



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

September 5, 2008

Roger Woodward
RL Woodward Industries
P.O. Box 2688
Dublin, CA 94568

Kewal Singh
Corwood Carwash
6973 Village Parkway
Dublin, CA 94568

Subject: Fuel Leak Case No. RO0002432 and Geotracker Global ID T06019701663, Corwood Carwash, 6973 Village Parkway, Dublin, CA 94568

Dear Mr. Woodward and Mr. Singh:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "SWI Summary of Findings," dated February 23, 2007, electronically received on March 1, 2007, which was prepared by Gribi Associates (Gribi) for the subject site. Gribi recommends regulatory closure based on the results of the recently completed subsurface investigation. Based on a review of the report, it appears that the scope of work was not completed in accordance with the conditions stipulated in the January 19, 2006 work plan approval letter (enclosed). Therefore, the report cannot be accepted since the scope of work does not appear to have been completed, hence an adequate review for case closure cannot be conducted. 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, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1. **Incomplete Scope of Work** – Our January 19, 2006 conditionally approved January 7, 2005, "Revised SWI Work Plan," prepared by Gribi Associates. Technical comment #3 of that approval letter states that "[i]n addition to the proposed parameters, TPHg, BTEX, oxygenates, and lead scavengers, we request that TPHd be also run on the soil and groundwater samples." It is stated in the report that soil and groundwater samples were analyzed for TPH-g, BTEX and oxygenates (TAME, TBA, DIPE, ETBE, and MTBE). The analyses for TPH-d and lead scavengers appear to have been omitted. Following the tank removals in January 2000, elevated concentrations of TPH-d, up to 1,800 mg/kg in soil and 190,000 µg/L in groundwater were detected in confirmation samples collected at the site. In a subsurface investigation conducted in March 2000, elevated concentrations of TPH-d were again confirmed at 600 mg/kg TPH-d in soil and 750,000 µg/L in groundwater. In January

2001, Gribi conducted another subsurface investigation at the site to delineate the extent of contamination with concentrations of TPH-d were detected as high as 4,600 mg/kg in soil. Based on the previous analytical results, the requested TPH-d analyses during the most recent site investigation appeared warranted. In addition, due to the apparent TPH-d impact to soil and groundwater, naphthalene analyses also appears warranted. Please address the above-mentioned concerns and submit a report by the date specified below.

2. **Soil Vapor Sampling** – A soil vapor sample was collected to evaluate the potential contaminant volatilization to indoor air exposure pathway at the site in January 2001. Concentrations of BTEX were detected below the Regional Water Quality Control Board's (RWQCB) Environmental Screening Levels (ESLs). However, analyses for oxygen, carbon dioxide, methane, or leak check compounds were not performed. Therefore, it is difficult to determine whether a leak occurred that diluted the sample or whether the sample is actually representative of subsurface conditions. Please address the above-mentioned concerns and submit a report by the date specified below.

3. **Analytical Data Tables** – In Table 1 of the March 9, 2000 "Report of Soil and Groundwater Investigation," MtBE is reported at a concentration of <20 milligrams per liter (mg/L) in "grab" groundwater sample IB-1W. However, the laboratory analytical sheet reports the result as <50 mg/L for sample IB-1W. In Section 4 in the text and Table 1 of the same report, 0.53 mg/L MTBE is reported to have been detected in "grab" groundwater sample IB-2W. However, the laboratory analytical sheet reports the concentration of MTBE in "grab" groundwater sample IB-2W as 0.270 mg/L. Please verify the actual concentrations detected and update the data tables accordingly.

TECHNICAL REPORT REQUEST

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

- **November 4, 2008** – Soil and Water Investigation Report

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.

September 5, 2008
RO0002432
September 5, 2008, Page 4

If you have any questions, please call me at (510) 777-2478 or send me an electronic mail message at paresh.khatri@acgov.org.

Sincerely,



Paresh C. Khatri
Hazardous Materials Specialist



Donna L. Drogos, PE
Supervising Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: James Gribi, Gribi Associates, 1090 Adams Street, Suite K, Benicia, CA 94510
Cheryl Dizon (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551
Donna Drogos, ACEH
Paresh Khatri, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SOVT
01-19-06

January 19, 2006

Mr. Roger Woodward
RL Woodward Industries
P.O. Box 2688
Dublin, CA 94568

Mr. Kewal Singh
Corwood Carwash
6973 Village Parkway
Dublin, CA 94568

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

Dear Messrs. Woodward and Singh:

Subject: Fuel Leak Site, RO0002432, Corwood Carwash, 6973 Village Parkway, Dublin, CA, 94568

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the subject site including the January 7, 2005 Revised SWI Workplan prepared by Gribi Associates. This work plan responds to the County's previous May 15, 2004 letter requesting additional information and sampling. The work plan also includes a conduit/well survey and a descriptive site conceptual model along with the revised work plan. The work plan proposes seven boring locations for the sampling of depth discrete soil and groundwater samples, with the intention to verify the three dimensional distribution of residual hydrocarbon contamination and ultimately obtain site closure. We request that you address the following technical comments when performing the proposed work and submit the technical report requested below.

TECHNICAL COMMENTS

1. Source area characterization- The lateral and vertical extent of contamination in soil and groundwater in the source areas has not yet been determined and is not addressed in the submitted work plan. Therefore, we request additional borings within and up-gradient of the dispenser areas to complete source area characterization. This work will either confirm or refute the assumption of the proposed SCM that the source is a "small area associated with the east fuel dispenser".
2. Plume characterization- Based upon groundwater gradient from previous monitoring, it appears that the groundwater flow is south-southeasterly. Therefore, we request that an additional boring be advanced immediately down-gradient of the former west dispenser, where residual contamination was detected.

The pattern of the proposed borings immediately down-gradient of the car wash building does not represent a realistic expectation of the plume shape and does not incorporate the previous investigation results. In the absence of preferential pathways, the plume is expected to migrate laterally in the direction of groundwater flow. The proposed borings #2,4,5 & 6 appear to be at the fringes of the anticipated

plume and would not allow significant refinement of the plume's dimension. The plume is more likely located between the east-west boundaries' of the car wash, therefore, borings would be better located between IB-3 and IB-4 and between IB-3 and boring 4. The need, the number and locations of the southernmost borings, proposed on the Midas Muffler property should reflect what is found in the borings along the southern property boundary and should be a part of the dynamic expedited site assessment. The goal is to provide both a planar and cross-section representation of the plume in your final report.

3. Soil and Groundwater Sampling and Analysis- The borings are proposed to be drilled to a depth of 50' and is based upon the presence of a shallow water bearing zone above 20' and the absence of multiple water bearings below this depth. If specific water bearing zones are identified during logging, groundwater samples will be collected from an adjacent borehole from the noted intervals. Soil samples will be analyzed based upon screening results ie odor, staining or elevated instrument readings and from locations of obvious lithologic change. In addition to the proposed parameters, TPHg, BTEX, oxygenates and lead scavengers, we request that TPHd be also run on the soil and groundwater samples.

TECHNICAL REPORT REQUEST

- January 31, 2006- Revised boring location figure (e mail).
- April 20, 2006- Soil and Groundwater Investigation Report
- April 20, 2006- Groundwater sampling report for MW-1

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.

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).

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 barney.chan@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

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.

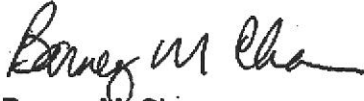
Messrs. Woodward and Singh

January 19, 2006

Page 4 of 4

If you have any questions, please call me at (510) 567-6765.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: files, D. Drogos

Mr. James Gribi, Gribi Associates, 1090 Adams St., Ste. K, Benicia, CA 94510

Matt Katen, Zone 7 Water Agency

1_18_06 6973 Village Parkway

| | |
|---|---|
| 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 |

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.

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 **CC4580**
Environmental Health Services
1131 Harbor Bay Pkwy, Suite 250
Alameda, CA 94502-6577



UNITED STATES POSTAGE

PITNEY BOWES
02 1M **\$ 00.59⁰**
0004256164 SEP 10 2008
MAILED FROM ZIP CODE 94502

RECEIVED

SEP 24 2008

ENVIRONMENTAL HEALTH SERVICES

Roger Woodward
RL Woodward Industries
P O Box 2688
Dublin, CA 94568

NIXIE 945 DE 1 00 09/23/08

RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

BC: 94502554031 *2905-05682-23-19

94502@6540

