

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



F

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

February 15, 2008

Mr. Cory Kauffmann
Cruise America, Inc.
11 West Hampton Avenue
Mesa, AZ 85210

Subject: Fuel Leak Case No. RO0002449 and Geotracker Global ID T06019713704, Cruise America, 796 66th Avenue, Oakland, CA 94621

Dear Mr. Kauffman:

I was recently assigned as the caseworker for this site. Please send any future correspondence for this case to my attention. Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the most recently submitted document entitled, "*Confirmation Investigation Workplan*," dated March 27, 2007. The Work Plan proposes a scope of work that includes five soil borings for confirmation soil and groundwater sampling and sampling of existing monitoring wells. Based upon our review, we have several comments that require limited revisions to the work plan. Therefore, we request that you prepare a Revised Work Plan that addresses the technical comments below.

REQUEST FOR INFORMATION

We request that you submit copies of the following documents, which are referenced in other technical reports but are not in the ACEH case file:

- Applied Geosystems, 1987. *Environmental Investigation Related to Underground Tank Removal*. February 13, 1987.
- Applied Geosystems, 1987. *Subsurface Investigation Report*. March 24, 1987.
- CSB Construction, Inc. 1989. Memorandum. November 13, 1989.
- Aqua Terra Technologies, 1988. Title and Date Unknown. Date on one site figure is December 1988.
- Purcell, Rhoades, & Associates, 1988. Title and Date Unknown.

We also note that soil borings and monitoring wells were advanced at the site by Purcell, Rhoades, & Associates in 1988. Please submit copies of any other reports for the site that describe or are related to environmental site characterization or remediation.

TECHNICAL COMMENTS

1. **Former McGuire-Hester Gasoline and Diesel USTs.** Based on the documents currently in the ACEH case file, it is not possible to confirm that the former McGuire-Hester gasoline and diesel USTs were removed and whether overexcavation of contaminated soil was conducted

during the tank removals. In the Revised Work Plan requested below, please provide a summary of the site history related to the former McGuire-Hester gasoline and diesel USTs including references to the source of the information.

2. **Waste Oil UST.** The report entitled, "*Phase I, Environmental Site Assessment, Cruise America Property, 796 66th Avenue, Oakland, California,*" dated April 4, 2001 and prepared by Purcell, Rhoades, & Associates, Inc. refers to contamination observed during grading in the area of the waste oil UST. The report states, "Based on information reviewed in this assessment to date, PRA has not found documentation that confirms whether the reported areas of contamination at former onsite gasoline tank and waste oil tank excavations were properly remediated." It is not clear whether the waste oil tank was removed and replaced during grading activities and whether overexcavation of contaminated soil was conducted. Therefore, we request that you provide a summary of the site history related to the waste oil UST including references to the source of the information. Based upon the results from previous excavation and/or sampling in the area of the waste oil UST, please propose investigation as necessary to characterize the extent of contamination.
3. **Proposed Soil Borings.** The proposed soil boring locations are acceptable for the proposed purposes of the borings. However, based upon the sanitary sewer trench likely being above groundwater throughout the site, boring SB-22 may be eliminated. We request that you extend one of the proposed borings or an additional soil boring to a depth of approximately 30 feet bgs to investigate the vertical extent of soil and groundwater contamination. Please include plans in the Revised Work Plan requested below to extend one soil boring to a depth of approximately 30 feet bgs to collect soil and depth-discrete groundwater samples.
4. **Sampling Monitoring Wells.** We concur with the proposal to sample the existing monitoring wells.
5. **Proposed Laboratory Analyses.** In addition to the proposed analytes, we request that you analyze all soil samples from proposed borings SB-13 through SB-20 for lead using EPA Method 6010. For soil samples from proposed soil boring SB-21 near the waste oil UST, we request that you include analysis for TPH as diesel using EPA Method 8015, PCBs using EPA Method 8082, chlorinated hydrocarbons using EPA Method 8260, and metals (cadmium, chromium, lead, nickel, and zinc) using EPA Method 6010 in addition to the proposed analyses. Please include these plans in the Revised Work Plan requested below.

TECHNICAL REPORT REQUEST

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

- **Revised Work Plan** – April 25, 2008

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

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).

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.

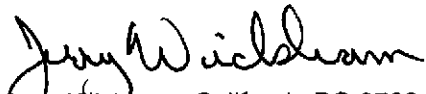
Cory Kauffmann
RO0002449
February 15, 2008
Page 4

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 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Adrian Angel
AEI Consultants
2500 Camino Diablo, Suite 200
Walnut Creek CA 94597

Donna Drogos, ACEH
Jerry Wickham, ACEH
File