



ENVIRONMENTAL HEALTH DEPARTMENT
ENVIRONMENTAL PROTECTION
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October 1, 2010

Angel LaMarca
Grimit Family Trust
945 S. Lehigh Drive
Anaheim Hills, CA 92807

Subject: Work Plan Approval for Fuel Leak Case No. RO0000413 and Geotracker Global ID T0600100667, Grit Auto Repair & Service, 1970 Seminary Avenue, Oakland, CA 94621

Dear Mr. LaMarca:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted documents entitled, *July 2009 Ground Water Sampling Report*, dated August 5, 2009, *Supplemental Subsurface Investigation Work Plan* that included a preliminary site conceptual model (SCM) dated May 20, 2009 which were prepared by Hoexter Consulting, Inc. and Addendum to Work Plan dated June 30, 2010 prepared by Stratus Environmental, Inc. The initial work plan included a site conceptual model and recommendations for soil vapor sampling, advancing nine soil borings using soil conductivity probe (SCP) and membrane interface probe (MIP) and then sampling soil and groundwater adjacent to these borings. Well MW-8 was proposed to be destroyed and replaced. The site wells would then be resurveyed to NAVD88. Stratus' work plan addendum proposed continuous soil coring using direct push rather than SCP/MIP, leaving MW-8 and installing 3 extraction wells for potential use in remedial action.

The scope of work presented in the work plan has not been adequately justified and cannot be approved at this time. ACEH requests that you address the following technical comments and send us a work plan addendum/ revised work plan as requested below.

TECHNICAL COMMENTS

1. **Free-Product Interim Remediation** – Free product has been consistently present in well MW-1 beginning in 2007 with a maximum thickness of 0.42 feet in July 2008. No efforts have been undertaken to remove free product at this site. Please submit your plan for interim remediation of the free product in the report requested below.
2. **Source Area Investigation vs. Proposed Remediation Wells** – Free product has been present in well MW-1 since 2007 in the area south of the former dispenser island. The source area and extent of free product has not been evaluated. Please propose a scope of work that will determine the extent of the free product in the dispenser area and adjacent to

MW-1 before remediation wells are installed. Note that MIP or installing temporary wells could be used to determine if free product is present rather than installing permanent wells at this time. Please include your proposal for this work in a work plan addendum by the due date requested below.

- 3. Proposed Boring Locations** – As reported previously, an irrigation well is located at 1955 Seminary Avenue in the downgradient direction for shallow groundwater. Only one soil boring was proposed along Seminary Avenue to determine if contamination is migrating off-site toward the irrigation well. The location and spacing of these borings appears insufficient to define the extent of contamination. Consider placing your soil borings along transects with appropriate spacing to define the extent of contamination.

In addition, the downgradient extent of vinyl chloride does not appear to have been evaluated for the deeper aquifer. Please propose borings to determine the extent of the vinyl chloride downgradient of MW-7. Please place the borings on an extended site plan showing the locations of buildings, dispenser islands, USTs, wells differentiating between “deep” and “shallow” screened wells and previous borings. Please include your proposal for this work in a work plan addendum by the due date requested below.

- 4. Soil Vapor Sampling** – ACEH concurs with the proposed soil vapor sampling locations. However, a detailed soil vapor sampling protocol was not presented in the original work plan. Please include soil vapor standard operating procedures in the brief work plan addendum requested below. ACEH recommends either installing permanent soil vapor probes using a shroud as per the DTSC/CRWQCB, LA Region joint Advisory for Active Soil Gas Investigations or installing probes as per the ITRC guidelines. In addition, please analyze soil vapor for oxygen, methane and carbon dioxide as specified in the DTSC/CRWQCB, LA Region joint Advisory for Active Soil Gas Investigations. Recommended sample depths are 5 feet and deeper.
- 5. Site Conceptual Model** – Thank you for submitting the preliminary site conceptual model. However, there appears to be some remaining data gaps that should be addressed before finalizing the work plan including the following; the cross-sections do not depict contaminant concentrations or water level data, free product now appearing in well MW-1 was not addressed (i.e. is well MW-1 screened appropriately, what are the hydrologic cycle influences on free product thickness, etc). Please provide a graph of MW-1 groundwater elevation and TPHg concentrations versus time. Include the top of the well screen elevation on the graph and note where sheen was observed or if free product was present but not recorded. Include updated cross-sections on a larger scale and groundwater elevation versus time graphs for all wells (note which wells are shallow and deep). Include an evaluation that addresses the data gaps noted above.
- 6. Irrigation Well Sampling** – The irrigation well located across the street was last sampled in 1994. Please resample the irrigation well while performing the investigation and ensure that the well’s location is shown on the map in your work plan addendum.
- 7. Ethanol and Methanol Analysis** – Please discontinue ethanol and methanol analysis during groundwater monitoring and from the proposed analysis for your borings since these analytes have not been detected at the site and the site is not an active gasoline station.

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8. **MW-8 Replacement and Survey** – ACEH understands that relocating this well is not possible at this time and resurveying this well may not change the groundwater contours. Please wait until new wells are installed to resurvey the entire site to NAVD88.

TECHNICAL REPORT REQUEST

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

- **November 20, 2010** –Work Plan Addendum

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 639-1287 or send me an electronic mail message at barbara.jakub@acgov.org.

Sincerely,

Barbara J. Jakub, P.G.
Hazardous Materials Specialist

Enclosure: Responsible Party(ies) Legal Requirements/Obligations
ACEH Electronic Report Upload (ftp) Instructions

cc: Scott Bittinger, Stratus Environmental Inc., 3330 Cameron Park Drive, Suite 550, Cameron Park, CA 95682 (sent via e-mail; sbittinger@stratusinc.net)
Leroy Griffin, Oakland, Fire Department (sent via e-mail; lgriffin@oaklandnet.com)
Donna Drogos, ACEH (Sent via E-mail to: donna.drogos@acgov.org)
Barbara Jakub, ACEH (Sent via E-mail to: barbara.jakub@acgov.org)
GeoTracker, e-file

Responsible Party(ies) Legal Requirements/Obligations

REPORT REQUESTS

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) GeoTracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

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

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- 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)

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
 - 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, Safari, and Firefox browsers will not open the FTP site.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - 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 @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) If site is a new case without an RO#, use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.