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Alameda County
Environmental Health



January 31, 2008

Our Ref.: 053-7020

Alameda County Environmental Health Services
Environmental Protection
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

Attention: Ms. Donna Drogos

RE: PILOT TEST CONTINUATION SCHEDULE UPDATE, FUEL LEAK CASE NO. RO000278, FORMER DESERT PETROLEUM, 2008 1ST STREET, LIVERMORE, CALIFORNIA

Dear Ms. Drogos:

Golder Associates Inc. (Golder) has prepared this letter on behalf of Valley Gas (Formerly B&C Minimart) for the Desert Petroleum (DP) site at 2008 1st Street, Livermore, California. Golder conducted the first portion of an air-sparging pilot test consistent with a remediation plan¹ and subsequent addendum² submitted to the Alameda County Environmental Health Services (ACEHS). The implementation schedule was revised³, the pilot test was halted early due to falling groundwater levels, and a Pilot Test Report was submitted on December 7, 2007.⁴ Groundwater levels at the site were measured following the recent abundant rainfall and the water levels have increased several feet. The rise in groundwater levels has been sufficient to re-saturate the source zone and both sparge point depth zones (see hydrograph on next page). As a result, Golder recommends continuing the air-sparging pilot test with the revised implementation schedule (attached).

The pilot test continuation will enable the complete data evaluation that was included in the original pilot test workplan. The following provides a brief summary of the proposed pilot test continuation tasks and follows the proposed continuation schedule.

The sparge unit will be re-installed and sparging will occur in both sparge points SP-1A and SP-1B. Note that during the initial pilot test, SP-1A was not used because groundwater levels had fallen below the screened portion of the upper sparge point. The sparge test will run for two weeks, likely at a more continuous rate than the initial test, which was limited to approximately 10 minutes every hour due to the low groundwater level. The pilot test will be stopped and rebound monitoring will follow. After rebound sampling the system will be turned back on and air sparging will continue in one or more of the on-site sparge points. Recommendations for the final remedial approach for on-site and downgradient areas will be presented in a corrective action plan.

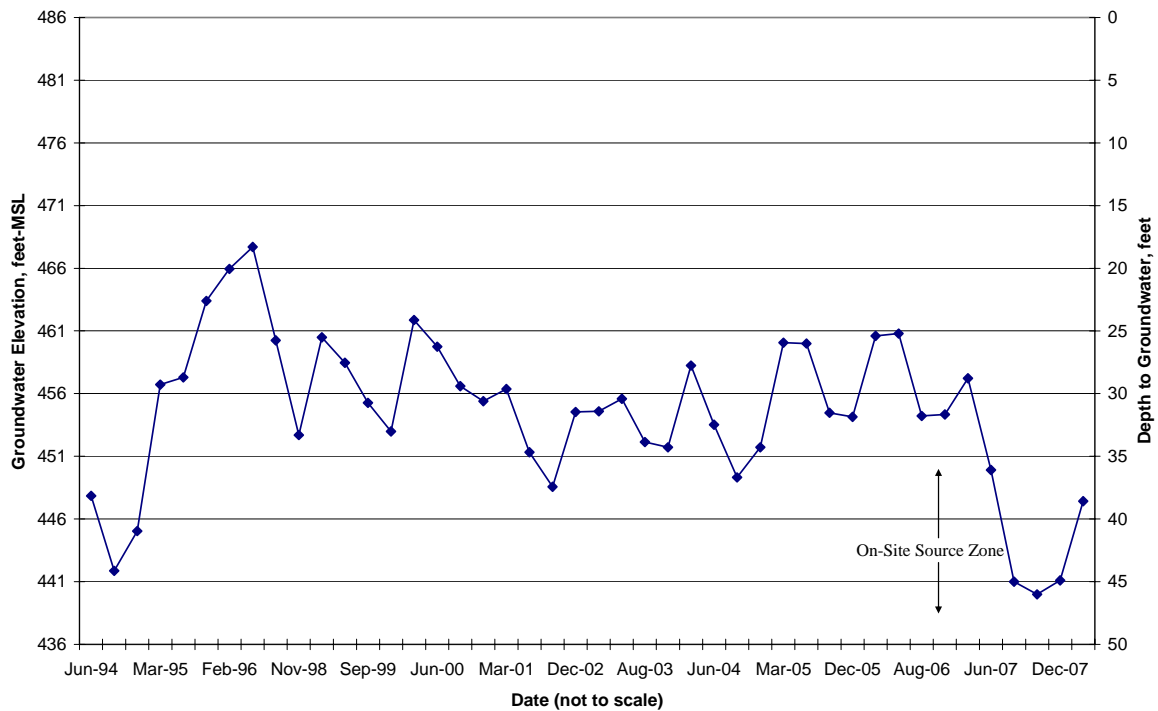
¹ Golder Associates, Inc., *Source Zone Remediation Plan*, August 11, 2006.

² Golder Associates, Inc., *Revised Source Zone Remediation Plan Addendum*, June 28, 2007.

³ Golder Associates Inc., *Pilot Test Performance and Schedule Update*, November 30, 2007.

⁴ Golder Associates Inc., *Pilot Test Report*, December 7, 2007.

Well MW-2 Hydrograph



We propose to begin the pilot test continuation on February 11, 2008. However, the pilot test will not continue until we receive concurrence from Alameda County Environmental Health Services.

If you have any questions or comments, please call Kris Johnson at 650-386-3828 or Mark Naugle at 916-786-2424.

Sincerely,

GOLDER ASSOCIATES INC.

Kris H. Johnson, C.E.G. 1763
Senior Consultant

Attachments: Revised Pilot Test Continuation Schedule
Pilot Test Schedule

Distribution:

- (1) Copy – Mr. Balaji Angle (hardcopy)
- (1) Copy – Ms. Donna Drogos, ACEHS (electronic upload)
- (1) Copy – GeoTracker Database (submitted electronically)
- (1) Copy – Mr. Michael Veiluva (electronic)
- (1) Copy – Ms. Chris Davidson, City of Livermore (electronic)
- (1) Copy – Mr. Michael Bordoni, Barry Swenson Builders (electronic)

Revised Pilot Test Continuation Schedule

ACTIVITY	RATIONALE/PURPOSE	APPROXIMATE SCHEDULE
Collect samples from onsite sparge points surrounding SP-1	"A" screens have not been sampled yet and we need to re-assess the baseline before continuing the test	2/4/08 to 2/8/08
Sparging unit delivery and reconnection	Rental unit delivery, connect electrical, and connect conveyance lines	2/11/08 to 2/12/08
Continuous testing on SP-1A and SP-1B	Assess ROI, mass reduction rate, and rebound	2/13/2008 to 2/26/08
Monitor vapors in head space of onsite, inactive sparge points.	Indicates ROI and confirms ozone mass transfer	2/15/2008 and 2/22/08
Stop continuous testing on SP-1A and SP-1B	Assess rebound	2/26/2008
Collect initial rebound samples	Provide comparison with results from samples collected after the rebound period	2/27/08 to 2/29/08
Resting period	Allow soil and groundwater to re-equilibrate	2/27/08 to 3/19/08
Perform rebound sampling	Provides an indication of the effectiveness of ozone sparging to reduce mass of adsorbed petroleum hydrocarbons	3/19/2008
Begin onsite operations	Reduce petroleum hydrocarbon mass onsite and provide DO for enhanced natural attenuation downgradient	3/26/2008
Prepare Corrective Action Plan	Recommend final remedial approach for site and downgradient areas	3/26/08 through 4/18/2008

ID	Task Name	Duration	Start	Finish	Predecessors	February				March				April				May
						W28	W29	W30	W31	W32	W33	W34	W35	W36	W37	W38	W39	W40
1	Encroachment Permit	0 days	Fri 8/17/07	Fri 8/17/07														
2	Install Wells	5 days	Mon 8/27/07	Fri 8/31/07														
3	Procure Ozone System	15 days	Mon 8/6/07	Fri 8/24/07														
4	Install Ozone System	1 day	Mon 11/12/07	Mon 11/12/07														
5	Pilot Study	223 days	Mon 9/10/07	Wed 7/16/08														
6	Baseline Monitoring (with QM?)	2 days	Mon 9/10/07	Tue 9/11/07	2FS+5 days													
7	Initial Pilot Testing	2 days	Tue 11/13/07	Wed 11/14/07	4													
8	Continuous Testing	24 days	Mon 11/19/07	Thu 12/20/07														
9	Resume Continuous Testing	10 days	Wed 2/13/08	Tue 2/26/08	7FS+2 days													
10	Vapor Monitoring	6 days	Wed 2/20/08	Wed 2/27/08	9SS+5 days													
11	Vapor Monitoring 1	1 day	Wed 2/20/08	Wed 2/20/08														
12	Vapor Monitoring 2	1 day	Wed 2/27/08	Wed 2/27/08														
13	Treatment Zone Well Monitoring	11 days	Wed 2/13/08	Wed 2/27/08														
14	Treatment Zone Well Monitoring 1	1 day	Wed 2/13/08	Wed 2/13/08														
15	Treatment Zone Well Monitoring 2 (perform with rebound)	1 day	Wed 2/27/08	Wed 2/27/08														
16	Down Gradient Well Monitoring	101 days	Wed 2/27/08	Wed 7/16/08	9													
17	Down Gradient Well Monitoring 1 (Perform with rebound)	1 day	Wed 2/27/08	Wed 2/27/08														
18	Down Gradient Well Monitoring 2 (perform with rebound)	1 day	Wed 3/19/08	Wed 3/19/08														
19	Down Gradient Well Monitoring 3	1 day	Wed 4/16/08	Wed 4/16/08														
20	Down Gradient Well Monitoring 4	1 day	Wed 5/21/08	Wed 5/21/08														
21	Down Gradient Well Monitoring 5	1 day	Wed 6/18/08	Wed 6/18/08														
22	Down Gradient Well Monitoring 6	1 day	Wed 7/16/08	Wed 7/16/08														
23	Rebound Assessment	17 days	Wed 2/27/08	Thu 3/20/08														
24	Initial Sampling	2 days	Wed 2/27/08	Thu 2/28/08	9													
25	Rebound Sampling	2 days	Wed 3/19/08	Thu 3/20/08	24FS+13 days													
26	Prepare Corrective Action Plan	18 days	Wed 3/26/08	Fri 4/18/08	25FS+3 days													
27																		
28																		
29	QUARTERLY MONITORING SCHEDULE	2 days	Mon 12/17/07	Tue 12/18/07														
30	QUARTERLY MONITORING SCHEDULE	2 days	Wed 3/19/08	Thu 3/20/08	29FS+65 days													

Project: Pilot Test Schedule 11-26-07
Date: Thu 1/31/08

Task: Progress: Summary: External Tasks: Deadline: Split: Milestone: Project Summary: External Milestone:

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