ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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October 23, 2008

Mr. Seung Lee
German Autocraft
350 Cheerywood Avenue
San Leandro, CA 94577-1713

Subject: LOP Case No. RO0000302 (global ID# T0600100639), German Autocraft, 301 East 14th Street, San Leandro, CA

Dear Mr. Lee:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted document entitled, "Work Plan for Soil Vapor Investigation" and "Work Plan for DPE/AS Feasibility Study," both received on February 20, 2008 and prepared by Groundwater Cleaners Inc (GCI). GCI recommends a soil vapor investigation to evaluate contamination in the vadoze zone, assess the vapor intrusion pathway and evaluate potential risk associated with the vapor intrusion pathway. Additionally, GCI proposes a feasibility study to evaluate the feasibility of DPE/AS. ACEH generally agrees with the proposed DPE/AS feasibility study and the soil vapor investigation.

Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to mailto:steven.plunkett@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Dual Phase Vapor Extraction and Air Sparging (DPE/AS) Pilot Test.** High concentrations of up to 580,000 µg/L TPHg and 29,000 µg/L benzene have been detected in groundwater and 6,300 mg/kg TPHg and 110 mg/kg benzene have been detected soil beneath the site. GCI has proposed a feasibility study and pilot test using DPE/AS to evaluate the efficacy of the proposed remedial alternative to mitigate residual contamination in soil and groundwater. GCI proposes using existing monitoring wells for the pilot test; however, the well construction and screen interval of the existing monitoring wells may not be ideally suited for this purpose.

   Prior to beginning the DPE/AS pilot test, well construction details must be evaluated to determine if the monitoring well can be used for the pilot test. If it is determined that existing monitoring wells are not appropriate for the pilot test, then new extraction wells must be designed and installed. Furthermore, an in depth review of site geology and hydrogeology including soil permeability, hydraulic conductivity and soil moisture content, at a minimum, must be completed before the start of the DPE/AS pilot test. In addition, GCI has proposed the installation of two air sparge points to enhance recovery of dissolved phase hydrocarbon contamination. Please present the results from your review of monitoring well construction details and site geology and hydrogeology in the soil and groundwater investigation report requested below.

2. **Proposed Soil Vapor Assessment**. GCI has proposed the advancement of soil borings to first encountered groundwater, and collecting a grab-groundwater sample at approximately 28 feet bgs. GCI then proposes the

installation of dual completion soil vapor sampling point, with vapor sampling intervals at 5 feet bgs and 20 feet bgs, within the same boring. ACEH generally agrees with the soil vapor probe construction; however, ACEH does not agree with the use of the same soil boring to install a soil vapor probe and collect a grab groundwater sample. We request that you install a hydropunch boring exclusively for groundwater sampling, and then install the soil vapor probe next to the hydropunch boring. Moreover, ACEH recommends that soil vapor wells or probes are constructed with the sampling device and all fittings placed under a shroud with pliable weather-stripping along its base to maintain a tracer gas atmosphere. The shroud should ensure that there is tracer gas around all sampling connections. The shroud should have a port for inserting a monitoring and sampling device (e.g. Photo Ionization Detector) to ensure that tracer gas atmosphere is maintained. In addition, we request that a total of 8 soil vapor probes be installed (see attached figure for the vicinity of the additional soil vapor points.) Our request for the additional soil vapor points is to assess the potential impact to the adjacent residences. ACEH request that you perform all soil vapor sampling be preformed in accordance with the January 2003 DTSC "Advisory for Active Soil Gas Investigations". Please present results from the soil vapor sampling in the soil and groundwater investigation report requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Steven Plunkett), according to the following schedule:

- **December 30, 2008** – Soil and Groundwater Investigation Report

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.

If you have any questions, please call me at (510) 383-1767 or send me an electronic mail message at steven.plunkett@acgov.org.

Sincerely,

Steven Plunkett
Hazardous Materials Specialist

Donna Drogos, PE
Supervising Hazardous Materials Specialist

cc: Glen Reierstad
GCI
347 Frederick Street
San Francisco, CA 94117

Donna Drogos ACEH, Steven Plunkett ACEH, File