



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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October 24, 2008

Scott Anderson
Dublin Toyota
6450 Dublin Court
Dublin, CA 94568

Nolan Davis
Nolan M. & Velia E. Davis Trust
50 Oak Court, Suite 160
Danville, CA 94526-4039

Subject: Fuel Leak Case No. RO0000333 and Geotracker Global ID T0600102153, Dublin Toyota Pontiac, 6450 Dublin Court, Dublin, CA 94568

Dear Messrs. Anderson & Davis:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Second Quarter 2008 Groundwater Monitoring Report," dated August 27, 2008, which was prepared by Gribi Associates for subject site. In June 1998, Scott Company removed two 2,000-gallon gasoline and one 1,000-gallon waste oil underground storage tanks (USTs) from the site. Between December 1998 and May 2006, several groundwater monitoring wells to delineate the vertical and lateral extent of contamination as well as two dual phase extraction (DPE) wells were installed at the site. MTBE has been detected in the shallow A Zone water bearing unit as well as the deeper B Zone water bearing unit. Based on the analytical results, the vertical and lateral extent of the MTBE contaminant plume remains undefined and active remediation to mitigate the elevated concentrations of contaminants detected at the site appear warranted.

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

TECHNICAL COMMENTS

1. **Contaminant Source Area Characterization** – On June 10, 1998, three USTs (two utilized to store gasoline and one utilized to store waste oil) were excavated and removed from the site. Confirmation soil sample analytical results detected total petroleum hydrocarbons (TPH) as gasoline (g), diesel (d), benzene, and methyl tertiary butyl ether (MTBE) at concentrations of 2,000 milligrams per kilogram (mg/kg), 720 mg/kg, 5.5 mg/kg, 30 mg/kg, respectively, in soil sample PIT-1-EAST, indicating that the vertical and lateral extent of soil contamination in the source area is undefined. A groundwater sample collected from the excavation pit detected TPH-g, benzene, and MTBE at concentrations of 160,000 µg/L, 6,300 µg/L, and 52,000 µg/L, respectively, indicating that the groundwater has also been significantly impacted. Please propose a scope of work to address the above-mentioned concerns and submit a work plan due by the date specified below.
2. **Soil and Groundwater Characterization** – As mentioned above, between December 1998 and May 2006, several groundwater monitoring wells to delineate the vertical and lateral extent of contamination were installed. In Table 1 of the May 15, 2006 "SWI Summary of

Findings" report, monitoring well construction details are summarized. However, the boring logs and monitoring well completion details were not included. Please submit the boring logs and monitoring well completion forms in the SWI Addendum requested below.

Currently, the shallow A Zone water bearing unit and the deeper B Zone water bearing unit have been impacted with significant concentrations of MTBE and tertiary butyl alcohol (TBA). In the shallow water bearing unit, MTBE and TBA have been detected at concentrations of 4,300 µg/L and 1,100 µg/L, respectively, in a groundwater sample collected on June 4, 2008 from down-gradient monitoring well MW-7, indicating that the lateral extent of the groundwater contaminant plume is undefined. In the deeper water bearing unit, MTBE and TBA have been detected at concentrations of 5,500 µg/L and 1,400 µg/L, respectively in a groundwater sample collected on June 4, 2008 from down-gradient monitoring well MW-9, indicating that the vertical and lateral extent of the groundwater contaminant plume is undefined. One of the criteria that must be addressed for case closure consideration is to demonstrate that the vertical and lateral extent of the groundwater contaminant plume is defined. Although Interstate 580 lies on the southern property boundary in the down-gradient direction, it may not limit the lateral migration of the contaminant plume. Please propose a scope of work to address the above-mentioned concerns and submit a work plan due by the date specified below.

3. **Preferential Pathway Study** - Depth to groundwater at the site has been measured as shallow as four feet below the ground surface (bgs). Since groundwater is relatively shallow at the site, a preferential pathway evaluation appears prudent. The purpose of the preferential pathway study is to locate potential migration pathways and conduits and determine the probability of the NAPL and/or plume encountering preferential pathways and conduits that could spread contamination. We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for vertical and lateral migration that may be present in the vicinity of the site.

Discuss your analysis and interpretation of the results of the preferential pathway study (including the detailed well survey and utility survey requested below) and report your results in the soil and groundwater investigation work plan requested below. The results of your study shall contain all information required by California Code of Regulations, Title 23, Division 3, Chapter 16, §2654(b).

a. Utility Survey

An evaluation of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s) is required as part of your study. Please include maps and cross-sections illustrating the location and depth of all utility lines and trenches within and near the site and plume areas(s) as part of your study.

b. Well Survey

The preferential pathway study shall include a detailed well survey of all wells (monitoring and production wells: active, inactive, standby, decommissioned (sealed with concrete), abandoned (improperly decommissioned or lost); and dewatering, drainage, and cathodic

protection wells) within a ¼ mile radius of the subject site. As part of your detailed well survey, please perform a background study of the historical land uses of the site and properties in the vicinity of the site. Use the results of your background study to determine the existence of unrecorded/unknown (abandoned) wells, which can act as contaminant migration pathways at or from your site. Please review and submit copies of historical maps, such as Sanborn maps, aerial photographs, etc., when conducting the background study.

4. **Feasibility Study Testing** – On July 29, 2005, two DPE wells were installed at the site. According to Gribi Associates, seven four-hour Aggressive Fluid Vapor Recovery events were conducted at the site with limited success. However, concentrations of contaminants at the site are still elevated. Once the contaminant source areas are adequately characterized, a Feasibility Study/Corrective Action Plan (FS/CAP) prepared in accordance with Title 23, California Code of Regulations, Section 2725 appears appropriate. The FS/CAP must include a concise background of soil and groundwater investigations performed in connection with this case and an assessment of the residual impacts of the chemicals of concern (COCs) for the site and the surrounding area where the unauthorized release has migrated or may migrate. The FS/CAP should also include, but not limited to, a detailed description of site lithology, including soil permeability, and most importantly, contamination cleanup levels and cleanup goals, in accordance with the San Francisco Regional Water Quality Control Board Basin Plan and appropriate ESL guidance for all COCs and for the appropriate groundwater designation. Please note that soil cleanup levels should ultimately (within a reasonable timeframe) achieve water quality objectives (cleanup goals) for groundwater in accordance with San Francisco Regional Water Quality Control Board Basin Plan. Please propose appropriate cleanup levels and cleanup goals in accordance with 23 CCR Section 2725, 2726, and 2727 in the FS/CAP.

The FS/CAP must evaluate at least three viable alternatives for remedying or mitigating the actual or potential adverse effects of the unauthorized release(s) besides the “no action” and “monitored natural attenuation” remedial alternatives. Each alternative shall be evaluated for cost-effectiveness and the Responsible Party must propose the most cost-effective corrective action. Please note that the costs of the previously installed DPE wells should be subtracted from remedial alternatives that utilized the wells.

5. **Groundwater Contaminant Plume Monitoring** – Quarterly groundwater monitoring has been conducted at the site since December 1998. Since several years of quarterly monitoring data exists, your consultant may propose and justify an alternate groundwater monitoring plan for review. This may be incorporate this into the above requested work plan.
6. **GeoTracker and ACEH FTP Server Compliance** - A review of the case file and the State Water Resources Control Board's (SWRCB) GeoTracker website indicate that electronic copies of recent analytical data have not been submitted, rendering the site to non-compliance status. Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. Also, beginning January 1, 2002, all permanent monitoring points utilized to

collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude to sub-meter accuracy using NAD 83. A California licensed surveyor may be required to perform this work. Additionally, pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3893, 3894, and 3895, beginning July 1, 2005, the successful submittal of electronic information (i.e. report in PDF format) shall replace the requirement for the submittal of a paper copy. Additionally, not all reports that have been uploaded to GeoTracker have been uploaded to ACEH's FTP Server, as required. Please reconcile both GeoTracker and ACEH's FTP Server and upload the appropriate EDFs and PDF reports due by the date specified below.

REQUEST FOR INFORMATION

ACEH's case file for the subject site contains the following reports 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 (including reports submitted to GeoTracker) by **November 24, 2008**.

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.

TECHNICAL REPORT REQUEST

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

- **November 24, 2008** – GeoTracker and ACEH FTP Server Uploads & the SWI Addendum
- **January 21, 2009** – Soil and Water Investigation Work Plan (with Preferential Pathway Evaluation)
- **January 30, 2009** – Quarterly Monitoring Report (4th Quarter 2008)
- **April 30, 2009** – Quarterly Monitoring Report (1st Quarter 2009)
- **July 30, 2009** – Quarterly Monitoring Report (2nd Quarter 2009)
- **October 30, 2009** – Quarterly 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.

Messrs. Anderson & Davis
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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) 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: James Gribi, Gribi Associates, 1090 Adams Street, Suite K, Benicia, CA 94510
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)