



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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December 12, 2008

Paul Supple
Atlantic Richfield Company
(A BP Affiliated Company)
P.O. Box 1257
San Ramon, CA 94583

Subject: Fuel Leak Case No. RO0000200 and GeoTracker Global ID T0600100113, ARCO #00771, 899 Rincon Avenue, Livermore, CA 94550

Dear Mr. Supple:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Third Quarter, 2008 Semi-Annual Ground-Water Monitoring Report," dated October 28, 2008, which was prepared by Broadbent and Associates, Inc. (BAI) for the subject site. Several site investigations were performed at the site including active remediation consisting of over-excavation in the vicinity of the former waste oil underground storage tank (UST), and operation of a vapor extraction system and installation of product skimmers in the vicinity of the former fuel USTs. However, potential data gaps identified below still remain unaddressed at the site.

ACEH requests that you address the following technical comments and send us the technical work plan and reports requested below

TECHNICAL COMMENTS

1. **Remediation System Performance & Effectiveness** – In February and December 1990, several borings were installed to evaluate possible hydrocarbon impact in the vicinity of the four USTs prior to their replacement. Soil sample analytical results detected total petroleum hydrocarbons (TPH) as gasoline (g) and benzene as high as 3,800 mg/kg and <1.5 mg/kg, respectively, in soil sample S-43-B4 collected at a depth of 43 feet below the ground surface (bgs) confirming that the soil had been impacted with petroleum hydrocarbons. Boring B-1 contained 1/8 of an inch of free product and MW-1 contained 1.92 inches (reported as 0.16 feet) of free product confirming that the groundwater had also been impacted. In December 1991, ROUX oversaw the removal of four single-wall USTs, consisting of one 10,000-gallon fiberglass, one 6,000-gallon fiberglass, and two 4,000-gallon steel USTs. TPH-g and benzene were detected as high 4,600 mg/kg and 28 mg/kg, respectively, in soil sample T4A collected on December 30, 1991 at a depth of 14 feet bgs.

A soil vapor extraction pilot test was conducted in December 1991. However, details of the system, including quantities of contaminant recovered, system effectiveness, etc. could not be found in reports in our case file. Please include a discussion to address the above mentioned concerns in the work plan due by the date specified below.

2. **Post Remediation Verification Sampling/Contaminant Source Area Characterization** –

In August 1987, Crosby and Overton Environmental Management removed on 240-gallon waste oil UST. Soil sample analytical results collected at 10 feet bgs detected 378 mg/kg TPH-g with BTEX not detected above the laboratory detection limit. The excavation pit was deepened to 12 feet bgs. Soil sample analytical results did not detect TPH-g or BTEX above the laboratory detection limit. Boring B-11 was installed in the former UST location in July 1991. Soil sample analytical results did not detect total oil and grease (TOG), TPH-diesel (d), TPH-g, or BTEX above the laboratory detection limit. Therefore, the former waste oil UST appears adequately assessed.

In December 1991, ROUX oversaw the removal of four single-wall USTs consisting of one 10,000-gallon fiberglass, one 6,000-gallon fiberglass, and two 4,000-gallon steel USTs. As mentioned above, significantly elevated concentrations of TPH-g and benzene (3,800 mg/kg and <1.5 mg/kg, respectively collected at 43 feet bgs) were detected in exploratory borings and significantly elevated concentrations of TPH-g and benzene (4,600 mg/kg and 28 mg/kg, respectively) were detected during the UST removals. ACEH is aware that a vapor extraction system operated at the site and an air diffusion system is currently being operated. However, we are uncertain of the effectiveness of the vapor extraction system since post remediation verification sampling does not appear to have been conducted at the site. Additionally, the vertical extent of the former source area(s) appears uncharacterized at this time. Please propose a scope of work to address the above-mentioned concerns and submit a work plan due by the date specified below.

3. **Site Conceptual Model** – Several site investigations have been performed at this site. However, based on our review of the case file, possible data gaps that do not appear to have been addressed are identified and detailed above. At this time, it may be advantageous to develop a site conceptual model (SCM), which synthesizes all the analytical data and evaluates all potential exposure pathways and potential receptors that may exist at the site, including identifying or developing site cleanup objectives and goals. At a minimum, the SCM should include:

- (1) Local and regional plan view maps that illustrate the location of sources (former facilities, piping, tanks, etc.) extent of contamination, direction and rate of groundwater flow, potential preferential pathways, and locations of receptors;
- (2) Geologic cross section maps that illustrate subsurface features, man-made conduits, and lateral and vertical extent of contamination;
- (3) Plots of chemical concentrations versus time;
- (4) Plots of chemical concentrations versus distance from the source;
- (5) Summary tables of chemical concentrations in different media (i.e. soil, groundwater, and soil vapor); and
- (6) Well logs, boring logs, and well survey maps;
- (7) Discussion of likely contaminant fate and transport.

If data gaps (i.e. soil delineation in source area(s), etc.) are identified in the SCM, please include a proposed scope of work to address those data gaps in the work plan due by the date specified below. Please note that the work plan must address all technical comments presented in this correspondence and all data gaps identified in the SCM.

REQUEST FOR INFORMATION

ACEH's case file for the subject site contains the following electronic reports as listed on our website (<http://www.acgov.org/aceh/lop/ust.htm>). You are requested to submit copies of all other reports related to environmental investigations for this property by **January 12, 2009**.

NOTIFICATION OF FIELDWORK ACTIVITIES

Please schedule and complete the fieldwork activities by the date specified below and provide ACEH with at least three (3) business days notification prior to conducting the fieldwork, including routine groundwater sampling.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Paresh Khatri), according to the following schedule:

- **February 10, 2009** – Soil and Water Investigation Work Plan & SCM
- **April 30, 2009** – Semi-annual Monitoring Report (1st Quarter 2009)
- **October 30, 2009** – Semi-annual Monitoring Report (3rd Quarter 2009)

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.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml).

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.

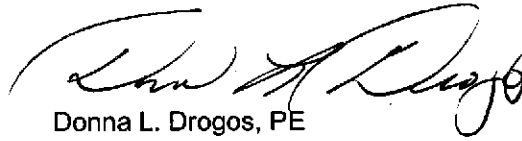
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If you have any questions, please call me at (510) 777-2478 or send me an electronic mail message at paresh.khatri@acgov.org.

Sincerely,



Paresh C. Khatri
Hazardous Materials Specialist



Donna L. Drogos, PE
Supervising Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Matthew Herrick, Broadbent & Associates, Inc., 2000 Kirman Avenue, Reno, NV 89502
Danielle Stefani, Livermore Pleasanton Fire Department, 3560 Nevada St, Pleasanton, CA 94566
Cheryl Dizon (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551
Donna Drogos, ACEH
Paresh Khatri, 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)