



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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October 12, 2012

Angel LaMarca (*Sent via E-mail to angelcpt@gmail.com*)

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

Peggy Garcia (*Sent via E-mail to peggy.h.garcia@sbcglobal.net*)

14618 Dublin Avenue
Gardena, CA 90549

Subject: Draft Feasibility Study Corrective Action Plan Fuel Leak Case No. RO0000413 and GeoTracker Global ID T0600100667, Grimit Auto Repair and Service, 1970 Seminary Avenue, Oakland, CA 94621

Dear Ms. La Marca and Ms. Garcia:

Thank you for the recently submitted documents entitled, *Feasibility Study/Corrective Action Plan* dated August 8, 2012, which was prepared by Stratus Environmental, Inc. for the subject site. Alameda County Environmental Health (ACEH) staff has reviewed the case file including the above-mentioned report for the above-referenced site. The FS/CAP presents three active remediation methods, with the timeframe to complete them, and proposes cleanup levels. Stratus recommends implementing temporary dual phase extraction (DPE) followed by ozone injection (OI).

The above-mentioned report does not include the depths of the proposed extraction and injection wells, an evaluation of chromium at the site, a contingency plan if hexavalent chromium is generated, and the requested work plan to evaluate the source area in the lower zone. Therefore, an adequate evaluation could not be performed. ACEH requests that you address the following technical comments and send us a revised CAP and work plan as requested below.

TECHNICAL COMMENTS

1. **Corrective Action Plan** – The FS/CAP identifies three different active remediation strategies and proposes the alternative with the least expensive and shortest timeframe, as determined by Stratus. This option is temporary dual-phase extraction (DPE) with in-situ chemical oxidation (ISCO). A pilot test has been performed for the DPE portion of the remedial alternative (Phase I of the remediation) but no pilot test has been performed or is proposed for the ozone injection (Phase II of the proposed remediation). Before ozone injection is performed, chromium samples should be collected from groundwater to determine if the addition of ozone will generate hexavalent chromium (CR⁺⁶). If this potential is present a contingency plan for CR⁺⁶ should be prepared and implemented as needed.

Please provide a discussion of the effectiveness of ISCO on tetrachloroethylene (PCE) degradation through ethene. ACEH is concerned that degradation will stall at the vinyl chloride stage leaving a much more toxic chemical in place of PCE. Please address this in the report requested below.

Radius of influence is estimated at 20 feet in this report. The borings and soil vapor points with the maximum PCE contamination detected are located approximately 15 to 20 feet away from the extraction wells. Understanding the space constraints, ACEH is still concerned that the spacing is not close enough to remediate these farther points with the highest concentrations. Please reevaluate the spacing or explain why this spacing is appropriate in the report requested below.

The depths of the vapor extraction and injection wells are not specified. Please present the well construction on your cross-sections.

2. **PCE Source Area** – Stratus suggests that the reason PCE in the lower zone is expanding in all directions is that there is a variable groundwater gradient at the site. While this may account for the concentration distribution, the groundwater source and extent of the contamination in this zone has not been adequately identified. PCE is present in deeper groundwater at concentrations well above the proposed cleanup goal of 5 µg/L. In addition, no deeper wells have been installed nor has an investigation been performed in the deeper zone in the suspected source area of the PCE or to define the lateral extent of the contamination. ACEH's letter dated May 31, 2012, requested a work plan to define the magnitude of the PCE source and lateral extent of PCE in the lower zone by June 29, 2012. This plan has not been received. Please submit the work plan by the due date requested below.

TECHNICAL REPORT REQUEST

Please upload technical reports to ACEH's ftp site and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below.

- **November 30, 2012** – Corrective Action Plan Addendum (Shallow Zone Remediation)
(File to be named: CAP_ADD_R_yyyy-mm-dd)
- **December 12, 2012** – Work Plan
(File to be named: WP_R_yyyy-mm-dd)

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If 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., 3380 Cameron Park Drive, Ste 550, Cameron Park, CA 95682 (Sent via E-mail to: sbittinger@stratusinc.net)
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (Sent via E-mail to: 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
File

Attachment 1
Responsible Party(ies) Legal Requirements/Obligations

REPORT/DATA REQUESTS

These reports/data are being requested pursuant to Division 7 of the California Water Code (Water Quality), Chapter 6.7 of Division 20 of the California Health and Safety Code (Underground Storage of Hazardous Substances), and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations (Underground Storage Tank Regulations).

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (Local Oversight Program [LOP] for unauthorized releases from petroleum Underground Storage Tanks [USTs], and Site Cleanup Program [SCP] for unauthorized releases of non-petroleum hazardous substances) require submission of reports in electronic format pursuant to Chapter 3 of Division 7, Sections 13195 and 13197.5 of the California Water Code, and Chapter 30, Articles 1 and 2, Sections 3890 to 3895 of Division 3 of Title 23 of the California Code of Regulations (23 CCR). Instructions for submission of electronic documents to the ACEH FTP site are provided on the attached "Electronic Report Upload Instructions."

Submission of reports to the ACEH FTP site is in addition to requirements for electronic submittal of information (ESI) to the State Water Resources Control Board's (SWRCB) Geotracker website. In April 2001, the SWRCB adopted 23 CCR, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1 (Electronic Submission of Laboratory Data for UST Reports). Article 12 required electronic submittal of analytical laboratory data submitted in a report to a regulatory agency (effective September 1, 2001), and surveyed locations (latitude, longitude and elevation) of groundwater monitoring wells (effective January 1, 2002) in Electronic Deliverable Format (EDF) to Geotracker. Article 12 was subsequently repealed in 2004 and replaced with Article 30 (Electronic Submittal of Information) which expanded the ESI requirements to include electronic submittal of any report or data required by a regulatory agency from a cleanup site. The expanded ESI submittal requirements for petroleum UST sites subject to the requirements of 23 CCR, Division, 3, Chapter 16, Article 11, became effective December 16, 2004. All other electronic submittals required pursuant to Chapter 30 became effective January 1, 2005. Please visit the SWRCB website for more information on these requirements: (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

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, 7835, 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, late 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 SCP)	REVISION DATE: July 25, 2012
	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 (petroleum UST and SCP) 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 deh.loptoxic@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 as they are NOT being supported at this time.
 - 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 deh.loptoxic@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.