



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

November 4, 2011

Mr. John Buestad
Foley Street Investments LLC
2533 Clement Avenue
Alameda, CA 94501
(sent via electronic mail to:
john@buestad.com)

Mr. John F. Buono, Jr.
Good Chevrolet
P.O. Box 1730
Alameda, CA 94501

Subject: Request for a Pilot Test Work Plan; Fuel Leak Case No. RO0000008 and GeoTracker Global ID T0600100655, Good Chevrolet, 1630 Park Street, Alameda, CA 94501

Dear Messrs. Buestad and Buono:

Thank you for submitting the report entitled "Interim Corrective Action Plan" (ICAP) dated September 28, 2011 prepared by AEI Consultants, Inc. The ICAP proposed up to a 30 day high vacuum dual-phase extraction (HVDPE) interim remedial action including installation of three dual phase extraction (DPE) wells and an air sparge (AS) well. Alameda County Environmental Health (ACEH) staff has reviewed the referenced document and conclude that the document is an incomplete work plan for an HVDPE pilot test with some components of a Feasibility Study (FS) but not a Corrective Action Plan (CAP). Because no remedial action has been performed at the site, the purpose of this pilot test should be to gather information to determine if HVDPE is a viable remedial option at the site. We request that you address the following technical comments and submit the reports requested by the dates specified below.

TECHNICAL COMMENTS

1. **Request for Information:** To evaluate the site appropriately, ACEH requires submittal of electronic copies of all reports, data, correspondence, etc., related to all environmental investigations for this property including the Phase I Environmental Site Assessment referred to or otherwise incorporated in the referenced ICAP. Please submit these documents by the date requested below.
2. **Pilot Test Work Plan:** The ICAP did not provide adequate details concerning the design and implementation of the pilot test; consequently, we request submittal of a Pilot Test Work Plan prior to the start of field activities in which the following details are provided:
 - a. **Work Plan Schedule and Objectives:** The proposed development schedule calls for construction to begin no later than June 2012 with the primary objective being to remove source mass that may pose a threat to human health and act as a source for further groundwater impact, and a secondary objective to reduce the impact to soil and groundwater and control migration of the dissolved petroleum hydrocarbon plume. As proposed, the rationale provided in the alternative evaluation appears to contradict the choice of HVDPE as being the most expedient and cost effective remedial objective. Excavation and disposal is described as having the highest likelihood of being effective. Based on the

cost estimates provided in Appendix C, HVDPE is the most expensive method, particularly when estimated for an operation period of a minimum of six months or more, which is likely a more realistic period. In the Pilot Test Work Plan, please provide justification to support your stated site objectives.

After generating sufficient data to support a remediation technology, preparation of an FS/CAP is appropriate. The FS/CAP must include a concise background of soil and groundwater investigations performed in connection with this case and an assessment of the residual impacts of the chemicals of concern (COCs) for the site and the surrounding area where the unauthorized release has migrated or may migrate. The FS/CAP also includes, but is not limited to, a detailed description of site lithology, including soil permeability, and most importantly, contamination cleanup levels and cleanup goals, in accordance with the San Francisco Regional Water Quality Control Board (SFRWQCB) Basin Plan and appropriate Environmental Screening Levels (ESL) guidance for all COCs and for the appropriate groundwater designation. Soil cleanup levels should ultimately (within a reasonable timeframe) achieve water quality objectives (cleanup goals) for groundwater in accordance with the SFRWQCB Basin Plan. The FS/CAP is to include appropriate cleanup levels and cleanup goals and the time frame necessary to reach those goals, in accordance with 23 CCR Section 2725, 2726, and 2727.

The FS/CAP must evaluate at least three viable alternatives for remedying or mitigating the actual or potential adverse effects of the unauthorized release(s) besides the "no action" and "monitored natural attenuation" remedial alternatives. Each alternative shall be evaluated not only for cost-effectiveness but also its timeframe to reach cleanup levels and cleanup goals, and ultimately the Responsible Party must propose the most cost-effective corrective action. Public participation is a requirement for the CAP process. Potentially affected stakeholders who live or own property in the surrounding area of the proposed remediation must be notified through mailing of a fact sheet. The draft fact sheet is first reviewed by ACEH. Once the fact sheet has been approved, public comments on the proposed remediation will be accepted for a period of thirty days. Following the public comment period, the comments received including ACEH's comments, must be addressed and incorporated into a Final FS/CAP.

- b. Missing HVDPE Pilot Test Details:** Numerous critical field operations and monitoring details of the HVDPE pilot test are not specified; please provide details and back-up calculations in the Pilot Test Work Plan by the date identified below, that include but are not limited to the following:
- i. Discussion of permitting and treatment of extracted vapor and discussion of permitting, treatment, storage, and disposal of extracted groundwater;
 - ii. Rationale for the proposed location and construction of the AS well and the three DPE wells;
 - iii. Description of the number and sequence of wells to undergo HVDPE pilot testing and the criteria for continuing or discontinuing treatment in individual wells. Please utilize a table listing well pairs and a discussion of the supporting rationale behind the choice of well pair to be tested when each DPE well undergoes HVPDE. Please provide the rationale for the use of existing site monitoring wells as vapor monitoring points (VMPs) and/or the proposed locations of additional VPMS;
 - iv. Description of step tests to be performed to determine the optimal operating condition of extraction wells, including the number and duration of the step tests;

- v. Description of the aquifer testing that will be performed, including the wells to be tested and duration of the tests;
 - vi. Detailed written and graphical descriptions, including concentration versus time trend graphs, of the HVDPE test parameters to be collected during the HVDPE pilot test including radius of influence; wellhead vacuum rates, vapor extraction flow rates, groundwater levels, groundwater flow rates, vapor concentrations; and proposed stinger depth for contaminant reduction or dewatering purposes;
 - vii. Discussion of the method and frequency of soil vapor sample collection;
 - viii. Discussion of groundwater sampling including analysis for dissolved oxygen and the metals cadmium, chromium, lead, nickel, zinc;
 - ix. Site placement of the thermal oxidizer vapor phase abatement equipment;
 - x. Estimation of the soil volume to be treated and pore volume exchange rates and calculations;
 - xi. Calculations for the dimensions of the contaminated source volume and location of the approximate boundary of source mass area shown on a figure; evaluation of potential remedial options that will address residual mass beneath the sidewalk & street.
- c. Request for Preferential Pathway Study:** The ICAP states that a preferential pathway study requested in ACEH's January 16, 2008 directive letter was not completed. It appears that a partial but incomplete preferential pathway study was submitted. Please perform a complete preferential pathway study and discuss the results (including the detailed well survey and utility survey described below) and report your results in the Pilot Test Work Plan requested below. The results of your study shall contain all information required by California Code of Regulations, Title 23, Division 3, Chapter 16, §2654(b).

The purpose of the preferential pathway study is to locate potential migration pathways and conduits and determine the probability of a NAPL and/or a groundwater plume encountering preferential pathways and conduits that could spread contamination. We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, utility laterals, pipelines, and etc.) for vertical and lateral migration that may be present in the vicinity of the site.

- i. **Utility Survey** - An evaluation of all utility lines, utility laterals, and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s) is required as part of your study. Please reduce and synthesize available information and maps, and generate appropriate (vicinity and / or site specific) maps and cross-sections illustrating the location and depth of all utility lines and trenches within and near the site and plume areas(s) as part of your study.
- ii. **Well Survey** - The preferential pathway study shall include a detailed well survey of all wells (monitoring and production wells: active, inactive, standby, decommissioned (sealed with concrete), abandoned (improperly decommissioned or lost); and dewatering, drainage, and cathodic protection wells) within a ¼ mile radius of the subject site. Please use DWR as well as Alameda County Public Works Agency resources as the databases are sufficiently different

to warrant a review of both. As part of your detailed well survey, please perform a background study of the historical land uses of the site and properties in the vicinity of the site. Use the results of your background study to determine the existence of unrecorded/unknown (abandoned) wells, which can act as contaminant migration pathways at or from your site.

- d. **Groundwater Monitoring Data:** Please provide groundwater monitoring well data sheets and all supporting documentation referenced in the ICAP and used to support the Pilot Test Work Plan.
- e. **Data Presentation in all future reports:** Tables 1 through 8 present current and historical summaries of soil and groundwater analytical results, and groundwater elevations, many samples dating back to 1987. Graphical depictions of hydrograph and contaminant trends can provide useful means of demonstrating trends over long periods of time and relationships between seasonal groundwater levels and concentrations which may help to ensure proper well screen placement. Please include hydrograph and contaminant trend graphs for past and future data and evaluate dissolved contaminant plume migration with distance. Additionally, please include a sample depth column on all future soil (and groundwater, if applicable) analytical summary tables.

TECHNICAL REPORT REQUEST

Please submit the following reports to ACEH (Attention: Karel Detterman), according to the following schedule:

- **November 18, 2011 – Request for information**
- **January 20, 2012 – Pilot Test Work Plan**

Reports are 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. Should you have any questions, please contact me at (510) 567-6708 or send me an electronic mail message at karel.detterman@acgov.org.

Sincerely,

Karel Detterman, PG
Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations
Electronic Report Upload (ftp) Instructions

cc: JoAnn Stewart, Good Chevrolet, P.O. Box 1730, Alameda, CA 94501
Peter McIntyre, AEI Consultants, 2500 Camino Diablo, Walnut Creek, CA 94597 (Sent via E-mail to pmcintyre@aeiconsultants.com)

Donna Drogos, ACEH (Sent via E-mail to: donna.drogos@acgov.org)
Karel Detterman, ACEH (Sent via E-mail to: karel.detterman@acgov.org)
GeoTracker, Electronic Case File

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/).

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.

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