

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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February 7, 2008

Ms. Felicia Woytak
Ocean Avenue LLC
6114 LaSalle Avenue.
Oakland, CA 94608-1147

Subject: Fuel Leak Case No. RO0002937 (Global ID # SLT19794747), Ocean Avenue LLC, 1171 Ocean Avenue, Oakland, CA

Dear Ms. Woytak:

The source of dissolved phase chlorinated solvents (HVOCs) detected in groundwater beneath your site is currently unknown. Stellar Environmental Solutions, Inc. has prepared a work plan, which will attempt to locate a potential source of trichloroethylene (TCE) contamination beneath your site. The scope of work as proposed in the work plan recommends a dense network of up to 14 soil boring installed in the area of high dissolved TCE concentrations. Additionally, groundwater monitoring wells will be installed to evaluate the concentration trend of dissolved phase TCE contamination beneath your site. ACEH generally agrees with the recommendations in the work plan provided the following comments are implemented prior to the start of work.

ACEH request that you address the following technical comments, perform the proposed work, 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. **Soil Boring Locations and Sampling.** Stellar has proposed the installation of 14 soil boring to evaluate subsurface conditions in the southeast corner of the property, where dissolved phase TCE has been detected at concentrations of up to 10,000 µg/L. ACEH agrees with the proposed soil boring locations.

During soil boring installation, 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 collected from each boring at the capillary fringe, where groundwater is first encountered, changes in lithology, at approximately 5 foot intervals and at the total depth of the boring. ACEH agrees with the soil sample analysis as recommended by Stellar. Please present the results from the soil sampling in the Soil and Groundwater Investigation Report (SWI) requested below.

2. **Monitoring Well Construction and Installation.** To evaluate vertical concentration gradient of dissolved phase TCE contamination throughout the site, Stellar has propose the installation of three well pairs in areas of high TCE concentration. The monitoring well pairs will be used to evaluate discrete depths in an attempt to determine dissolved phase TCE

concentrations and to evaluate hydraulic gradient across the site. ACEH generally agrees with the proposed monitoring well construction, well development and well survey as recommended in the work plan. Please present results from the monitoring well installation in the SWI report requested below.

3. **Groundwater Sampling and Analysis.** ACEH agrees with the groundwater sample analysis as recommended by Stellar. Please present the results from the soil and groundwater sampling in the SWI requested below.
4. **Quarterly Groundwater Sampling.** ACEH concurs with the quarterly groundwater monitoring and sampling as recommended by Stellar. Please present results from quarterly sampling according to the schedule below.
5. **Hydrogeologic Cross Sections.** Please prepare two cross sections for the site, one cross section should be perpendicular to the orientation of the TCE plume and one cross section should be oriented parallel to the direction of the TCE plume. Please incorporate historical soil boring data including soil and groundwater analytical data, static water level and first water encountered, distinct geologic units and the location of former UST tank pit and appurtenance. Please present the cross sections in SWI report requested below.

TECHNICAL REPORT REQUEST

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

- **March 31, 2008** – Soil and Groundwater Investigation Report
- **June 30, 2008** – 2nd Quarter 2008 Groundwater Monitoring Report
- **September 30, 2008** – 3rd Quarter 2008 Groundwater Monitoring Report
- **December 30, 2008** – 3rd Quarter 2008 Groundwater Monitoring 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 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.

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

Ms. Felicia Woytek
January 12, 2008
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cc: Richard Makdisi
Stellar Environmental Solutions
2198 Sixth Street, Suite 201
Berkeley, CA 94710

Donna Drogos, ACEH, Steven Plunkett, ACEH, File