



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

February 19, 2009

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, "Soil and Groundwater Investigation Work Plan," dated January 8, 2009, which was prepared by Gribi Associates (Gribi) for the subject site. In ACEH's October 24, 2008 correspondence, we requested contaminant source area characterization, soil and groundwater characterization down-gradient, and a preferential pathway evaluation. Gribi states that additional source area characterization is "unlikely to provide meaningful data," but has proposed a CPT boring investigation to address the soil and groundwater characterization down-gradient and preferential pathway evaluation.

ACEH conceptually concurs with the proposed scope of work, but requests that you address the following technical comments and send us work plan addendum described below.

#### **TECHNICAL COMMENTS**

1. **Contaminant Source Area Characterization** – Gribi states that it is now difficult to evaluate subsurface conditions in the vicinity of the former USTs since "an automobile carwash/detail building was erected over the former excavation." Gribi further states that concentrations of contaminants have declined from the grab groundwater sample collected from the open excavation in 1998, which detected TPH-g, benzene, MTBE at concentrations of 160,000 micrograms per liter ( $\mu\text{g/L}$ ), 6,300  $\mu\text{g/L}$ , and 52,000  $\mu\text{g/L}$ , respectively, to concentrations of TPH-g, benzene, and MTBE detected at 10,000  $\mu\text{g/L}$ , 500  $\mu\text{g/L}$ , 18,000  $\mu\text{g/L}$ , respectively following the Aggressive Fluid Vapor Recovery (AFVR) activities conducted in 2006. Gribi concludes that "[r]esults from the previous site investigations and interim remedial measures appear to provide sufficient information to adequately characterize the former UST source area.

ACEH respectfully disagrees with Gribi's assessment. While the concentrations have declined, they are still significantly elevated. Although not discussed in the above-mentioned work plan, elevated concentrations of TPH-g, TPH-d, benzene, and MTBE were detected in soil 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. The vertical and later extent of soil contamination is unknown at this time. Additionally, the concentrations of contaminants

Dear Messrs. Anderson & Davis  
RO0000333  
February 19, 2009, Page 2

detected in soil and groundwater appear to pose a risk to human health (i.e. contaminant volatilization from soil and/or groundwater to indoor air) and the environment (i.e. potential leaching from soil to groundwater). Lastly, in order to adequately evaluate remediation technologies that are likely to successfully and cost-effectively cleanup the site, it is prudent to evaluate the magnitude of the soil and groundwater impact. Please address the above-mentioned concerns and submit a work plan addendum due by the date specified below.

2. **CPT Boring Investigation** – Gribi proposes to install seven CPT borings to assess the soil and groundwater contamination at the site. Some of the proposed boring locations down-gradient appear rather distant from the axis of the groundwater contaminant plume and thus may not yield analytical data that may aid in contaminant plume definition. Therefore, it is recommended that the furthest west boring onsite be relocated approximately 40 feet to the east towards the axis of the groundwater contaminant plume. The east and west boring locations off-site also appear quite distant from the centerline of the potential groundwater contaminant plume. It is recommended that the east and west boring locations are relocated approximately 80 feet towards the center boring. Please include a revised figure illustrating the proposed CPT boring locations in the work plan addendum due by the date specified below.

#### **TECHNICAL REPORT REQUEST**

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

- **March 27, 2009** – Soil and Water Investigation Work Plan Addendum
- **April 30, 2009** – Quarterly Monitoring Report (1<sup>st</sup> Quarter 2009)
- **July 30, 2009** – Quarterly Monitoring Report (2<sup>nd</sup> Quarter 2009)
- **October 30, 2009** – Quarterly Monitoring Report (3<sup>rd</sup> Quarter 2009)
- **January 30, 2010** – Quarterly Monitoring Report (4<sup>th</sup> 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

Dear Messrs. Anderson & Davis  
RO0000333  
February 19, 2009, Page 3

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](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.

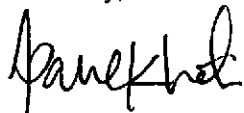
#### AGENCY OVERSIGHT

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.

Dear Messrs. Anderson & Davis  
RO0000333  
February 19, 2009, Page 4

If you have any questions, please call me at (510) 777-2478 or send me an electronic mail message at [paresh.khatri@acgov.org](mailto: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  
SWRCB GeoTracker Website  
File

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>ISSUE DATE:</b> July 5, 2005
	<b>REVISION DATE:</b> December 16, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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](mailto: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](mailto: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](mailto: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)