

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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March 19, 2008

Mr. Harold Turner
Snow Cleaners, Inc.
38 Sonora Street W
Stockton, CA 95203

Subject: Fuel Leak Case No. RO0000357 and Geotracker Global ID T0600101294, Snow Cleaners, 2678 Coolidge Avenue, Oakland 94601

Dear Mr. Turner:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the work plan entitled, "Subsurface Investigation Work Plan (SG1 through SG5, B12, B15 through B27, MW3 and MW4)," dated September 28, 2007 and received by ACEH on February 22, 2008. The Work Plan, which was prepared on your behalf by P & D Environmental, proposes the collection of soil, soil vapor, and groundwater samples to further characterize the horizontal and vertical extent of contamination. We request minor modifications to the scope of work and further description of the proposed method for soil vapor sampling. Therefore, we request that you submit a Revised Work Plan that addresses the following technical comments.

TECHNICAL COMMENTS

1. **Proposed Boring Locations.** The proposed boring locations are generally acceptable. However, we request that you propose one additional boring or adjust the proposed locations of borings B23 and B24 in order to assess the stratigraphy between well MW2 and boring B7. Cross section A-A' in the Subsurface Investigation Report dated June 19, 2007 presents an interpretation that a silty sand layer encountered approximately 21 to 25 feet bgs in boring B13 may correlate to a coarse-grained layer in boring B7. In order to assess whether these layers may correlate and to help assess how contamination from the "perched zone" encountered in boring MW2 is reaching the lower water-bearing interval encountered in boring B7, we request that you revise the Work Plan to include one boring between MW2 and boring B7.
2. **Length of Wells Screens and Filter Pack.** Based on the difference between water levels in monitoring wells MW1 and MW2, a downward vertical gradient exists at the site. In order to prevent possible cross contamination of lower zones, we request that you limit the vertical length of the filter pack for proposed wells MW3 and MW4 to no greater than 10 feet. The total depth of the well is to be determined in the field based on the depth at which the targeted coarse-grained interval is encountered. Please revise the work plan accordingly.

3. **Soil Vapor Sampling.** The Work Plan currently describes the analytical methods to be used for soil vapor analysis but the sampling method is not described. Please include a section in the Revised Work Plan to describe the proposed methods for soil vapor sampling.

TECHNICAL REPORT REQUEST

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

- **May 9, 2008** – Revised Work Plan

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. ACEH notes the discussion of UST Cleanup Fund cost pre-approval in your December 23, 2005 correspondence.

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.

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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

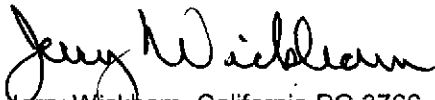
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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) 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: Paul King, P & D Environmental, 55 Santa Clara Avenue, Suite 240
Oakland, CA 94610

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

Donna Drogos, ACEH
Jerry Wickham, ACEH
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