



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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March 6, 2009

Mr. Eric Hetrick
ConocoPhillips
76 Broadway
Sacramento, CA 95818

Coelho Gas, LLC
18616 Highway 33E
Dos Palos, CA 93620

Subject: Fuel Leak Case No. RO00002969 and Geotracker Global ID T0619718179, Unocal 36277 15803 E 14th St., San Leandro, CA 94706

Dear Mr. Hetrick and Mrs. Ella Coelho Trust:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the document entitled, *Additional Site Assessment Work Plan*, dated October 27, 2008 prepared by Delta. The work plan recommends installing eight soil borings utilizing Geoprobe and presented the results of a well survey and utility survey. We request that you address the following technical comments and submit a brief work plan addendum that addresses the technical comments below.

TECHNICAL COMMENTS

1. **Groundwater Analysis** – The boring logs do not indicate that high organic content is present in the borings; therefore, using Silica Gel cleanup for the total petroleum hydrocarbons as diesel may not be appropriate. We request that you collect duplicate groundwater samples, submit them for analysis with and without silica gel cleanup to determine if using silica gel cleanup is appropriate at this site. Please analyze groundwater samples for ethyl tertiary butyl ether (ETBE), di-isopropyl ether (DIPE), tertiary amyl methyl ether (TAME), tert butyl alcohol (TBA), ethylene dibromide (EDB), ethylene dichloride (EDC) and ethanol by EPA Method 8260 in addition to your proposed analysis. Ethanol analysis can be limited to the source area.
2. **Soil Analysis** – In addition to your proposed analysis, please analyze soil for ethyl tertiary butyl ether (ETBE), di-isopropyl ether (DIPE), tertiary amyl methyl ether (TAME), tert butyl alcohol (TBA), ethylene dibromide (EDB), and ethylene dichloride (EDC) by EPA Method 8260.

3. **Soil Sampling** – In addition to your proposed sampling at five foot intervals, at the capillary fringe and areas with high PID readings, ACEH also requests that you collect continuous soil samples for lithologic logging and also submit soil samples from the saturated zone to define the vertical extent of soil contamination since fluctuations in groundwater levels can submerge contaminated soils, leaving a soil source that would otherwise go undetected if not sampled.
4. **Groundwater Flow Direction and Soil Boring Locations.** Your work plan does not discuss the groundwater flow direction at the site. Information from the previous case closure summary for this site indicates that groundwater flow direction is to the northwest and north. Based on this flow direction, most of your boring locations are on the upgradient or cross-gradient direction and do not appear to be appropriately located. We request that you relocate your borings to define the lateral and vertical extent of contamination in soil and groundwater in the source areas (USTs and dispenser islands) and also areas downgradient of these locations. Also, consider placing borings along transects. Provide a map of your revised locations in the work plan addendum requested below. Please use aerial photographs as the base for all your maps.
5. **Vertical Extent of Contamination.** Your work plan does not propose a way to evaluate the vertical extent of contamination at the site as requested in the ACEH letter dated June 26, 2008 but suggests that this will be defined in the second phase of the work. Following the Expedited Site Assessment Process, ACEH recommends that the vertical extent of contamination be assessed along with the lateral extent of contamination in this phase of work rather than in additional future mobilizations. Please update your work plan to address this data gap.
6. **Utility Survey.** The utility survey presented did not include the depth of many of the utilities such as gas lines, and the utilities that are included appear blurry and difficult to read. Please include an updated map in the report requested below.

TECHNICAL REPORT REQUEST

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

- **April 6, 2009** –Soil and Water Investigation Work Plan Addendum

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.

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

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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) 639-1287 or send me an electronic mail message at barbara.jakub@acgov.org.

Sincerely,



Barbara Jakub, P.G.
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Valentin Constantinescu, Delta, 11050 White Rock Rd., Suite 110, Rancho Cordova, CA,
94670
Donna Drogos, ACEH
Barbara Jakub, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

Effective January 31, 2006, 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

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

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

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 dehloptoxic@acgov.org
 - or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
 - 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 and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - 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 dehloptoxic@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 at 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)