

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
9-7-06

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

September 7, 2006

Rita Sullins
Don Sul, Inc.
187 North L Street
Livermore, CA 94550

Jennifer Sedlacheck
Exxon Mobil
4096 Piedmont, #194
Oakland, CA 94611

Subject: Fuel Leak Case No. RO0000394, Arrow Rentals, 187 North L Street, Livermore, CA –
Request for Schedule Extension

Dear Ms. Sullins and Ms. Sedlacheck:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Monitoring Well Installation Drilling Job Delay," dated August 22, 2006. The "Monitoring Well Installation Drilling Job Delay," requests a 45-day extension for the Soil and Groundwater Investigation Report and Dual-Phase Extraction and Air Sparging Pilot Test Report. The request for extension is based on scheduling and supplier issues with the drilling contractor.

Based on your request, we are extending the schedule for the DPA and Air Sparging Pilot Test Report by 30 days and the schedule for the Soil and Groundwater Investigation Report by 45 days. The revised schedule is shown below in the Technical Report Request.

TECHNICAL REPORT REQUEST

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

- **October 31, 2006** – Soil and Groundwater Investigation Report
- **November 13, 2006** – DPE and Air Sparging Pilot Test Report
- **60 days after ACEH comments on DPE and Air Sparging Pilot Test Report** – Corrective Action Plan
- **February 15, 2007** – Semi Annual Monitoring Report for the Fourth Quarter 2006

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

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. 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.

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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

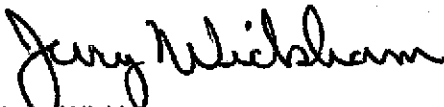
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Colleen Winey, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway
Livermore, CA 94551

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street,
Pleasanton, CA 94566

Chris Davidson, City of Livermore, Economic Development, 1052 S. Livermore Ave.,
Livermore, CA 94550

Sunil Ramdass, UST Cleanup Fund, 1001 I Street, 17th Floor, Sacramento, CA 95814-2828

Glenn Young, Fugro West, Inc., 1000 Broadway, Suite 200, Oakland, CA 94607

Raynold Kablonow, Geological Technics, Inc., 1101 7th Street, Modesto, CA 95354

Christa Marting, ETIC Engineering, Inc., 2285 Morello Avenue, Pleasant Hill, CA 94523

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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07-28-06

ENVIRONMENTAL HEALTH SERVICES
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July 27, 2006

Rita Sullins
Don Sul, Inc.
187 North L Street
Livermore, CA 94550

Jennifer Sedlacheck
Exxon Mobil
4096 Piedmont, #194
Oakland, CA 94611

Subject: Fuel Leak Case No. RO0000394, Arrow Rentals, 187 North L Street, Livermore, CA –
Feasibility Study Work Plan Approval

Dear Ms. Sullins and Ms. Sedlacheck:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Feasibility Study Work Plan," dated June 28, 2006 and received by ACEH on July 3, 2006. The "Feasibility Study Work Plan," which was prepared on your behalf by Geological Techniques, Inc., proposes dual phase extraction and air sparging pilot tests. We generally concur with the proposed pilot tests provided that the technical comments below are addressed during the implementation of the DPE and air sparging pilot tests. Submittal of a revised Work Plan is not required.

We request that you address the technical comments, perform the proposed work, and send us the technical reports requested below. Submittal of the technical reports requested below is also required in order to comply with the City of Livermore's March 1, 2006 Notice and Demand for cleanup of the site under the Polanco Redevelopment Act. On July 26, 2006, ACEH and the City of Livermore Redevelopment Agency conferred on the proposed work and schedule for technical reports.

TECHNICAL COMMENTS

1. **Data Collection during DPE Tests.** During the DPE tests, we request that the following operating parameters are recorded on a regular basis: unit vacuum (in Hg), wellhead vacuum (in Hg), total vapor flow in standard cubic feet per minute, oxidizer influent and individual well hydrocarbon concentrations measured using a field organic vapor analyzer, and stinger depth. Newly installed monitoring wells MW-4 through MW-8 are to be used to monitor vacuum influence and groundwater levels, as appropriate, during the DPE tests. Please present the results of the data collection in the DPE and Air Sparging Pilot Test Report requested below.
2. **Soil Vapor Influent Samples.** In addition to the proposed laboratory analyses of soil vapor from EW-1 and system effluent, air samples of influent vapor are to be collected from each

extraction well and the system a minimum of two times during each of the proposed DPE tests. We also request that air samples be collected for laboratory analysis from well EW-1 at the beginning and end of the air sparging test in well EW-1 in addition to periodic vapor sampling by PID. The influent samples may be collected using 1-liter Tedlar bags and analyzed for BTEX using EPA Method 8021 and TPHg using EPA Method 8015 or BTEX and TPHg using EPA Method 8260. Please present the results in the DPE and Air Sparging Pilot Test Report requested below.

3. **Groundwater Monitoring.** Following shutdown of the system and recovery of water levels, groundwater samples are to be collected from wells EW-1, W-1s, W-A, W-1, W-Bs, MW-4, MW-5, MW-6, MW-7, and MW-8 and analyzed for TPHg using EPA Method 8015 and BTEX using EPA Method 8021 or BTEX and TPHg using EPA Method 8260 to evaluate conditions following extraction and provide a baseline to evaluate rebound of dissolved phase concentrations. Please present the results in the DPE and Air Sparging Pilot Test Report requested below.

TECHNICAL REPORT REQUEST

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

- **August 15, 2006** – Semi Annual Monitoring Report for the Second Quarter 2006
- **September 15, 2006** – Soil and Groundwater Investigation Report
- **October 13, 2006** – DPE and Air Sparging Pilot Test Report
- **60 days after ACEH comments on DPE and Air Sparging Pilot Test Report** – Corrective Action 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.

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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.

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.

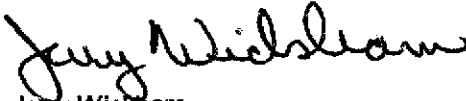
AGENCY OVERSIGHT

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.

Rita Sullins and Jennifer Sedlacheck
July 27, 2006
Page 4

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Matt Katen, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway
Livermore, CA 94551

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Chris Davidson, City of Livermore, Economic Development, 1052 S. Livermore Ave.,
Livermore, CA 94550

Abdul Karim Yusufzai, UST Cleanup Fund, P.O. Box 944212, Sacramento, CA 94244-2120

Glenn Young, Fugro West, Inc., 1000 Broadway, Suite 200, Oakland, CA 94607

Raynold Kablonow, Geological Technics, Inc., 1101 7th Street, Modesto, CA 95354

Christa Marting, ETIC Engineering, Inc., 2285 Morello Avenue, Pleasant Hill, CA 94523

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June 9, 2006

Rita Sullins
Don Sul, Inc.
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Jennifer Sedlacheck
Exxon Mobil
4096 Piedmont, #194
Oakland, CA 94611

Subject: Fuel Leak Case No. RO0000394, Arrow Rentals, 187 North L Street, Livermore, CA –
Work Plan Addendum Approval

Dear Ms. Sullins and Ms. Sedlacheck:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Work Plan Addendum: Additional Site Characterization," dated May 26, 2006 and received by ACEH on June 8, 2006. The "Work Plan Addendum: Additional Site Characterization," which was prepared on your behalf by Geological Techniques, Inc., proposes the advancement of five soil borings and installation, development, and sampling of five multi-channel wells screened at various depths in the aquifer. We generally concur with the proposed well installation provided that the technical comments below are addressed during the field investigation.

The Work Plan does not include a scope of work to conduct a pilot test for soil vapor extraction/air sparging, which was previously proposed in the document entitled, "Report of Findings," dated March 23, 2006. Based on the estimated mass of fuel hydrocarbons in the source area and the persistent elevated concentrations of fuel hydrocarbons in groundwater, remediation is necessary in the source area. A Work Plan to conduct interim remediation or a pilot test in the source area is to be submitted by July 9, 2006.

We request that you address the technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1. **Well MW-4.** The proposed location and methods for installation of well MW-4 are acceptable. Perforated intervals of the multi-channel well are to be installed within coarse-grained water-bearing zones that are identified by continuous coring. Please present the results of the well installation and sampling in the Soil and Groundwater Investigation Report requested below.

2. **Soil Sampling in Wells MW-5, MW-6, MW-7, and MW-8.** The Work Plan Addendum currently proposes soil sampling at 5-foot intervals with continuous coring as necessary if significant contamination is encountered. We request that all borings be continuously cored below the water table in order to avoid penetrating a clay aquitard and to select zones for setting the perforated intervals for the multi-channel wells. The proposal to submit soil samples for laboratory analysis at a minimum of 10-foot intervals from borings MW-5 through MW-8 is acceptable; however we request that soil samples be submitted for laboratory analyses for all depth intervals where staining, odor, or elevated PID readings are observed. If staining, odor, or elevated PID readings are observed over an interval of several to tens of feet, a sufficient number of soil samples should be submitted for laboratory analyses to characterize the fuel hydrocarbon concentrations within this interval. Please present the results of the soil sampling in the Soil and Groundwater Investigation Report requested below.
3. **Location of Well MW-5.** The proposed location of well MW-5 appears to be crossgradient or upgradient from the former release from the vapor monitoring well at the 1,000-gallon UST. In order to assess the concentrations of fuel hydrocarbons remaining in soil and groundwater in this area, please adjust the location of well MW-5 as necessary to locate the well near or downgradient from the location of the former release.
4. **Location of Well MW-6.** Boring B-H was the only boring in the area of the former dispensers that contained elevated concentrations of fuel hydrocarbons. The proposed location of well MW-6 appears to be crossgradient from boring B-H and the dispensers. Please adjust the location of well MW-6 as necessary to locate the well near or downgradient from boring B-H.
5. **Location of Well MW-7.** Well MW-7 is currently proposed near the southwestern corner of the former tank pit, which places the well upgradient from most of the former tank pit. Please move proposed well MW-7 to the north northwest, to a location near previous soil boring B-2 in order to locate the well in a location that is directly downgradient from a larger area of the former tank pit.
6. **Location of Well MW-8.** Well MW-8 is proposed adjacent to well W-3s, which is identified as the "historical down gradient direction." We do not agree that well W-3s is located in a downgradient direction from the source areas. Although historic water level data have suggested that the hydraulic gradient is to the west, we suspect these data and the apparent hydraulic gradient may not be accurate. The regional hydraulic gradient in this area is to the northwest as confirmed by data from monitoring wells at numerous sites in this area. Plume migration from the nearby B&C Gas Mini Mart site is also to the northwest. The concentration of fuel hydrocarbons detected in well W-Bs, which is northwest of the source areas, typically exceeds the concentration of fuel hydrocarbons detected in well W-3s by more than an order of magnitude. Therefore, we request that downgradient well MW-8 be installed northwest of well W-Bs rather than adjacent to well MW-3s.
7. **Well Box and Surface Casing Repair and Surveying.** We concur with the proposal to survey new and existing wells in accordance with Geotracker requirements. Surface casings and well boxes must be repaired in order to secure the wells and prevent downhole contamination. Please locate the existing wells that were not previously found during site

inspection and repair the well boxes and surface casings as needed. Please document the well repairs and surveying in the Soil and Groundwater Investigation Report requested below.

8. **Geotracker EDF Submittals** - A review of the case file and the State Water Resources Control Board's (SWRCB) Geotracker website indicate that electronic copies of analytical data have not been submitted for your site. Pursuant to CCR 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 LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, 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 accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload all analytical data (collected on or after September 1, 2001), to the SWRCB's Geotracker database website in accordance with the above-cited regulation.

TECHNICAL REPORT REQUEST

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

- **July 9, 2006** - Work Plan for Pilot Test or Interim Remediation
- **August 15, 2006** – Semi Annual Monitoring Report for the Second Quarter 2006
- **September 15, 2006** – Soil and Groundwater Investigation Report
- **60 days after ACEH approval of Soil and Groundwater Investigation Report** – Corrective Action 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.

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Rita Sullins and Jennifer Sedlacheck
June 9, 2006
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If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

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April 14, 2006

Rita Sullins
Don Sul, Inc.
187 North L Street
Livermore, CA 94550

Jennifer Sedlacheck
Exxon Mobil
4096 Piedmont, #194
Oakland, CA 94611

Subject: Fuel Leak Case No. RO0000394, Arrow Rentals, 187 North L Street, Livermore, CA

Dear Ms. Sullins and Ms. Sedlacheck:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Report of Findings," dated March 23, 2006 and received by ACEH on April 6, 2006. The "Report of Findings," which was prepared on your behalf by Geological Techniques, Inc., includes a recommendation to prepare a new work plan to supplement the December 8, 2005 "Work Plan for Additional Soil and Groundwater Investigation and Other Items." Several data gaps or potential data gaps, many of which were previously identified by ACEH, were not addressed in the December 8, 2005 work plan. Therefore, the preparation of a revised work plan that fully addresses the technical comments in ACEH's previous correspondence dated August 16, 2005 and December 27, 2005 (attached) is acceptable. The requested 45-day extension from May 5, 2006 is acceptable in order to prepare the revised Work Plan. Please submit the revised Work Plan **by June 20, 2006**.

We request that you address the technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1. **Site Conceptual Model.** We do not agree with the statement in the "Report of Findings," that a site conceptual model (SCM) cannot be prepared at this time, "due to the temporal and spatial variations in the historical groundwater and soil data points." Development of an SCM does NOT require that data do not have temporal or spatial variations nor does development of an SCM require a complete and accurate understanding of the site. In fact, is not useful to develop an SCM after site characterization is complete. The SCM process is an iterative process that involves reviewing existing data, developing working hypotheses, designing data collection to test the hypotheses, and refining the model. Site characterization is complete when the SCM is accurate and does not change as more data are collected. Development of an SCM is encouraged as a way to organize the site evaluation process, apply the scientific method, and convey thoughts and decisions to help others reach a similar conclusion but is not a requirement.

2. **Mass Balance.** A total of 31,910 kilograms of TPHg is estimated in soil based on an estimated contaminant extent of 12,422 square feet and average TPHg concentrations over 5-foot intervals to a total depth of 42.5 feet below ground surface (bgs). The highest mass of 20,672 kilograms is within the lowermost depth interval from 37.5 to 42.5 feet bgs. Please refine the mass balance estimates in future reports to include additional horizontal and vertical data, including depth intervals below 42.5 feet bgs.

TECHNICAL REPORT REQUEST

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

- **June 20, 2006** - Work Plan for Soil and Groundwater Investigation
- **120 days after ACEH approval of Work Plan** – Soil and Groundwater Investigation Report
- **August 15, 2006** – Semi Annual Monitoring Report for the Second Quarter 2006
- **60 days after ACEH approval of Soil and Groundwater Investigation Report** – Corrective Action 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.

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In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at jerry.wickham@acgov.org.

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

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UNDERGROUND STORAGE TANK CLEANUP FUND

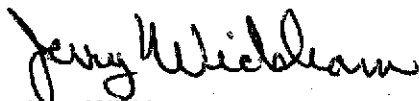
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

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If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Attachments: ACEH Correspondence Dated August 16, 2005 and December 27, 2005

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Matt Katen, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway
Livermore, CA 94551

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street,
Pleasanton, CA 94566

Chris Davidson, City of Livermore, Economic Development, 1052 S. Livermore Ave.,
Livermore, CA 94550

Abdul Karim Yusufzai, UST Cleanup Fund, P.O. Box 944212, Sacramento, CA 94244-2120

Glenn Young, Fugro West, Inc., 1000 Broadway, Suite 200, Oakland, CA 94607

Joe Angulo, Geological Technics, Inc., 1101 7th Street, Modesto, CA 95354

Christa Marting, ETIC Engineering, Inc., 2285 Morello Avenue, Pleasant Hill, CA 94523

Donna Drogos, ACEH
Jerry Wickham, 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

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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)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



sent 12-29-05

ENVIRONMENTAL HEALTH SERVICES

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

December 29, 2005

Rita Sullins
Don Sul, Inc.
187 North L Street
Livermore, CA 94550

Jennifer Sedlacheck
Exxon Mobil
4096 Piedmont, #194
Oakland, CA 94611

Subject: Fuel Leak Case No. RO0000394, Arrow Rentals, 187 North L Street, Livermore, CA –
Soil Gas Investigation Results

Dear Ms. Sullins and Ms. Sedlacheck:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Soil Gas Investigation Report, Arrow Rentals Property," dated December 2005 (received December 21, 2005) and prepared on behalf of the City of Livermore Redevelopment Agency by Fugro West, Inc. The stated purpose of the document is to evaluate whether gasoline compounds are present in soil gas beneath the property and, if detected, to evaluate whether soil vapor concentrations represent a risk to future residential site users. The report concludes that that the site can be used for the high-density residential buildings being considered for the site and recommends that copies of the report be provided to prospective developers.

We concur that the concentrations of fuel hydrocarbons detected in soil gas at the site do not pose a risk to human health due to indoor air vapor intrusion. Technical comments on the soil gas sampling are presented below. No further shallow soil or soil gas investigation or remediation is required to address potential indoor air vapor intrusion concerns at this site. We also concur that if redevelopment plans involve soil excavation from depths of more than 5 feet below ground surface that additional site characterization may be required and that special soil handling or off-site disposal may be required.

Further investigation of the site is proposed in the "Work Plan for Additional Soil and Groundwater Investigation and Other Items," dated December 8, 2005 and prepared on your behalf by Aquifer Sciences, Inc. This investigation is required to evaluate several previously identified data gaps related to deeper soil and groundwater contamination. The scope of work proposed in the December 8, 2005 Work Plan has been conditionally approved subject to addressing our technical comments on the Work Plan in ACEH correspondence dated December 27, 2005.

TECHNICAL COMMENTS

1. **Soil Gas Sampling Results.** Total Petroleum Hydrocarbons as gasoline (TPHg) were detected in each of the five soil gas samples collected at concentrations up to 600 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). As discussed in the report, these concentrations are well below the TPHg risk-based Environmental Screening Level (ESLs) for residential use of 26,000 $\mu\text{g}/\text{m}^3$ (San Francisco Regional Water Quality Control Board February 2005). The other volatile compounds analyzed, including benzene, toluene, ethylbenzene, and xylenes, were not detected in the soil gas samples. Based on these results, we concur that residual soil gas concentrations do not pose a risk to future residential site users via the indoor air inhalation pathway.
2. **Proposed Sampling Location SG-5.** Because the SUMA canister allocated for SG-5 was used to replace a compromised SUMA canister at SG-6, no soil gas sample was collected at proposed location SG-5. ACEH had requested that a soil gas sample be collected at proposed location SG-5 in order to assess soil gas concentrations in the area of a former valve box along the former product lines. Based on the low levels of volatile fuel hydrocarbons detected in soil gas from other areas of known fuel releases at the site, no further soil gas sampling in the area of proposed location SG-5 is required.

TECHNICAL REPORT REQUEST

No technical reports are requested for shallow soil or soil gas investigation or remediation. However, the following technical reports were identified in our December 27, 2005 correspondence to present the results of investigation of deeper soil and groundwater at the site. As previously requested in our December 27, 2005 correspondence, please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **May 5, 2006** – Soil and Groundwater Investigation Report
- **60 days after ACEH Approval of Soil and Groundwater Investigation Report** – Corrective Action Plan
- **August 15, 2006** – Semi Annual Monitoring Report for the Second Quarter 2006

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.

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Rita Sullins
Jennifer Sedlacheck
December 29, 2005
Page 3

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In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at jerry.wickham@acgov.org.

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PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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UNDERGROUND STORAGE TANK CLEANUP FUND

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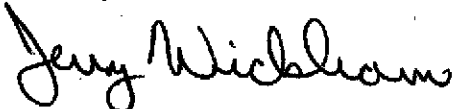
Rita Sullins
Jennifer Sedlacheck
December 29, 2005
Page 4

AGENCY OVERSIGHT

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If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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Livermore, CA 94551

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street,
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Chris Davidson, City of Livermore, Economic Development, 1052 S. Livermore Ave.,
Livermore, CA 94550

Abdul Karim Yusufzai, UST Cleanup Fund, P.O. Box 944212, Sacramento, CA 94244-2120

Rebecca Sterbentz, Aquifer Sciences, Inc., 3680-A Mt. Diablo Boulevard,
Lafayette, CA 94549

Glenn Young, Fugro West, Inc., 1000 Broadway, Suite 200, Oakland, CA 94607

Christa Marting, ETIC Engineering, Inc., 2285 Morello Avenue, Pleasant Hill, CA 94523

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT
12-28-05

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

December 27, 2005

Rita Sullins
Don Sul, Inc.
187 North L Street
Livermore, CA 94550

Jennifer Sedlacheck
Exxon Mobil
4096 Piedmont, #194
Oakland, CA 94611

Subject: Fuel Leak Case No. RO0000394, Arrow Rentals, 187 North L Street, Livermore, CA

Dear Ms. Sullins and Ms. Sedlacheck:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Response to August 16, 2005 ACEH Letter and Work Plan for Additional Soil and Groundwater Investigation and Other Items," dated December 8, 2005 and prepared on your behalf Aquifer Sciences, Inc. The stated main objective of the document is to address technical comments presented by ACEH in correspondence dated August 16, 2005. The Work Plan proposes to install four soil borings to assess the vertical extent of contamination. In the August 16, 2005 correspondence, ACEH identified several data gaps that had not been addressed during previous investigations for the site. ACEH also requested information on several items that potentially could represent data gaps. ACEH requested that these items be addressed during preparation of the Work Plan and the results presented in the Work Plan in order to plan site investigation accordingly. Similarly, the development of a Site Conceptual Model (SCM) was requested as part of the Work Plan since one of the primary purposes of the SCM is to identify data gaps that a Work Plan will address. However, the Work Plan indicates that several of ACEH's technical comments will be addressed following implementation of the field investigation and that an SCM will not be developed until field work is complete.

Please be aware that since several potential data gaps have not been evaluated prior to Work Plan preparation, additional investigation may be necessary based on the responses to the August 16, 2005 technical comments or data gaps identified in an SCM. However, in order to move the investigation forward, you may implement the proposed borings provided that the technical comments below are addressed. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Analytical Data for Soil Vapor.** ACEH has reviewed the results of soil vapor sampling conducted at the site by Fugro West. ACEH comments on the soil vapor sampling will be presented in separate correspondence.

2. **Soil Sampling.** The Work Plan proposes to advance four soil borings in the source area and presumed downgradient direction. Collection of soil samples for laboratory analysis is proposed at five-foot intervals from approximately 50 to 75 feet below ground surface (bgs) but the methods for sampling and logging are not identified. We request that soil samples be screened in the field to select samples for chemical analyses. Soil samples are to be submitted for analyses for all depth intervals where staining, odor, or elevated PID readings are observed. If staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number of soil samples from this interval should be submitted for laboratory analyses to characterize the fuel hydrocarbon concentrations within this interval. If no staining, odor, or elevated PID readings are observed in a boring, soil samples may be collected for laboratory analysis at fixed intervals of 10 feet. Please include results in the Soil and Groundwater Investigation Report requested below.
3. **Depth of Regional Aquitard.** The Work Plan does not incorporate information on the hydrogeology of adjacent sites to help plan the investigation. Prior to drilling the proposed soil borings, please review data from adjacent sites to estimate the depth to a regional clay aquitard. We request that the proposed borings be sampled and logged continuously down to the top of the aquitard to verify that the aquitard is present at your site.
4. **Grab Groundwater Sampling.** The Work Plan indicates that grab groundwater samples will be collected from the borings but does not indicate the number, depth, sampling method, or criteria to be used in selecting the intervals for grab groundwater sampling. In order to identify the depth intervals for grab groundwater sampling, the coarse-grained layers that are potential water-bearing units must be identified prior to grab groundwater sampling. Coarse-grained layers may be identified by continuous soil sampling for logging purposes or by cone penetrometer. Grab groundwater samples are to be collected from all coarse-grained layers that are potential migration pathways down to the top of the regional clay aquitard or a depth of 75 feet bgs if no regional aquitard is encountered. Grab groundwater samples are to be collected within the interval of the long screen wells in order to evaluate vertical plume distribution. The depth-discrete groundwater samples are to be collected in a boring(s) adjacent to the soil boring that was continuously logged using techniques that will prevent cross-contamination of separate water-bearing zones and contamination of the depth-discrete groundwater samples by groundwater from a shallower interval. Please include these results in the Soil and Groundwater Investigation Report requested below.
5. **Vertical Hydraulic Gradients.** Please include the assessment of vertical hydraulic gradient in the Soil and Groundwater Investigation Report requested below.
6. **Well Survey Results.** Please include the requested information regarding a well at 1962 Railroad Avenue and the updated well survey results in the Soil and Groundwater Investigation Report requested below.
7. **Cross Sections.** In future reports and work plans, please include analytical data from soil samples and groundwater samples for each of the borings and wells shown on the cross sections. The cross sections are to illustrate the lateral and vertical extent of soil layers, where groundwater was first encountered in borings and the static water levels,

observations of free product, staining, and odor, and sample locations and results. In addition, please show the screen intervals and filter packs for all wells on cross sections.

8. **Vapor Well.** Since this information was not provided in the Work Plan, please provide details on the construction of the vapor well associated with the 1985 fuel release. Show the depth and construction details for the vapor well on cross sections for the site. This information is to be included in the Soil and Groundwater Investigation Report requested below.
9. **Long Screen Wells.** Based on the data collected during the proposed field investigation, please include an assessment of whether the long screen wells at the site connect two water-bearing zones and whether groundwater sampling of the wells is providing accurate water quality data. Please include these results in the Soil and Groundwater Investigation Report requested below.
10. **Groundwater Sampling and Analyses.** No groundwater monitoring was apparently conducted at this site in 2005. We request that groundwater samples be collected from existing monitoring wells prior to or following the collection of grab groundwater samples from the proposed borings. Semi-annual groundwater monitoring is to be implemented following the proposed field investigation.

TECHNICAL REPORT REQUEST

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

- **May 5, 2006** – Soil and Groundwater Investigation Report
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Rita Sullins
Jennifer Sedlacheck
December 27, 2005
Page 4

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Rita Sullins
Jennifer Sedlacheck
December 27, 2005
Page 5

AGENCY OVERSIGHT

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Sincerely,



Jerry Wickham
Hazardous Materials Specialist

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Christa Marting, ETIC Engineering, Inc., 2285 Morello Avenue, Pleasant Hill, CA 94523

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SWT
11-425

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

November 3, 2005

Rita Sullins
Don Sul, Inc.
187 North L Street
Livermore, CA 94550

Jennifer Sedlacheck
Exxon Mobil
4096 Piedmont, #194
Oakland, CA 94611

Subject: Fuel Leak Case No. RO0000394, Arrow Rentals, 187 North L Street, Livermore, CA –
Work Plan Approval

Dear Ms. Sullins and Ms. Sedlacheck:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the work plan entitled, "Soil-Gas Work Plan," dated November 1, 2005 and received by ACEH on November 3, 2005. The work plan was prepared by Fugro West, Inc. on behalf of the City of Livermore Redevelopment Agency and Arrow Rentals to assist with redevelopment plans for the site. The work plan addresses one technical comment in ACEH's August 15, 2005 correspondence regarding soil vapor sampling at the site. Soil vapor sampling was also discussed during an October 17, 2005 meeting between Tony Sullins and Rita Sullins of Arrow Rentals, Chris Davidson and Leah Goldberg of the City of Livermore, Glenn Young of Fugro, Rebecca Sterbentz of Aquifer Sciences, and Ariu Levi, Donna Drogos, and Jerry Wickham of ACEH.

The work plan addresses soil vapor sampling but not the remaining technical comments in ACEH's August 15, 2005 correspondence. As discussed during the October 15, 2005 meeting, the remaining technical comments are to be addressed in a subsequent Work Plan, which is to be submitted by December 9, 2005.

This work plan was received by electronic mail on November 3, 2005. For future submittals, please comply with ACEH requests for electronic submittal of reports, which are described below. Please also note the requirement for a perjury statement from the responsible party. No cover letter from a responsible party was received with this document.

ACEH concurs with the proposed scope of work provided that two soil vapor sampling locations are added as discussed in the technical comments below. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below. Please provide 72-hour advance written notification to this office (e-mail preferred to jerry.wickham@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Proposed Soil Vapor Sampling Locations.** The four proposed soil vapor sampling appear to be in appropriate locations. Please include two additional soil vapor sampling locations to investigate the former pipeline trench to the dispensers. One soil vapor sample is to be collected near the former location of boring B-G and one sample is to be collected near the former valve box. The former valve box in the pipeline trench appeared to be located approximately 5 feet south and 8 feet east of the southeastern corner of the Arrow Rentals building.
2. **Proposed Sampling Methods.** The proposed sampling methods and quality control, which follow Department of Toxic Substances Control and Los Angeles Regional Water Quality Control Boards guidance, are acceptable.
3. **Geotracker EDF Submittals** - A review of the case file and the State Water Resources Control Board's (SWRCB) Geotracker website indicate that electronic copies of analytical data have not been submitted for your site. Pursuant to CCR 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 LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, 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 accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload all analytical data (collected on or after September 1, 2001), to the SWRCB's Geotracker database website in accordance with the above-cited regulation. Please perform the electronic submittals for applicable data and submit verification to this Agency by **December 9, 2005**.

TECHNICAL REPORT REQUEST

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

- **December 9, 2005** - Work Plan for Soil and Water Investigation
- **120 days after ACEH approval of Work Plan** – Soil and Groundwater Investigation Report
- **August 15, 2006** – Semi Annual Monitoring Report for the Second Quarter 2006
- **60 days after ACEH approval of Soil and Groundwater Investigation Report** – Corrective Action 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.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy 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 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, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic reporting](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.

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

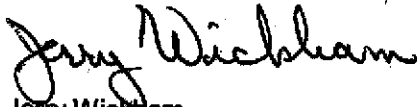
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Colleen Winey, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway
Livermore, CA 94551

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street,
Pleasanton, CA 94566

Chris Davidson, City of Livermore, Economic Development, 1052 S. Livermore Ave.,
Livermore, CA 94550

Abdul Karim Yusufzai, UST Cleanup Fund, P.O. Box 944212, Sacramento, CA 94244-2120

Glenn Young, Fugro West, Inc., 1000 Broadway, Suite 200, Oakland, CA 94607

Rebecca Sterbentz, Aquifer Sciences, Inc., 3680-A Mt. Diablo Boulevard,
Lafayette, CA 94549

Christa Marting, ETIC Engineering, Inc., 2285 Morello Avenue, Pleasant Hill, CA 94523

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



out
8-17-05

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

August 16, 2005

Rita Sullins
Don Sul, Inc.
187 North L Street
Livermore, CA 94550

Jennifer Sedlacek
Exxon Mobil
4096 Piedmont, #194
Oakland, CA 94611

Subject: Fuel Leak Case No. RO0000394, Arrow Rentals, 187 North L Street, Livermore, CA

Dear Ms. Sullins and Ms. Sedlacek:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the Request for Case Closure, dated August 8, 2005, prepared on your behalf by Aquifer Sciences, Inc. This site is located within the Livermore Basin where groundwater is extracted for drinking water use. ACEH is concerned with the persistent elevated concentrations of petroleum hydrocarbons and constituents in groundwater. Fuel discharges at the site apparently occurred prior to 1986; however, contaminant concentrations remain elevated. During the most recent April 2004 groundwater monitoring event, benzene was detected in well MW-1s at a concentration of 3,700 micrograms per liter ($\mu\text{g/L}$), which significantly exceeds the California Primary Maximum Contaminant Level (MCL) of 1 $\mu\text{g/L}$. The vertical extent of contamination has not been fully defined and no analyses have apparently been conducted for lead scavengers in groundwater. Based on these factors and the items discussed in the technical comments below, this fuel leak case cannot be closed at this time.

This decision is subject to appeal to the State Water Resources Control Board (SWRCB), pursuant to Section 25299.39(b) of the Health and Safety Code (Thompson-Richter Underground Storage Tank Reform Act - Senate Bill 562). Please contact the SWRCB Underground Storage Tank Program at (916) 341-5851 for information regarding the appeal process

We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1. **Table 1 - Analytical Data for Soil.** Table 1 was a useful compilation of all analytical results for soil. ACEH appreciates the presentation of analytical data in a comprehensive tabular format that allows the reader to evaluate site data.
2. **Section 3.2 - Analytical Data for Soil Vapor.** ACEH has reviewed the Woodward Clyde 1991 report and the Gribi Associates 1998 report on soil vapor sampling at the site. In

future documents for the site, please present the soil vapor sampling locations on a map that includes soil sampling locations and other site features such as the locations of former tanks and dispensers to allow a comparison of the soil vapor sampling locations to impacted area. The soil vapor sampling locations do not appear to be directly within the areas of fuel discharges to soil. Therefore, the soil vapor concentrations may not represent the highest soil vapor concentrations that will be encountered at the site.

3. **Section 5.2 – Vertical Extent of Soil and Groundwater Contamination.** The vertical extent of soil and groundwater contamination has not been fully defined for the site. The report indicates that contamination extends to less than 60 feet below ground surface (bgs). However, no soil or groundwater samples have been collected below 60 feet to confirm this. The soil boring for well MW-1 extended to a depth of 56.5 feet bgs (Woodward Clyde Consultants, 1989). Total petroleum hydrocarbons (TPH) as gasoline were detected at a concentration of 120 milligrams per kilogram in the lowermost soil sample collected at a depth of approximately 55 to 56.5 feet bgs. However, an organic vapor analyzer reading of greater than 1,000 ppm and a gasoline odor was observed in this lowermost soil sample. Based on these observations, soil contamination extends more than 56.5 feet bgs at this location. No groundwater samples have been collected at depths greater than 55 feet bgs to evaluate the vertical extent of groundwater contamination. Groundwater levels in the Livermore Basin were significantly lower than present water levels prior to 1990. Given the age of fuel releases at the site and historic depths to groundwater, petroleum hydrocarbons may have migrated a significant distance below the present water table and may be a long-term source of groundwater contamination. Soil sampling and depth-discrete groundwater sampling is to be conducted to depths greater than 60 feet bgs to define the vertical extent of contamination. Please present plans to fully define the extent of soil and groundwater contamination in the Work Plan requested below.
4. **Section 5.2 – Vertical Hydraulic Gradients.** The vertical hydraulic gradient for the site must be considered. Please include plans in the Work Plan requested below to measure vertical hydraulic gradients and to evaluate the potential for contaminants to migrate vertically.
5. **Section 6.1 – Well Survey Results.** California Well Service Well #8 is located approximately 1,850 feet west northwest of the site and is apparently the closest municipal well to the site. Well #8 does not appear to be discussed in the text or tables for the site. Well 3S/2E8R15 is discussed in the text but is not included on Table 4. The Phase I Site Environmental Assessment (Woodward Clyde Consultants 1989) discussed a domestic well located at 1962 Railroad Avenue. Please discuss the status of this domestic well and the potential for the well to be a vertical conduit for groundwater contamination from the site. Please revise the well survey to include the items discussed above and show the results of the well survey on a map or aerial photograph of the site. The revised well survey is to be included in the Work Plan requested below.
6. **Appendix A - Cross Sections.** Please show the depths of well screens and filter packs for the monitoring wells shown on cross sections.
7. **Lead Scavengers.** Ethylene dibromide (EDB) and 1,2-dichloroethane (1,2-DCA) were added to leaded gasoline prior to about 1988. These compounds are persistent in groundwater and have low MCL. Based on the age of the fuel releases at the site, lead

scavengers are likely contaminants. However, limited analyses appear to have been performed for lead scavengers in soil and no analyses appear to have been conducted for lead scavengers in groundwater. ACEH requests that the extent of lead scavengers in groundwater be defined for the site. Please present plans to define the lateral and vertical extent of lead scavengers at the site in the Work Plan requested below.

8. **Vapor Well.** Please provide details on the construction of the vapor well associated with the 1985 fuel release. Show the depth and construction details for the vapor well on cross sections for the site. This information is to be included in the Work Plan requested below.
9. **Long Screen Wells.** Several wells at the site have filter packs that are more than 25 feet in length. Please describe the current status of long-screen wells previously installed at the site. For all long-screen wells that have not been properly abandoned, please evaluate the potential for these wells to vertically connect two different water-bearing zones. These results are to be included in the Work Plan requested below.
10. **Site Conceptual Model.** The development of a Site Conceptual Model (SCM) for this site is encouraged in order to provide a framework for understanding the site conditions affecting the fate and transport of contaminants in the subsurface. A SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely magnitude of potential impacts to receptors. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. At this point, the SCM is said to be "validated." The validated SCM then forms the foundation for developing the most cost-effective corrective action plan to protect existing and potential receptors.

When performed properly, the process of developing, refining and ultimately validating the SCM effectively guides the scope of the entire site investigation. We have identified, based on our review of existing data, some key data gaps in this letter and have described several tasks that we believe will provide important new data to refine the SCM. We request that your consultant develop a SCM for this site, identify data gaps, and propose specific supplemental tasks for future investigations. There may need to be additional phases of investigations, each building on the results of the prior work, to validate the SCM. Characterizing the site in this way will improve the efficiency of the work and limit its overall cost.

The SCM approach is endorsed by both industry and the regulatory community. Technical guidance for developing SCMs is presented in API's Publication No. 4699 and EPA's Publication No. EPA 510-B-97-001 both referenced above; and "Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Appendix C," prepared by the State Water Resources Control Board, dated March 27, 2000.

The SCM for this project shall incorporate, but not be limited to, the following:

- a) A concise narrative discussion of the regional geologic and hydrogeologic setting obtained from your background study. Include a list of technical references you reviewed,

and copies (photocopies are sufficient) of regional geologic maps, groundwater contours, cross-sections, etc.

b) A concise discussion of the on-site and off-site geology, hydrogeology, release history, source zone, plume development and migration, attenuation mechanisms, preferential pathways, and potential threat to downgradient and above-ground receptors. Be sure to include the vapor pathway in your analysis. Maximize the use of large-scale graphics (e.g., maps, cross-sections, contour maps, etc.) and conceptual diagrams to illustrate key points. Include structural contour maps (top of unit) and isopach maps to describe the geology at your site.

c) Identification and listing of specific data gaps that require further investigation during subsequent phases of work.

d) Proposed activities to investigate and fill data gaps identified above.

e) The SCM shall include an analysis of the hydraulic flow system at and downgradient from the site. Include rose diagrams for groundwater gradients. The rose diagram shall be plotted on groundwater contour maps and updated in all future reports submitted for your site. Include an analysis of vertical hydraulic gradients. Note that these likely change due to seasonal precipitation and pumping.

f) Temporal changes in the plume location and concentrations are also a key element of the SCM. In addition to providing a measure of the magnitude of the problem, these data are often useful to confirm details of the flow system inferred from the hydraulic head measurements. Include plots of the contaminant plumes on your maps, cross-sections, and diagrams.

g) Other contaminant release sites exist in the vicinity of your site. Hydrogeologic and contaminant data from those sites may prove helpful in testing certain hypotheses for your SCM. Include a summary of work and technical findings from nearby release sites and incorporate the findings from nearby site investigations into your SCM.

Report the information discussed above in your initial SCM and include it in the Work Plan requested below. Include updates to your SCM in the Soil and Groundwater Investigation Report requested below.

11. **Corrective Action Plan.** The purpose of the CAP is to use the information obtained during investigation activities to propose cost-effective final cleanup objectives for the entire contaminant plume and remedial alternatives for soil and groundwater that will adequately protect human health and safety, the environment, eliminate nuisance conditions, and protect water resources.

Please submit a Corrective Action Plan (CAP) for the final cleanup of contamination in soil and groundwater at your site by the date specified below. The CAP should be based on the results of the on-site and off-site subsurface investigation and interim remediation. The CAP must address at least three technically and economically feasible methods to restore and protect beneficial uses of groundwater and to meet the cleanup objective for each

contaminant established in the CAP. The CAP must propose verification monitoring to confirm completion of corrective actions and evaluate CAP implementation effectiveness.

12. **Geotracker EDF Submittals** - A review of the case file and the State Water Resources Control Board's (SWRCB) Geotracker website indicate that electronic copies of analytical data have not been submitted for your site. Pursuant to CCR 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 LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, 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 accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload all analytical data (collected on or after September 1, 2001), to the SWRCB's Geotracker database website in accordance with the above-cited regulation. Please perform the electronic submittals for applicable data and submit verification to this Agency by **October 3, 2005**.

TECHNICAL REPORT REQUEST

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

- **October 25, 2005** - Work Plan for Soil and Water Investigation
- **120 days after ACEH approval of Work Plan** – Soil and Groundwater Investigation Report
- **August 15, 2006** – Semi Annual Monitoring Report for the Second Quarter 2006
- **60 days after ACEH approval of Soil and Groundwater Investigation Report** – Corrective Action 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.

ELECTRONIC SUBMITTAL OF REPORTS

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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 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, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board 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.

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.

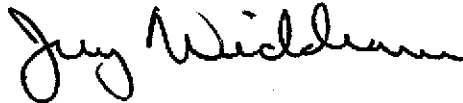
AGENCY OVERSIGHT

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.

Rita Sullins and Jennifer Sedlacheck
August 16, 2005
Page 7

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Colleen Winey, QIC 80201
Zone 7 Water Agency
100 North Canyons Parkway
Livermore, CA 94551

Danielle Stefani
Livermore-Pleasanton Fire Department
3560 Nevada Street
Pleasanton, CA 94566

Abdul Karim Yusufzai
UST Cleanup Fund
P.O. Box 944212
Sacramento, CA 94244-2120

Thomas Neely
Aquifer Sciences, Inc.
3680-A Mt. Diablo Boulevard
Lafayette, CA 94549

Donna Drogos, ACEH
Jerry Wickham, ACEH

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)
Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. This e-government initiative is aimed at making our programs more effective and efficient. The electronic copy is intended to replace the need for a paper copy and is expected to be relied upon for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- Entire report including cover letter must be submitted as a **single portable document format (PDF) with no password protection**. (If you cannot submit in PDF format, please check with us to see if we can accommodate your report format).
- 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 **should** be included and **must** have either original or electronic signature. Alternatively, the paper copy of the signature page and perjury statement can be mailed separately.
- **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**. If you cannot comply with this you may continue to submit paper documents.
- 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:
 - Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - a) Send an e-mail to dehloptoxic@acgov.org
 - or
 - b) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
 - 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**.
 - Note: Both the User Name and Password are Case Sensitive.
2. Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+) or equivalent browser, go to <ftp://alcoftp1.acgov.org>
 - 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)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
5-4-05

May 2, 2005

Rita Sullins
Arrow Rentals
187 North L St.
Livermore, CA 94550

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

Dear Ms. Sullins:

Subject: Fuel Leak Case No. RO0000394, Arrow Rentals, 187 North L St., Livermore, CA
– Response to Request for Case Closure

Alameda County Environmental Health (ACEH) has reviewed your April 26, 2005, *Request for Case Closure* prepared by Aquifer Sciences, Inc., for the above-referenced site. Aquifer Sciences requests review of the site for closure. Prior to your case being considered for closure, please be advised that the following State Water Board "low risk" criteria must be met. Please review all reports for the site. If you feel that your site meets the following state requirements for a "low risk" site, then submit a stand-alone document specified below for our office review. Please note that your April 26, 2005, request did not include the supporting documentation described below. This documentation will facilitate our review of your case; however, please be advised that submittal of all documentation specified in this letter does not guarantee that ACEH will concur that the site meets the following "low risk" criteria.

LOW RISK requirements:

1. Leak stopped, on-going source, including free product removed
2. Site adequately characterized
3. Plume not migrating
4. No sensitive receptors impacted
5. No significant risk to human health
6. No significant risk to environment
7. Water quality objectives to be achieved within a reasonable time frame

Please be advised that a stand-alone document must include a site conceptual model (SCM), which incorporates the following items:

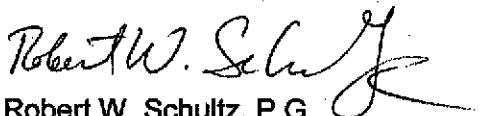
- Summary Figures
 - Site vicinity map showing the site location and identification of any nearby sensitive receptors.
 - Plot plan showing all historical sampling locations. Differentiation between sample types (i.e. excavation soil samples, soil boring locations, soil vapor sampling points, monitoring wells, etc.) is required. This figure also needs to include any former and existing UST system components, delineation of excavation areas, areas targeted by

active remediation, building locations, potential preferential pathways such as utilities, property boundaries and public right-of-way locations.

- Depth-specific contaminant isoconcentration maps for soil and groundwater. If active remediation was performed, separate pre-remediation and post-remediation isoconcentration maps are required.
- Summary Tables
 - Table of all historical soil data. Sample ID, date, depth, results for all analytes and detection limits for all "non-detect" results are required. Please refer to the Tri-Regional Guidelines to confirm that chemical analysis was performed for all relevant contaminants of concern (CoCs). Pre- and post-remediation concentrations should be clearly identified or presented in separate tables.
 - Table of all historical groundwater data. Sample ID, date, depth to water, groundwater elevation, screening interval, results for all analytes, detection limits for all "non-detect" results. Pre- and post-remediation concentrations should be clearly identified or presented in separate tables.
 - The tables need to compare the detected CoC concentrations with the Regional Board's Environmental Screening Levels (ESLs) or other appropriate cleanup levels and to the water quality objectives identified in the Regional Board's Basin Plan.
- Complete set of all boring logs generated during site investigation.
- Geologic cross-sections showing soil borings, monitoring wells with screened intervals, UST locations, any preferential pathways, excavation boundaries, water table elevations (historical and current) and extent of residual contamination.

The above stand-alone document will help to expedite the review of your case. Additional guidance for preparation of case closure packages can be found in the recent version of the Tri-Regional Guidelines, prepared by the RWQCB-CVR, *Appendix A – Reports Tri - Regional Board Staff Recommendations For Preliminary Investigation And Evaluation Of Underground Tank Sites* dated April 16, 2004. This document can be obtained via the internet at: <http://www.waterboards.ca.gov/centralvalley/>. ACEH considers guidance from Federal and State agencies, including the RWQCB-SFBR, the DTSC and the RWQCB-CVR, in determining appropriate corrective action needs for fuel or hazardous materials release sites in Alameda County. Please contact me at 510-567-6719 or robert.schultz@acgov.org to receive document samples to help you prepare the stand-alone document, if you are requesting a closure review.

Sincerely,



Robert W. Schultz, P.G.
Hazardous Materials Specialist

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



06-11-02

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

RO0000394

June 10, 2002

Mrs. Rita Sullins
Arrow Rentals
187 North L Street
Livermore, CA 94550

RE: Semi-Annual Monitoring at 187 North L Street, Livermore, CA

Dear Mrs. Sullins:

I have completed review of Aquifer Sciences, Inc's May 2002 *Semi-Annual Groundwater Monitoring Event 2002* report prepared for the above referenced site. Monthly monitoring (Feb to April 2002) of well W-1s did not reveal the presence of free product (as was noted in November 2001). Groundwater from wells W-1s and W-Bs continues to contain elevated levels of TPHg and benzene constituents.

Groundwater elevation in the Livermore Basin has varied greatly, depending on the amount of water recharge to the aquifer. The change in groundwater elevation often correlates to great changes in contaminant concentrations detected in monitoring wells. Groundwater in the Livermore Basin is also a source of potable water. For these reasons, groundwater monitoring/sampling should continue on a semi-annual basis, and not on an annual basis as recommended by Aquifer Sciences. Groundwater from wells W-1, W-B and W-3 should be sampled in the 1st and 3rd quarters of each year until further notice. In addition, well W-E should be sampled annually, in the 1st quarter of each year.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

email: Tom Neely
Rebecca Sterbentz

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Sent 1/11/00
Including cc's

20394

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700
(510) 337-9432

StID 4132

January 10, 2000

Mrs. Rita Sullins
Arrow Rentals
187 North L Street
Livermore, CA 94550

RE: PNAs Analysis for 187 North L Street, Livermore, CA

Dear Mrs. Sullins:

I have completed review of Aquifer Sciences, Inc's November 1999 *Semi-Annual Groundwater Monitoring* report prepared for the above referenced site. Groundwater analytical results identified PNAs compounds (510ppb naphthalene and 280ppb 2-Methyl-naphthalene) in Well W-1s. For the next sampling event, please also analyze groundwater from Well W-3s and W-Bs for PNAs. When it is determined that the PNAs plume is localized and residual concentrations do not pose a risk to human health or the environment, the analysis for PNAs may be discontinued.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: Thomas Neely, Aquifer Sciences, Inc., 3680-A Mt. Diablo Blvd.,
Lafayette, CA 94549

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R0# 394

StID 4132

April 26, 1999

Mrs. Rita Sullins
Arrow Rentals
187 North L Street
Livermore, CA 94550

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

RE: Workplan approval for 187 North L Street, Livermore, CA

Dear Mrs. Sullins:

I have completed review of Aquifer Sciences, Inc's April 1999 *Work Plan for Risk Assessment* prepared for the above referenced site. The proposal to conduct a well survey, evaluate hydrogeologic data, and perform a risk assessment utilizing site-specific and hydrogeologic data is acceptable. Because the contaminant plume has migrated offsite, both on-site and off-site scenarios should be evaluated in the risk assessment. Both current use scenario and future use scenario should be considered in the evaluation. Representative soil concentration should be obtained from soil data collected only from the vadose zone. And representative groundwater concentration should be data collected from the most recent four quarterly sampling events.

The risk assessment is due to this office within 60 days of the date of this letter. If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: Thomas Neely
Aquifer Sciences, Inc
3680-A Mt. Diablo Blvd
Lafayette, CA 94549

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0# 394

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

StID 4132

March 15, 1999

Mrs. Rita Sullins
Arrow Rentals
187 North L Street
Livermore, CA 94550

RE: Cleanup Levels for 187 North L Street, Livermore, CA

Dear Mrs. Sullins:

Thank you for the recent submittal of Aquifer Sciences, Inc's December 1998 *Semi-Annual Groundwater Monitoring* and Gribi Associates' November 1998 *Report of Soil Vapor Sampling* reports prepared for the above referenced site. I have completed review of these reports and it appears from the soil vapor study that hydrocarbon vapors in shallow soil does not pose a significant risk to human health for indoor or outdoor exposure routes. However, concentrations of gasoline constituents in groundwater continue to be elevated.

At this time, a risk analysis should be prepared for the site to determine site specific cleanup levels that will prevent the leaching of contaminants in soil to groundwater and the migration of contaminants into unaffected water. When site specific target levels are reached, the plume is not migrating, and the plume is naturally degrading, then the site can be evaluated for site closure. The risk assessment workplan is due to this office within 60 days of the date of this letter, or **by May 17, 1999.**

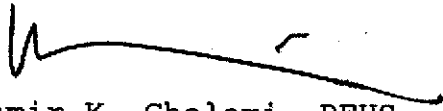
In the meantime, please adhere to the semi-annual sampling schedule for wells W-1s, W-3s and W-Bs, and the annual sampling of well W-Es. Groundwater should be analyzed for TPHg, TPHd, BTEX, and MTBE. Silica gel cleanup should be performed on water sample extracts prior to the use of Method 8015 analysis for TPHd. Lastly, the groundwater sample exhibiting the highest TPHd concentration should also be analyzed for PNAs.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

arrow11

Sincerely,



Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. & Ms. Anthony B. Varni & Marlene M. Varni, P.O. Box 570,
Hayward, CA 94543

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 394

ENVIRONMENTAL HEALTH SERVICES

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

StID 4132

August 14, 1998

Mrs. Rita Sullins
Arrow Rentals
187 North L Street
Livermore, CA 94550

RE: Workplan Approval for 187 North L Street, Livermore, CA

Dear Mrs. Sullins:

I have completed review of Gribi Associates' August 1998 "Workplan to Conduct Soil Vapor Sampling" at the above referenced site. The proposal to collect soil vapor samples, using summa canisters, at two locations at approximately three feet below surface grade is acceptable. Field work should commence within 45 days of the date of this letter.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: James Gribi
884 Vintage Ave
Fairfield, CA 94585

arrow10

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RW 394

StID 4132

June 19, 1998

Mrs. Rita Sullins
Arrow Rentals
187 North L Street
Livermore, CA 94550

ENVIRONMENTAL HEALTH SERVICES

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

RE: Risk Assessment and Monitoring Report for 187 North L Street, Livermore, CA

Dear Mrs. Sullins:

I have completed review of Environmental Sampling Services' June 1998 Semi-Annual, April 1998 Report for the above referenced site. This report documents the sampling of groundwater from monitoring wells W-1s, W-3s, and W-Bs.

The next sampling event should be in October 1998. For that sampling event, groundwater from monitoring well W-Bs should be analyzed to Polynuclear Aromatics (PNAs) and for MTBE using EPA Method 8260. Subsequent reports should include a historic table of groundwater analytical results and depth to groundwater.

In my October 8, 1997 letter to you, I requested that a risk assessment workplan be submitted to this office for review. The workplan was due by December 1997. To date I have not received the workplan. This is a second request for technical reports pursuant to Title 23, CCR, Section 2722(c). A workplan should be submitted by **July 30, 1998**. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this agency.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: Stephen Penman, ESS, 6680 Alhambra Ave, #102, Martinez, CA 94553

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RO#394

StID 4132

October 8, 1997

Mrs. Rita Sullins
Arrow Rentals
187 North L Street
Livermore, CA 94550

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

RE: Risk Assessment for 187 North L Street, Livermore, CA

Dear Mrs. Sullins:

I have completed review of Environmental Sampling Services' Quarter 1 Groundwater Sampling Event July 1997 report for the above referenced site. Groundwater from wells W-1s, W-3s, and W-Bs continue to exhibit elevated concentrations of TPH as gasoline and diesel, and BTEX.

At this time the sampling frequency of wells W-1s, W-3s, and W-Bs may be reduced from a quarterly to a semi-annual basis. These wells should be sampled in the 1st and 3rd quarter of each year. And well W-Es should be sampled annually, during the 3rd quarter of each year. Groundwater should be analyzed for TPHg, TPHd, BTEX, and MTBE. The next sampling event should also include the analysis for total lead in groundwater from well W-1s.

In addition, a risk analysis should be prepared to determine if residual soil and groundwater contamination poses a risk to human health. ASTM's Risk-Based Corrective Action Tier 2 process is one of many risk analyses available. A risk assessment proposal is due to this office within 60 days of the date of this letter, or by December 9, 1997.

If you have questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RO# 394

StID 4132

December 31, 1996

Mrs. Rita Sullins
Arrow Rental
187 North L Street
Livermore, CA 94550

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

RE: QMR at 187 North L Street, Livermore, CA

Dear Mrs. Sullins:

I have completed review of Woodward-Clyde's December 1996 Quarterly Monitoring report for the above referenced site. The results of the November 1996 sampling event compared with the March 1996 sampling event showed an increase in TPHg and BTEX concentrations in wells W-Es, W-1s and W-Bs. Also noted is that the depth to groundwater decreased ~8 to 10' since March 1996.

Your consultant recommended that future groundwater monitoring be performed on a semi-annual schedule. However, since there appears to be substantial seasonal groundwater fluctuation at the site, groundwater should be monitored/sampled over an entire year (four quarters) before a reduced sampling schedule can be considered. Therefore, quarterly sampling should continue until further notice.

The next sampling event should include the analysis for TPHd in wells W-1s, W-3s and W-Bs, in addition to TPHg, BTEX, and MTBE. Diesel was identified in wells W-1 and W-3 in May 1989. The quarterly report should also include historic groundwater data incorporated into one table to easily identify contaminant concentration trends and changes in depth to water. Your cooperation in this matter is greatly appreciated.

If you have any questions, I can be reached at (510) 567-6762.
Happy New Year!

eva chu
Hazardous Materials Specialist

c: Al Ridley, WCC, 500 12th St, Suite 100, Oakland, CA 94607

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

20394

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

StID 4132

September 11, 1996

Mrs. Rita Sullins
Arrow Rentals
187 North L Street
Livermore, CA 94550

RE: Workplan Approval for 187 North L Street, Livermore, CA

Dear Mrs. Sullins:

I have completed review of Woodward-Clyde's August 1996 Work Plan to Perform Quarterly Monitoring at the above referenced site. The proposal to initiate a round of groundwater sampling of wells W-Es, W-1s, W-Bs, and W-3s is acceptable. Based on the analytical results a reduced schedule for monitoring may be requested by your consultant. A report summarizing field activities should include, among others, gradient and iso-concentration maps, field data sheets, chain of custody forms, conclusions and recommendations.

If you have any questions, I can be reached at (510) 567-6762.

A handwritten signature in cursive script, appearing to read 'eva chu'.

eva chu
Hazardous Materials Specialist

c: Al Ridley, WCC, 500 12th Street, Suite 100, Oakland 94607
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



20394

ALAMEDA COUNTY CC4580
ENVIRONMENTAL HEALTH SERVICES
1131 HARBOR BAY PKWY., # 250
ALAMEDA, CA 94502-6577
(510) 567-6700 FAX (510)337-9335

StID 4132

July 26, 1996

Mrs. Rita Sullins
Arrow Rentals
187 North L Street
Livermore, CA 94550

RE: Quarterly Monitoring at 187 North L St, Livermore

Dear Mrs. Sullins:

I have completed review of Woodward Clyde's May 1996 Installation and Sampling of Replacement Monitoring Wells report for the above referenced site. The wells were installed and sampled in March 1996.

At this time, a quarterly monitoring schedule should be established for the replacement wells W-Es, W-1s, W-Bs, and W-3s. This schedule should be implemented immediately. Quarterly monitoring reports are due within 60 days upon completion of field work.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: Al Ridley, WCC, 500 12th St, #100, Oakland, CA 94607-4014
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 394

ARNOLD PERKINS, DIRECTOR
RAFAT A. SHAHID, DEPUTY DIRECTOR

StID 4132

January 19, 1996

Mrs. Rita Sullins
Arrow Rentals
187 North L Street
Livermore, CA 94550

ALAMEDA COUNTY
ENVIRONMENTAL HEALTH SERVICES
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577
(510)567-6700

RE: Construction of New Wells at 187 North L St, Livermore

Dear Mrs. Sullins:

Thank you for the submittal of Woodward Clyde's (WCC) December 1995 "Report of Remedial Activities Since January 1994" for the above referenced site. This report included laboratory analytical results of the groundwater sampling event performed in September 1995, and also included the results of the Dual Phase Pilot Test performed in March 1994.

Base on the pilot test performed, the estimated conductivity for this site was calculated at about 6×10^{-4} cm/sec, which is consistent with a sand aquifer material. A capture zone of at least 50' was observed. The effectiveness of soil vapor extraction could not be evaluated since groundwater level in the wells were all above the screened interval of the well casings.

WCC proposed the construction of four new groundwater wells with screened intervals to reflect current groundwater elevations. Cleanup levels will be determined using the ASTM Risk Based Corrective Action method following evaluation of laboratory analyses of groundwater samples from these new wells. If deemed necessary, another dual-phase extraction pilot test may be performed with the new wells.

This proposal is acceptable and field activities should commence within 45 days of the date of this letter, or by **March 6, 1996**. It is recommended that another new well also be installed in the vicinity of well W-E, which is near the outer edge of the contaminant plume. Please notify me at least 72 hours prior to the start of field work. If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

cc: Al Ridley, WCC, 500 12 St, Suite 100, Oakland 94607-4014
Cheryl Gordon, SWRCB Cleanup Fund
files (arrows)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0394

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 4132

June 29, 1995

Ms. Rita Sullins
Arrow Rentals
187 North L Street
Livermore, CA 94550

Alameda County Environmental Health Dept
Environmental Protection Division
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577
(510) 567-6700

(510) 271-4530

RE: 187 North L Street, Livermore 94550

Dear Ms. Sullins:

On February 2, 1994 I approved Woodward-Clyde's January 1994 Workplan for a Dual-Phase Extraction Pilot Test at the above referenced site. Vapor extraction could not be performed because groundwater elevation was above the screened interval of the wells, and groundwater extraction did not lower the water level. To date I have not received documentation of this work performed, nor have I received any reports of continued quarterly groundwater monitoring at this site. Please submit any reports of recent work performed since January 1994. If work has been discontinued, quarterly sampling of the onsite wells must be reinstated immediately.

Be advised that groundwater elevation has risen, with the recent rains, to a depth of 25 to 30 feet. Because water levels are approximately 20' above the screened intervals, replacements wells are now required.

At this time, pursuant to Section 2721 et seq. of Article 11, Title 23, California Code of Regulations, you are hereby requested to develop an alternative Corrective Action Plan (CAP) for further investigation of this site, and to identify and evaluate all feasible alternatives for cleanup of soil and groundwater, both on and offsite, caused by the unauthorized release of petroleum products, as dual phase extraction may not be feasible for this site. This plan should also include the installation of additional monitorings wells, screened from approximately 20- to 45-foot depth.

The referenced CAP is due in this office within 45 days of the date of this letter, or by August 18, 1995. If you have any questions, I can be reached at (510) 567-6762.

A handwritten signature in cursive script, appearing to read 'eva chu'.

eva chu
Hazardous Materials Specialist

Rita Sullins
re: 187 N. L St., Livermore
June 29, 1995

Page 2

cc: Cheryl Gordon, SWRCB Clean Up Fund
files

arrow4

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0394

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

StID 4132

February 2, 1994

Ms. Jo Beth Folger
Woodward-Clyde Consultants
500 12 St., Suite 100
Oakland, CA 94607-4014

**Subject: Workplan Approval for Pilot Test at Arrow Rentals,
187 North L St., Livermore, CA 94550**

Dear Ms. Folger:

I have completed review of Woodward-Clyde's January 1994 Workplan for a Dual Phase Extraction Pilot Test report for the above referenced site. The pilot test proposed is acceptable and field activities should commence **within 45 days of the date of this letter**. Please notify this office at least 72 hours prior to the start of field work.

If you have any questions, I can be reached at (510) 271-4530.

Sincerely,

eva chu
Hazardous Materials Specialist

cc: Rita Sullins, Arrow Rentals, 187 North L St., Livermore
94550
files

arrow3

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0394

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 4132

July 23, 1993

Mr. and Mrs. Tony Sullins
Arrow Rentals
187 North L Street
Livermore, CA 94550

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

Subject: CAP for Arrow Rentals, 187 North L St., Livermore 94550

Dear Mr. and Mrs. Sullins:

On November 9, 1992, this office requested a Corrective Action Plan (CAP) to further identify and evaluate all feasible alternatives for cleanup of soil and groundwater, both on- and off-site, caused by the unauthorized release of petroleum products at the above referenced site. To date we are not in receipt of the CAP.

In recent conversations, you stated you have begun to seek bids for using a dual vacuum extraction system to remediate the site. Upon selection of your consultant, please submit **within 60 days of the date of this letter** a signed contract, which should include a project time schedule of each phase of the remediation process, including the startup date of field activity. Also, send a copy of the signed contract to the State Water Resources Control Board, who will determine if you are in compliance with the Underground Tank Corrective Action Regulations and subsequent eligibility for underground storage tank cleanup funding.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

eva chu
Hazardous Materials Specialist

cc: Anna Cervin, SWRCB
files

arrow2

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



R0394

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 4132

DEPARTMENT OF ENVIRONMENTAL HEALTH

State Water Resources Control Board

Division of Clean Water Programs

UST Local Oversight Program

80 Swan Way, Rm 200

Oakland, CA 94621

(510) 271-4530

November 9, 1992

Tony and Rita Sullins
Arrow Rentals
187 North L Street
Livermore, CA 94550

**Subject: Corrective Action Plan for Arrow Rentals,
187 North L St., Livermore 94550**

Dear Mr. and Mrs. Sullins:

This office has reviewed the case file for the above referenced site. Field work performed to date appears to adequately delineate the extent of soil and ground water contamination at the site. The latest report, Soil and Groundwater Characterization Study, dated June 12, 1991 and prepared by Woodward-Clyde Consultants, show monitoring well W-1 to contain free floating fuel product. We are not in receipt of reports documenting any interim action taken to abate the potential effects of free product in groundwater.

Please be advised, pursuant to Section 2655 of Article 5, Title 23 of the California Code of Regulations (23 CCR), the owner or operator shall conduct free product removal in a manner that will minimize the spread of contamination into previously uncontaminated zones. Free product removal reports must be prepared in compliance with said section and be submitted within 45 days upon completion of interim remediation.

At this time, pursuant to requirements set forth under Article 11, 23 CCR, Section 2720 et seq., you are hereby requested to develop a Corrective Action Plan (CAP) for further investigation of this site, and to identify and evaluate all feasible alternatives for cleanup of soil and groundwater, both on- and off-site, caused by the unauthorized release of petroleum products.

The referenced CAP is due in this office within 45 days of the date of this letter. Include a time schedule for the completion of each aspect of the remediation process. Interim remedial action can occur concurrently with any phase of corrective action, that is, free product removal should begin as soon as possible. Field work for site cleanup shall commence within 60 days upon approval of the CAP.

In addition, 23 CCR, Section 2652(d), requires the owner or operator of an underground storage tank facility to submit reports every three months, or at a more frequent interval as specified by the local agency or Regional Water Quality Control

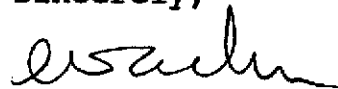
Tony and Rita Sullins
Arrow Rentals
November 9, 1992
Page 2 of 2

Board (RWQCB), until investigation and cleanup are complete. We are not in receipt of any reports documenting work performed after June 1990. At this time, you must reinstate a quarterly schedule of well sampling and monitoring. Technical summary reports documenting each well sampling and monitoring episode are also due quarterly. This schedule shall continue until further notice. Copies of all reports should also be sent to Mr. Eddy So of the RWQCB.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

If you have any questions or comments on the content of this letter, please contact me at (510) 271-4530.

Sincerely,



Eva Chu
Hazardous Materials Specialist

cc: Eddy So, RWQCB
Danielle Stefani, Livermore Fire Department
Gil Jensen, Alameda County District Attorney's Office
Peter MacDonald, 400 Main St., #210, Pleasanton 94566
Stan Roller, Mobil Oil, 3800 W. Alameda Ave., #700,
Burbank, CA 91505-4331
Edgar Howell/files

arrow



February 27, 1990

Mr. Peter McDonald
400 Main Street, Suite 210
Pleasanton, CA 94566

Site: Arrow Rentals, 187 N. "L" St., Livermore

Dear Mr. McDonald:

We have received the Analysis of Remediation Alternatives, Soil and Groundwater Contamination, December 22, 1990 as prepared by Woodward-Clyde Consultants. We have also received a Proposed Work Plan for the Characterization of Petroleum Contamination February 14, 1990 by Woodward Clyde Consultants. The first document outlines conceptual remedial options for cleaning up existing contamination of the groundwater. The second document outlines further characterization work on the site.

The site under consideration has one leaded underground gasoline tank (1000 gal) which is currently in operation. It also previously had 5 underground storage tanks: Three 1500 gallons tanks used for petroleum products were removed in 1972 and were found to be leaking either at the tanks or in the piping. A 4,000 gal and 6,000 gal tank, at the site for more than 40 years were removed in 1984. In July 1985, as indicated by your office, a delivery of 600 gallons of gasoline was inadvertently put into a vapor monitoring well next to the fill pipe of the existing 1000 gal gasoline tank. In addition, Woodward-Clyde and RWQCB reports have indicated fuel leaks from other sources in the area.

The proposed work plan is acceptable provided that a more accurate determination of the groundwater flow is made. The determination of the direction was made at only one time; 3 - 4 quarters should be measured before the precise location of the wells are determined.

The proposed remediation conceptual alternatives appear to be technically feasible. It should be noted, that remediation is normally considered after the characterization of the site is complete and that future results may affect the feasibility of any one alternative. In addition it is not recommended that remediation be commenced until the groundwater contamination is completely characterized. Approval of all groundwater contamination sites is subject to review and comment by the San Francisco Regional Quality Control Board and the California Department of Health

Services. A risk assessment report may be required by this office for any residual contamination in the groundwater after the conclusion of any remedial option.

If you have any questions on this matter, please call me at 271-4320.

Sincerely,

Lowell J. Miller
Senior Hazardous Materials Specialist

LM:lm

cc: Karen Majors
Redevelopment Coordinator
City of Livermore Redevelopment Agency
1052 S. Livermore Ave.
Livermore, CA 94550

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0394

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415) 271-4320

July 25, 1989

Mr. Toni Sullins
Arrow Rentals
187 North L Street
Livermore, CA 94550

SUBJECT: CONTAMINATION OF SOIL AT 187 NORTH L STREET, LIVERMORE,
CALIFORNIA 94550

Dear Mr. Sullins:

In a report prepared by Woodward Clyde Consultants dated July 10, 1989, it was indicated that TPH of 16,000 ppm was found at a boring near your former gasoline tanks. Title 23 of the California Code of Regulations requires all such unauthorized releases from underground tanks to be reported. An unauthorized release report must be filed with this office within 5 days of the date of this letter; in addition, you must initiate further investigation and/or cleanup activities at this site.

First, a preliminary assessment should be conducted to determine the extent of soil and groundwater contamination that has resulted from the leaking tank(s). The information gathered by this investigation will be used to assess the need for additional actions at the site. The preliminary assessment should be designed to provide all of the information in the format shown at the end of this letter. This format is based on the Regional Water Quality Control Board (RWQCB's) guidelines. You should be prepared to install one monitoring well, if you can verify the direction of groundwater flow in the immediate vicinity of the site, and three wells or piezometers, if you cannot.

Until cleanup is complete, you will need to submit reports to this office and to the RWQCB every three months (or at a more frequent interval, if specified at any time by either agency). These reports should include information pertaining to further investigative results; the methods and costs of cleanup actions implemented to date; and the method and location of disposal of any contaminated material.

Mr. Sullins
Arrow Rentals
RE: 187 N. L St.
July 25, 1989
Page 2 of 6

Soils contaminated at hazardous waste concentrations should be transported by a licensed hazardous waste hauler and disposed of or treated at a facility approved by the California Department of Health Services. Soils contaminated below the hazardous threshold may be managed as nonhazardous, but are still subject to the RWQCB's waste discharge requirements.

Your work plan should be submitted to this office within 30 days of the date of this letter. A report describing the results of the preliminary site assessment should be submitted within 60 days of the date of this letter. Copies of the proposal and report should also be sent to the RWQCB (attention: Lester Feldman). You may implement remedial actions before approval of the work plan, but final concurrence by this office will depend on the extent to which the work done meets the requirements described in this letter.

It is a violation of the California Health and Safety Code (Sec. 25299) for any owner or operator of an underground storage tank to:

1. Operate an underground storage tank without a permit;
2. Fail to monitor the tank as required by the permit;
3. Fail to maintain proper records;
4. Fail to report an unauthorized release;
5. Fail to properly close an underground storage tank;

Owners and operators of underground storage tanks may be liable for a civil penalty of up to \$5,000 per day per violation of the above provisions.

Additionally, you will need to submit a deposit of \$831 to cover costs that the Division of Hazardous Materials incurs during remediation oversight. Should you have any questions about this letter or about remediation requirements established by the RWQCB, please contact Lowell Miller, Senior Hazardous Materials Specialist, at 415/271-4320.

Sincerely,

Rafat A. Shahid

Rafat A. Shahid
Chief, Hazardous Materials Division

RAS:LM:mam

cc: Karen Majors, City of Livermore Redevelopment Agency
Lester Feldman, RWQCB
Lowell Miller, Alameda County Hazardous Materials Division
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

DAVID J. KEARS AGENCY

~~XXXXXXXXXX~~, Agency Director



Department of Environmental Health
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621

R0394

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December 19, 1988

~~XXXXXXXXXXXXXXXXXXXX~~
~~XXXXXXXXXXXXXXXXXXXX~~
(415) 271-4320

Ms. Ann McDonald, Senior Staff Scientist
Woodward-Clyde Consultants
Oakland City Center
500 - 12th St., Suite 100
Oakland, CA 94607-4014

Dear Ms. McDonald:

In response to your request of Dec. 8, 1988 for a record search of our files for an Environmental Site Assessment on the city block located on the North side of Railroad Ave. between North "L" and North "N" Streets in Livermore, CA. 94550, the following information is given.

1826 through 1954 Railroad Ave. Liv.	No Records
(R0394) 187 North "L" St.	Permit for one Underground Tank No record of contamination
149 through 153 North "L" Street	No Records
2008 1st St. Liv.	Site investigation in progress
(R0278) 2324 2nd St. Liv.	Three Underground tanks No record of contamination
200 to 375 feet West of "N" Street at the Railroad	No Record
2418 Railroad Ave. Liv.	No Record
1430 First St. Liv.	No Record
(R0684) 2388 Second St. Liv.	No Record
2324 Second St. Liv.	No Record
183 N. Livermore Ave. Liv.	No Record

Ms. Ann McDonald, Senior Staff Scientist
Woodward-Clyde Consultants
Oakland City Center
500 - 12th St., Suite 100
Oakland, CA 94607-4014
December 19, 1988
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222 Church St. Liv.

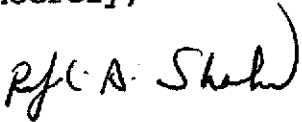
No Record

(R0769) 318 S. Livermore Ave. Liv.
(R02525)

Four underground Tanks
No record of contamination

If you have any questions, please call Edgar Howell, Program Administrator at, (415) 271-4320.

Sincerely,



Rafat Shahid, Chief
Hazardous Materials Program

RAS:mnc

cc: Edgar Howell
Files