

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

March 5, 2008

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 International Blvd.
Oakland, CA 94601

Subject: Fuel Leak Case No. RO0000265 and Geotracker Global ID T0600101680, Tony's Express Auto Services, 3609 International Blvd., Oakland, CA 94601

Dear Mr. Razi:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted documents entitled, "*Multi-Phase Extraction Pilot Test*," dated February 13, 2008 and "*Fourth Quarter 2007 Groundwater Monitoring and Remediation System Operation Report*," dated February 13, 2008. Both reports were prepared on your behalf by SOMA Environmental Engineering, Inc. The "*Multi-Phase Extraction Pilot Test*," presents the results from a multi-phase extraction (MPE) pilot test conducted using monitoring wells MW-1 and MW-3. Based on results from the MPE pilot test, induced vacuum extended 35 to 42 feet from the extraction wells. Over 94 hours of operation during the MPE pilot test, an estimated 64 pounds of volatile organic compounds was removed. The MPE Pilot Test Report recommends monthly MPE events until extracted soil vapor concentrations reach an asymptotic level.

Performance of monthly MPE events is acceptable provided that the technical comments below are addressed during implementation of the monthly MPE events. Following implementation of a maximum of four monthly MPE events, the effectiveness of MPE using the existing wells is to be evaluated prior to continuing monthly MPE events using wells MW-1 and MW-3. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Number of MPE Events.** Performing monthly MPE events over a period up to four months is acceptable provided that mass removal rates do not decrease to less than three pounds per day. Following no more than four monthly MPE events, we request that the effectiveness of the MPE events be evaluated to determine whether MPE should be continued for the site. Please see technical comments 2 and 3 regarding data collection during the MPE events. Please present results from the MPE events in the reports requested below.
2. **Data Collection during MPE Events.** We request that you periodically record operational parameters during each MPE event to estimate extraction and VOC mass removal rates. The system operational parameters presented in Table 1 of the "*Multi-Phase Extraction Pilot*

Test," report, with the exception of observation well data, are to be recorded and presented in the reports requested below. Estimates of daily mass removal and cumulative mass removal are to be presented for each well.

- 3. Soil Vapor Samples.** During the fourth monthly MPE event, we request that you collect two influent vapor samples from each extraction well. The first soil vapor sample is to be collected during the first 24 hours of operation and the second soil vapor samples is to be collected near the end of extraction. Influent soil vapor samples are to be collected from the sampling port on the vacuum pump discharge manifold. The soil vapor samples are to be analyzed for total petroleum hydrocarbons as gasoline using EPA Method TO-3 and BTEX and MTBE using EPA Method TO-15. Please present the results in the August 15, 2008 Groundwater Monitoring and Remediation System Operation Report requested below.

TECHNICAL REPORT REQUEST

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

- **May 15, 2008** – Groundwater Monitoring and Remediation System Operation Report
- **August 15, 2008** – Groundwater Monitoring and Remediation System Operation Report with Evaluation of Effectiveness of Monthly MPE

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.

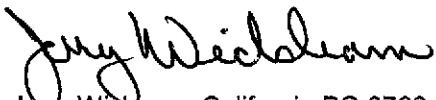
AGENCY OVERSIGHT

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 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) 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: Mansour Sepehr, SOMA Environmental Engineering, Inc., 6620 Owens Drive, Suite A
Pleasanton, CA 94588-3334

Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA
94612-2032

Donna Drogos, ACEH
Jerry Wickham, ACEH
File