

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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FAX (510) 337-9335

June 13, 2008

Murray Stevens
Kamur Industries, Inc.
2351 Shoreline Drive
Alameda, CA 94501

George and Diane Ososke
440 Davis Court, #910
San Francisco, CA 94111-2426

Subject: Fuel Leak Case No. RO0000260 and Geotracker Global ID T0600101089, Plaza Car Wash, 400 San Pablo Avenue, Albany, CA 94706

Dear Mr. Stevens and Mr. and Ms. Ososke:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site, including the document entitled, "*Corrective Action Plan*," dated October 30, 2007 and received by ACEH on November 6, 2007. The *Corrective Action Plan* discusses several remedial technologies but does not present a comparison of the effectiveness or cost of the technologies.

Based on review of recent groundwater monitoring data and previous site characterization data, it appears that further investigation of plume extent to the southwest and the potential for off-site discharge to the nearby El Cerrito Creek is required. These data needs are discussed further in the technical comments below. Therefore, we request that you submit a work plan by **August 18, 2008** to address the technical comments below.

TECHNICAL COMMENTS

- 1. Surveying of the Creek Profile.** In order to help assess the hydrologic relationship between the creek and groundwater, we request that you obtain elevation data along a profile of El Cerrito Creek. The elevation of the concrete invert at the point where the creek enters the site near San Pablo Avenue is to be surveyed. Additional points along the creek profile should also be surveyed to allow comparison of surface water levels to groundwater levels. Please include plans to conduct the surveying in the Work Plan requested below.
- 2. Stiff Layer Encountered in Cone Penetrometer Borings.** Cone penetrometer (CPT) borings advanced at the site in November 2006 encountered a very stiff layer at depths of 22 to 24 feet bgs that prevented further advancement of the CPT probe. The January 10, 2007 Site Investigation Report that presented the CPT data, interpreted the layer to be indurated rock that acted as an aquitard to perch shallow groundwater. It is also possible that the stiff layer may consist of coarse colluvium or alluvium rather than rock. Coarse colluvial or alluvial material would not act as an aquitard but could instead provide a preferential pathway for

contaminant transport. We request that you propose further investigation to assess the nature of the stiff layer and whether the layer is providing a transport pathway for discharge to El Cerrito Creek at a downstream location. Please include these plans in the Work Plan requested below.

3. **Plume Extent to the Southwest.** During the February 20, 2008 groundwater monitoring event, groundwater from well STMW-6 contained 19,000 micrograms per liter ($\mu\text{g/L}$) of TPHg and 4,100 $\mu\text{g/L}$ of benzene. Well STMW-6 is located southwest of the former USTs. The apparent hydraulic gradient for the site has been to the southwest during most recent groundwater monitoring events. No monitoring wells are located further downgradient from well STMW-6. We request that you propose further investigation to define the downgradient extent of the plume and the potential for the plume to discharge to El Cerrito Creek some distance further to the west. Please include these plans in the Work Plan requested below.
4. **Potential for Vapor Intrusion.** We request that you propose soil vapor sampling to evaluate the potential for vapor intrusion to indoor air for current and potential future land use. Please present these plans in the Work Plan requested below.
5. **Monitoring Storm Drain Outfall to El Cerrito Creek.** Based on recent results, sampling of El Cerrito Creek and the storm drain outlet to El Cerrito Creek may be discontinued at this time. The need for sampling of El Cerrito Creek may be re-evaluated pending the results of additional investigation.
6. **Groundwater Monitoring.** Groundwater samples collected in the area of Norge Dry Cleaners are to be analyzed for both fuel hydrocarbons and chlorinated solvents. Groundwater samples collected from wells STMW-1, STMW-2, STMW-3, and STMW-4 are to be analyzed for TPH as gasoline and BTEX. Groundwater samples collected from wells MW-2, MW-3, and STMW-5 are to be analyzed for TPH as gasoline, BTEX, and chlorinated solvents. Please present the results in the quarterly monitoring reports requested below.

TECHNICAL REPORT REQUEST

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

- **August 18, 2008** – Work Plan
- **August 20, 2008** – Quarterly Groundwater Monitoring Report for Second Quarter 2008
- **October 20, 2008** – Quarterly Groundwater Monitoring Report for Third Quarter 2008

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/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.

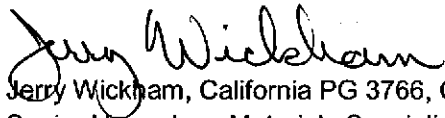
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AGENCY OVERSIGHT

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) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Frank Hamedi-Fard, Enviro Soil Tech Consultants, 131 Tully Road, San Jose, CA 95111

Donna Drogos, ACEH
Jerry Wickham, 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)