



**CONESTOGA-ROVERS
& ASSOCIATES**

RECEIVED

2:35 pm, Apr 20, 2009

Alameda County
Environmental Health

5900 Hollis Street, Suite A, Emeryville, California 94608
Telephone: 510-420-0700 Facsimile: 510-420-9170
www.CRAworld.com

April 17, 2009

Reference No. 631000

Mr. Steven Plunkett
Hazardous Materials Specialist
Alameda County Environmental Health Services (ACEHS)
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Dear Mr. Plunkett:

Re: ACEH Letter of January 22, 2009 - Request for Extension
Estes Express Terminal (GI Trucking Co.)
1750 Davis Street
San Leandro, California
Fuel Leak Case No. RO0000442

On behalf of Estes Express Lines, Conestoga-Rovers & Associates (CRA) submits this letter in response to the ACEH letter of January 22, 2009. A copy of this letter is attached for your reference. Your letter requests the submittal of a workplan for Additional Source Area Characterization and a Site Conceptual Model (SCM) by April 22, 2009; and submittal of a First Semi-Annual Monitoring Report by April 30, 2009. Because the ultimate objective of Estes Express Lines is to achieve case closure for this site, we have been working with them to evaluate residual source material removal alternatives. Descriptions of site lithology and historical data suggest that hydrocarbons associated with the former UST pit remain very localized and the technical feasibility of excavation is being evaluated, as well as the possible use of in-situ chemical oxidation technology.

As a result of these evaluations, we are requesting an extension of the submittal of the SCM. With your concurrence, this document will be submitted by May 29, 2009. During this evaluation, Estes had requested that sampling of groundwater be postponed until a plan can be developed to effectively move the site toward closure. We will schedule groundwater monitoring and sampling of the site wells, and submit a report documenting this sampling by May 29, 2009. We also respectfully request your permission to submit the source delineation workplan after we obtain bids and complete our evaluation of source remedies, and after we determine the soil cleanup goals (see the ESL topic below).

Our recent correspondence, via email, regarding ESLs indicated that ACEH considers the groundwater beneath the site to be of beneficial use as a drinking water source. Our client wishes to pursue a reclassification of groundwater and, as such, we would like to acquire the County's procedures to present a case for reclassification.

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& ASSOCIATES**

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We appreciate the opportunity to work with you on this case. Please contact me at (510) 420-3348 to discuss any questions or comments you may have regarding this request.

Yours truly,
CONESTOGA-ROVERS & ASSOCIATES

Robert Foss

Robert Foss, P.G.

RF/hc/1
Encl.

cc: Mr. Bruce Hickman, Hart & Hickman, PC
Ms. Angela Maidment, Estes Express Lines

ALAMEDA COUNTY
HEALTH CARE SERVICES

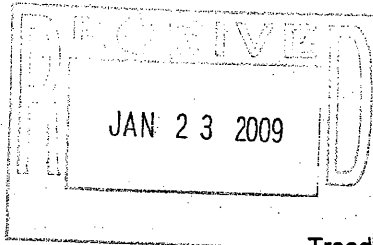
AGENCY

DAVID J. KEARS, Agency Director



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

January 22, 2009



Mike Rogers
ABF Freight Systems
P.O. Box 10048
Fort Smith, AR 72917-0048

Treedark Real Estate Corp
3801 Greenwood Road
Fort Smith, AR 72903

Estes Terminals California
3901 W. Broad Street
Richmond, VA 23230

Subject: Fuel Leak Case No. RO0000442 and GeoTracker Global ID T0600100900, GI Trucking Company, 1750 Adams Avenue, San Leandro, CA 94577

Dear Responsible Parties:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "~~Annual 2007 Monitoring Report and Preferential Pathway Study~~," dated ~~March 29, 2007~~, which was prepared by Cambria Environmental Technology, Inc. for the subject site. Cambria conducted groundwater sampling of the existing monitoring well network, a well survey and preferential pathway study to determine whether contaminants may be preferentially migrating off-site. Groundwater sampling analytical results detected sheen in RW-1. Cambria identified the closest well down-gradient to be over 1,000 feet away. Therefore, Cambria concluded that "it is unlikely that any of the wells at site K or any other downgradient site have been or are currently being impacted by the onsite groundwater plume." Cambria subsequently recommended that this case be considered a low risk groundwater case since "no significant migration of LNAPL or diesel plume is or has occurred at the site."

Based on the analytical results to date, which still identifies the presence of sheen on top of the groundwater at the site, ACEH cannot consider case closure for the subject site at this time since sites with sheen (i.e. free product) are not considered low risk groundwater cases. Additionally, the source area is not adequately characterized and the free and dissolved phase contaminant plumes are undefined. This decision to deny closure is subject to appeal to the State Water Resources Control Board (SWRCB), pursuant to Section 25299.39.2(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.

ACEH requests that you address the following technical comments and send us the technical work plan and reports requested below.

TECHNICAL COMMENTS

1. **Contaminant Source Area Characterization** – In June 1999, four 12,000-gallon fiberglass USTs were removed from the site. Significantly elevated concentrations of total petroleum

hydrocarbons (TPH) as diesel (d) were detected in excavation sidewall soil samples ranging from 85 mg/kg to 4,500 mg/kg. Additional excavation of contaminated soil was conducted to remove the significantly contaminated soil. Confirmation sidewall soil samples detected TPH-d ranging from 620 mg/kg to 2,400 mg/kg. Although naphthalene was not detected at the site, the laboratory detection limit that was reported was significantly elevated ranging from <10 mg/kg to <20 mg/kg. Please note that the Regional Water Quality Control Board's (RWQCB) Environmental Screening Levels (ESLs) for naphthalene and TPH-d are 1.3 mg/kg and 83 mg/kg, respectively, indicating that the site is not adequately characterized and poses a potential risk to human health and the environment. ~~Please propose a scope of work to address the above-mentioned concerns and submit a work plan due by the date specified below.~~

2. **Site Conceptual Model** – At this time, it ~~may be advantageous to develop a site conceptual model (SCM)~~, which synthesizes all the analytical data and evaluates all potential exposure pathways and potential receptors that may exist at the site, including identifying or developing site cleanup objectives and goals. At a minimum, the SCM should include:

- (1) Local and regional plan view maps that illustrate the location of sources (former facilities, piping, tanks, etc.) extent of contamination, direction and rate of groundwater flow, potential preferential pathways, and locations of receptors;
- (2) Geologic cross section maps that illustrate subsurface features, man-made conduits, and lateral and vertical extent of contamination;
- (3) Plots of chemical concentrations versus time;
- (4) Plots of chemical concentrations versus distance from the source;
- (5) Summary tables of chemical concentrations in different media (i.e. soil, groundwater, and soil vapor); and
- (6) Well logs, boring logs, and well survey maps;
- (7) Discussion of likely contaminant fate and transport.

If data gaps (i.e. potential contaminant volatilization to indoor air or contaminant leaching to groundwater, etc.) are identified in the SCM, please include a proposed scope of work to address those data gaps in the work plan due by the date specified below. ~~Please note that the work plan must address all technical comments presented in this correspondence and all data gaps identified in the SCM.~~

3. **Groundwater Contaminant Plume Monitoring** – Currently, annual groundwater sampling is being conducted. ~~Since steam continues to be present at the site, please increase the groundwater monitoring frequency to semi-annual and submit a report due by the dates specified below. Also, include naphthalene to the analytical sampling suite.~~

NOTIFICATION OF FIELDWORK ACTIVITIES

Please schedule and complete the fieldwork activities by the date specified below and provide ACEH with at least three (3) business days notification prior to conducting the fieldwork, including routine groundwater sampling.

TECHNICAL REPORT REQUEST

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

- **April 22, 2009** – Site Conceptual Model & Soil and Water Investigation Work Plan
- **April 30, 2009** – Semi-annual Monitoring Report (1st Quarter 2009)
- **October 30, 2009** – Semi-annual Monitoring Report (3rd Quarter 2009)

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

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload 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

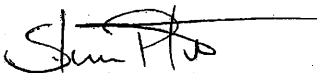
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

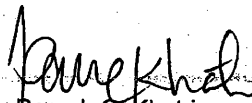
If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section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

If you have any questions, please call me at (510) 383-1767 or send me an electronic mail message at steven.plunkett@acgov.org.

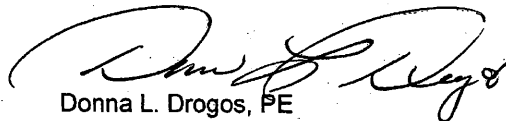
Sincerely,



Steven Plunkett
Hazardous Materials Specialist



Paresh C. Khatri
Hazardous Materials Specialist



Donna L. Drogos, PE
Supervising Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Conestoga Rovers & Associates (formerly Cambria Environmental Technology, Inc.), 5900 Hollis Street, Suite A, Emeryville, CA 94608
Donna Drogos, ACEH
Steven Plunkett, ACEH
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