wells and quarterly reporting once remediation begins.
3. **Soil Vapor Sampling** – An evaluation of vapor intrusion at the site and adjacent residential properties have not been performed. Please submit a work plan to evaluate soil vapor by the due date below.
4. **Landowner Notification** - Pursuant to Section 25297.15 (a), ACEH, the local agency, shall not consider cleanup or site closure proposals from the primary or active responsible party, issue a closure letter, or make a determination that no further action is required with respect to a site upon which there was an unauthorized release of hazardous substances from an underground storage tank subject to this chapter unless all current record owners of fee title to the site of the proposed action have been notified of the proposed action by the primary or active responsible party. ACEH is required to notify the primary or active responsible party of their requirement to certify in writing to the local agency that the notification requirement in the above-mentioned regulation has been satisfied and to provide the local agency with a complete mailing list of all record fee title owners.

To satisfy the above-mentioned requirement, please complete the enclosed "List of Landowners Form," and mail it back to ACEH within thirty (30) days from the date of this letter.

5. **Baseline Environmental Project Schedule** The State Water Resources Control Board passed Resolution No. 2012-0062 on November 6, 2012 which requires development of a Path to Closure Plan by December 31, 2013 that addresses the impediments to closure for the site. The Path to Closure must have milestone dates to calendar quarter which will achieve site cleanup and case closure in a timely and efficient manner that minimizes the cost of corrective action. The Project Schedule should include, but not be limited to, the following key environmental elements and milestones as appropriate:
  - Preferential Pathway Study
  - Soil, Groundwater, and Soil Vapor Investigations
  - Initial, Updated, and Final/Validated SCMs
  - Interim Remedial Actions
  - Feasibility Study/Corrective Action Plan
  - Pilot Tests
  - Remedial Actions
  - Soil Vapor and Groundwater Monitoring Well Installation and Monitoring
  - Public Participation Program (Fact Sheet Preparation/Distribution/Public Comment Period, Community Meetings, etc.)
  - Case Closure Tasks (Request for closure documents, ACEH Case Closure Summary Preparation and Review, Site Management Plan, Institutional Controls, Public Participation, Landowner Notification, Well Decommissioning, Waste Removal, and Reporting.)

Please include time for regulatory and RP in house review, permitting, off-site access agreements, and utility connections, etc.

Please use a critical path methodology/tool to construct a schedule with sufficient detail to support a realistic and achievable Path to Closure Schedule. The schedule is to include at a minimum:

- Defined work breakdown structure including summary tasks required to accomplish the project objectives and required deliverables
- Summary task decomposition into smaller more manageable components that can be scheduled, monitored, and controlled
- Sequencing of activities to identify and document relationships among the project activities using logical relationships
- Identification of critical paths, linkages, predecessor and successor activities, leads and lags, and key milestones
- Identification of entity responsible for executing work
- Estimated activity durations (60-day ACEH review times are based on calendar days)

Please submit an electronic copy of the Path to Closure Schedule by the date listed below. ACEH will review the schedule to ensure that all key elements are included.

### **TECHNICAL REPORT REQUEST**

Please submit technical reports to ACEH (Attention: Barbara Jakub), according to the following schedule:

- **February 19, 2013** – Send out Fact Sheet
- **February 25, 2013** – Verification that Fact Sheet was distributed to the attached mailing list and persons on cc list at the end of this correspondence and Landowner Notification Form
- **March 21, 2013** – Public Comment Period Ends
- **April 8, 2013** – Work Plan  
(File to be named WP\_R\_YYYY-mm-dd)
- **April 8, 2013** – Path to Closure and Schedule  
(File to be named PROJ\_SCH\_YYYY-mm-dd)
- **June 20, 2013** – Quarterly Monitoring Report (2nd Quarter 2013)  
(File to be named GWM\_R\_YYYY-mm-dd)

- **September 20, 2013** – Quarterly Monitoring Report (3rd Quarter 2013)  
(File to be named GWM\_R\_YYYY-mm-dd)
- **December 20, 2013** – Quarterly Monitoring Report (4th Quarter 2013)  
(File to be named GWM\_R\_YYYY-mm-dd)

Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 639-1287 or send me an electronic mail message at [barbara.jakub@acgov.org](mailto:barbara.jakub@acgov.org).

Sincerely,

Barbara J. Jakub, P.G.  
Hazardous Materials Specialist

Enclosure:      Public Notification of Site Remediation  
                     Mailing List for Fact Sheet  
                     List of Landowners Form Responsible Party(ies) Legal Requirements/Obligations  
                     ACEH Electronic Report Upload (ftp) Instructions

cc:      Michael S. Sgourakis, Environmental Compliance Group, LLC, 270 Vintage Drive,  
            Turlock, CA 95382 (*Sent via E-mail to: [ecg.ust@gmail.com](mailto:ecg.ust@gmail.com)*)  
            Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland,  
            CA 94612-2032 (*Sent via E-mail to: [lgriffin@oaklandnet.com](mailto:lgriffin@oaklandnet.com)*)  
            Donna Drogos, ACEH (*Sent via E-mail to: [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org)*)  
            Barbara Jakub, ACEH (*Sent via E-mail to: [barbara.jakub@acgov.org](mailto:barbara.jakub@acgov.org)*)  
            GeoTracker, e-file



## FACT SHEET ON ENVIRONMENTAL ASSESSMENT

### Shore Acres Gas

403 E 12th Street, Oakland, CA 94606  
Fuel Leak Case No. RO0002931 and  
GeoTracker Global ID T0600174667

#### Site Remediation Summary

This fact sheet has been prepared to inform community members and other interested stakeholders regarding the status of a proposed soil and groundwater cleanup at Shore Acres Gas located at 403 E 12th St., Oakland, California. Mr. Rashid Ghafoor and Mr. Waseem Iqbal, the lead responsible party for the fuel leak case is proposing to operate a dual-phase extraction (DPE) system.

#### Site Background

The site is located near Lake Merritt in a mixed residential and commercial area on the southern corner of 4<sup>th</sup> Avenue and E 12<sup>th</sup> St. The site was formerly used as a gasoline station but the underground storage tanks (USTs) were removed in 2009. The USTs leaked and petroleum hydrocarbons including total petroleum hydrocarbons as gasoline, benzene, toluene, ethyl benzene, xylenes and methyl tertiary butyl ether (MTBE) entered the soil and groundwater. The site is currently vacant awaiting future development after remediation.

Remediation Alternative: Dual-Phase Extraction (DPE): DPE is proposed to remediate soil and groundwater contaminated with petroleum hydrocarbons at the site. This remediation method was selected after a pilot test that was performed at the site proved successful at removing contaminants from soil and groundwater. The proposed remediation will extract groundwater and soil vapor from four on-site wells. The extracted groundwater and vapors will be sent through a catalytic oxidizer and the groundwater removed will be treated and discharged per permit requirements. Two additional extraction wells will be installed and the piping for the DPE system will be installed below the ground surface. The DPE is expected to operate for approximately two years but will be

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

operated until petroleum hydrocarbons have reached the cleanup levels established in the Revised CAP.

#### Next Step

The responsible parties are working with Alameda County Environmental Health (ACEH) to implement a soil and groundwater cleanup at the site. The proposed alternative is described in the reports *Corrective Action Plan* dated June 10, 2012 and *Revised Corrective Action Plan* dated October 25, 2012 prepared by ECG on behalf of Messrs. Ghafoor and Iqbal. The public is invited to review and comment on the proposed cleanup action. The reports are available on ACEH's website (<http://www.acgov.org/aceh/lop/ust.htm>) or the State Water Resources Control Board's GeoTracker website (<http://www.geotracker.waterboards.ca.gov/>). Please send written comments regarding the corrective action to Barbara Jakub at the address below. All written comments received by **March 21, 2013** will be forwarded to the Responsible Party and will be considered and responded to prior to a final determination on the proposed cleanup.

*For Additional information, please contact:*

|   |   |
|---|---|
| Barbara Jakub<br>Alameda County Environmental<br>Health<br>1131 Harbor Bay Parkway, Ste 250<br>Alameda, CA 94502<br>Phone: 510-639-1287<br>E-mail: <a href="mailto:barbara.jakub@acgov.org">barbara.jakub@acgov.org</a> | Michael S. Sgourakis<br>ECG, LLC<br>270 Vintage Drive<br>Turlock, CA 95382<br>Phone: 209-661-1035<br>E-mail: <a href="mailto:ecg.ust@gmail.com">ecg.ust@gmail.com</a> |
|---|---|

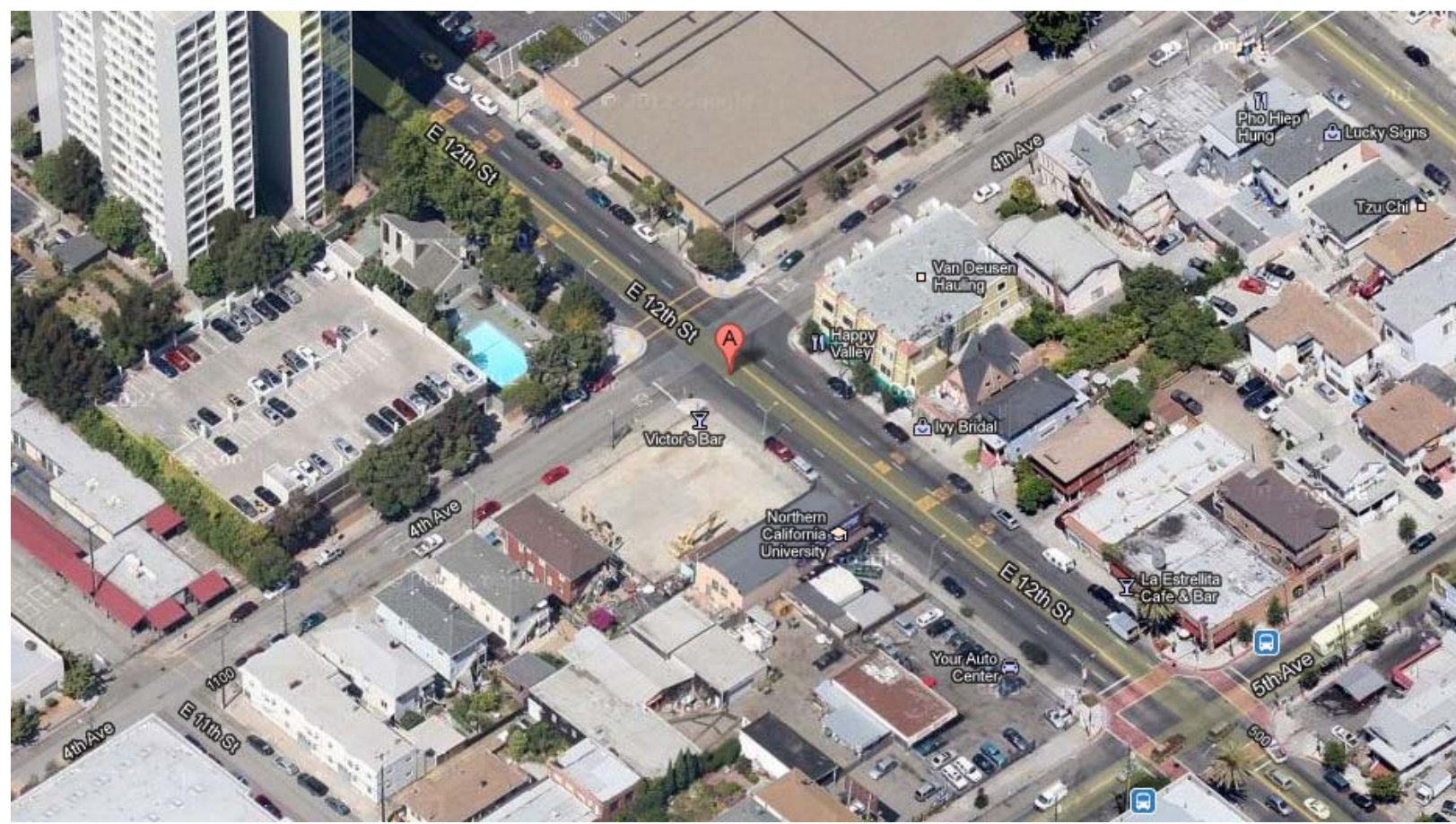


Figure 1 – Site Location

CALIT VICKI TR  
Parcel #: 19-30-14  
1100 4TH AVE  
OAKLAND CA 94606

DORSEY ROBERT A  
Parcel #: 20-125-26  
440 SUNNYSLOPE AVE  
OAKLAND CA 94610

DORSEY ROBERT A  
Parcel #: 20-125-24  
440 SUNNYSLOPE AVE  
OAKLAND CA 94610

HA ANH V  
Parcel #: 20-125-15  
299 13TH ST  
OAKLAND CA 94612

KW LAKE MERRITT LLC  
Parcel #: 19-29-15-2  
9701 WILSHIRE BLVD #700  
BEVERLY HILLS CA 90212

LEE ABEL TR  
Parcel #: 19-30-15  
2442 FARROL AVE  
UNION CITY CA 94587

LEW FUNG L TR  
Parcel #: 19-30-17  
1126 4TH AVE  
OAKLAND CA 94606

LIVAK ANDREW J  
Parcel #: 20-125-22  
1216 4TH AVE  
OAKLAND CA 94606

MONTOYA JUDY & RUSSO  
Parcel #: 20-125-14  
2500 SANTA CLARA AVE  
ALAMEDA CA 94501

NGUYEN ALEXANDER T &  
Parcel #: 20-125-23  
1220 4TH AVE  
OAKLAND CA 94606

OAKLAND UNIFIED SCHOOL  
Parcel #: 19-29-14-6  
1025 2ND AVE #316  
OAKLAND CA 94606

OAKLAND UNIFIED SCHOOL  
Parcel #: 19-29-14-7  
1025 2ND AVE #316  
OAKLAND CA 94606

OAKLAND UNIFIED SCHOOL  
Parcel #: 19-23-1-1  
1025 2ND AVE #316  
OAKLAND CA 94606

OMOSHEYIN KAYDE  
Parcel #: 19-30-16  
1118 4TH AVE  
OAKLAND CA 94606

RESIDENT  
Parcel #: 20-125-26  
406 E 12TH ST  
OAKLAND CA 94606

RESIDENT  
Parcel #: 20-125-24  
1218 4TH AVE  
OAKLAND CA 94606

RESIDENT  
Parcel #: 19-29-14-6  
4TH AVE  
OAKLAND CA 94606

RESIDENT  
Parcel #: 19-29-14-7  
1100 3RD AVE  
OAKLAND CA 94606

RESIDENT  
Parcel #: 19-30-1-1  
409 E 12TH ST  
OAKLAND CA 94606

RESIDENT  
Parcel #: 19-30-4-1  
427 E 12TH ST  
OAKLAND CA 94606

RESIDENT  
Parcel #: 19-30-15  
1114 4TH AVE  
OAKLAND CA 94606

RESIDENT  
Parcel #: 19-29-15-2  
333 E 12TH ST  
OAKLAND CA 94607

RESIDENT  
Parcel #: 19-30-2-1  
415 E 12TH ST  
OAKLAND CA 94606

RESIDENT  
Parcel #: 19-23-1-1  
1029 4TH AVE  
OAKLAND CA 94606

RESIDENT  
Parcel #: 19-30-6  
1131 5TH AVE  
OAKLAND CA 94606

RESIDENT  
Parcel #: 19-30-14  
1106 4TH AVE  
OAKLAND CA 94606

RESIDENT  
Parcel #: 20-125-14  
422 E 12TH ST  
OAKLAND CA 94606

RESIDENT  
Parcel #: 20-125-15  
414 E 12TH ST  
OAKLAND CA 94606

ROBERTSON JOHN D & KAREN  
Parcel #: 19-30-18  
1138 4TH AVE  
OAKLAND CA 94606

SILVEIRA J W & BARBARA O  
Parcel #: 19-30-4-1  
499 EMBARCADERO  
OAKLAND CA 94606

SILVEIRA J W & BARBARA O  
Parcel #: 19-30-6  
499 EMBARCADERO  
OAKLAND CA 94606

SOHIAL RASHID & GHANI  
Parcel #: 19-30-1-1  
226 HAVENWOOD CIR  
PITTSBURG CA 94565

YIM ELIZABETH  
Parcel #: 20-125-25  
408 E 12TH ST  
OAKLAND CA 94606

YIM ELIZABETH  
Parcel #: 20-125-21  
400 E 12TH ST  
OAKLAND CA 94606

YOUNG BOCK K & RUAN YU O  
Parcel #: 19-30-2-1  
4315 HARBOR VIEW AVE  
OAKLAND CA 94619



Attachment 1

LIST OF LANDOWNERS FORM

County of Alameda
Environmental Health Services
Environmental Protection
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR:

Site Name: Shore Acres Gas
Address: 403 E. 12th St.
City, State, Zip: Oakland, CA 94606
Record ID #: RO0002931

Please fill out item 1 if there are multiple site landowners (attach an extra sheet if necessary). If you are the sole site landowner, skip item 1 and fill out item 2.

1. In accordance with Section 25297.15(a) of Chapter 6.7 of the California Health & Safety Code, I, (name of primary responsible party), certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site:

Name:
Address:
City, State, Zip:
E-mail Address:

Name:
Address:
City, State, Zip:
E-mail Address:

Name:
Address:

Name:
Address:

Name:
Address:

Name:
Address:

# Attachment 1

Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City, State, Zip: \_\_\_\_\_  
E-mail Address: \_\_\_\_\_

2. In accordance with Section 25297.15(a) of Chapter 6.7 of the California Health & Safety Code, I \_\_\_\_\_, certify that I am the sole landowner for the above site.

Sincerely,

\_\_\_\_\_

Signature of Primary Responsible Party

Printed Name

Date

E-mail Address

# Attachment 1

## Responsible Party(ies) Legal Requirements/Obligations

### REPORT REQUESTS

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.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)).

### 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.

|   |  |
|---|--|
| <b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b> | <b>REVISION DATE:</b> July 20, 2010  |
|   | <b>ISSUE DATE:</b> July 5, 2005  |
|   | <b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010 |
| <b>SECTION:</b> Miscellaneous Administrative Topics & Procedures              | <b>SUBJECT:</b> 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

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection.**
- 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)

## 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 [deh.loptoxic@acgov.org](mailto:deh.loptoxic@acgov.org)
  - 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, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
  - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
  - 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 [deh.loptoxic@acgov.org](mailto:deh.loptoxic@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.