

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RD 2571

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

August 31, 2006

Val Schuster
C/o Saturn Retail of South Carolina
100 Renaissance Center
Mail Code: 482-A05-B45
Detroit, MI 48265-1000

D.M. Nohr
11 Twelve Oaks Drive
Pleasanton, CA 94588-8210

Subject: SLIC Case No. RO0002571, Saturn of Pleasanton, 4340 Rosewood Drive, Pleasanton, CA – Comments on Soil and Groundwater Investigation Report

Dear Val Schuster:

Alameda County Environmental Health (ACEH) staff has received the report entitled, "Soil and Groundwater Investigation (Revised)," dated June 30, 2006. The "Soil and Groundwater Investigation," report presents the results of soil and groundwater sampling from four soil borings. Several items, which are identified in the comments below, are missing or require confirmation. We request that you submit these items in order for you case to progress.

We request that you address the following comments, perform the proposed work, and send us the items described below.

TECHNICAL COMMENTS

1. **Request for Closure and Perjury Statement.** The "Soil and Groundwater Investigation," report states that, "no additional investigation or remediation is recommended at this time," but does not specifically request case closure. If case closure is requested, please submit a statement requesting case closure signed by the active responsible party. In addition, the report submittal did not include a perjury statement from the responsible party, which is a requirement as outlined in a later section of this letter. Please submit a perjury statement and confirmation of your request for case closure signed by the active responsible party by September 30, 2006.
2. **Updated Responsible Party Information.** Please confirm by September 30, 2006, that D.M. Nohr is the current site owner and that the address shown at the top of this letter is correct for D.M. Nohr. Please also confirm that the site owner has been notified of potential case closure.
3. **Geotracker EDF Submittals.** In correspondence dated March 30, 2006, we previously requested that you upload the required data and reports to the State Water Resources

Control Board's (SWRCB) Geotracker website by July 7, 2006. A review of the Geotracker website indicates that electronic copies of analytical data or reports have not been submitted for your site. Pursuant to CCR Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports (LUFT or SLIC) is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload all SLIC analytical data and copies of reports post July 1, 2005, to the SWRCB's Geotracker database website in accordance with the above-cited regulation by October 15, 2006. Compliance with the Geotracker requirements is required in order for the case to be closed.

TECHNICAL REPORT REQUEST

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

- **September 30, 2006** – Perjury Statement, Confirmation of Request for Case Closure, and Updated Responsible Party Information
- **October 15, 2006** – Compliance with Geotracker Requirements

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

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).

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 case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

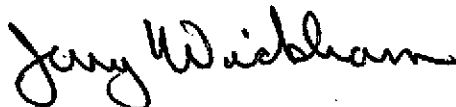
The California Business and Professions Code (Sections 6735, 7835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For 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.

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.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

Val Schuster
D.M. Nohr
August 31, 2006
Page 4

cc: Deena VanCamp, Remediation Team, 2000 Centerpoint Parkway, Mail Code: 483-520-190,
Pontiac, MI 48341-3147

Robert Siegfried, Encore Environmental Consortium, LLC, 6723 Towpath Road, Box 66,
Syracuse, NY 13214-0066

Martha Darnton, Encore Environmental Consortium, LLC, 620 South Capitol Avenue, Suite
100, Lansing, MI 48933

Jennifer Quigley, Encore Environmental Consortium, LLC, 620 South Capitol Avenue, Suite
100, Lansing, MI 48933

Colleen Winey, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway, Livermore,
CA 94551

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street,
Pleasanton, CA 94566

Donna Drogos, ACEH
Jerry Wickham, ACEH
File RO2571

**Alameda County Environmental Cleanup
Oversight Programs
(LOP and SLIC)**

ISSUE DATE: July 2005

REVISION DATE: May 31, 2006

PREVIOUS REVISIONS: October 31, 2005,
December 16, 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: **ftp Site Coordinator**.
 - 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
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

March 30, 2006

Val Schuster
C/o Saturn Retail of South Carolina
100 Renaissance Center
Mail Code: 482-A05-B45
Detroit, MI 48265-1000

Subject: SLIC Case No. RO0002571, Saturn of Pleasanton, 4340 Rosewood Drive, Pleasanton, CA – Comments on Soil and Groundwater Investigation Report

Dear Val Schuster:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site and the report entitled, "Soil and Groundwater Investigation," dated March 6, 2006 prepared on behalf of Saturn of Pleasanton by Encore Environmental Consortium, LLC. The "Soil and Groundwater Investigation," report presents the results of soil and groundwater sampling from four soil borings. The report recommends that no additional investigation or remediation is needed at this time. In order to evaluate the conclusions and recommendations presented in the report, we request that a revised report be submitted by July 7, 2006 to address the technical comments below.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Historical Data.** The report makes conclusions regarding the extent of contamination in soil and groundwater at the site and presents recommendations regarding the need for future work but only includes the most recent data from four soil borings. Presentation and review of historical data is needed to support the conclusions presented. Please include historical data tables, which include all soil and groundwater data collected to date. Please also include separate figures that include historical and recent data to show the distribution of selected chemicals detected in soil and groundwater.
2. **Groundwater Use.** Groundwater in the Livermore-Amador Groundwater Basin is a source of drinking water. Chemical concentrations in groundwater should not be compared to screening criteria for locations where groundwater is not a potential source of drinking water. The proximity of water supply wells to the site and current and potential future use of groundwater near the site are to be discussed in the report but statements indicating that groundwater at the site is not a potential source of drinking water or the application of screening criteria for groundwater that is not a potential drinking water source are to be deleted.

3. **Environmental Screening Levels.** As discussed in comment 1 above, the Environmental Screening Levels (ESLs) that apply where groundwater is not a potential source of drinking water are not appropriate for this site and are to be removed. Table 3 (Summary of Detected Parameters in Groundwater Samples) of the report incorrectly identifies the screening criteria in the first column as "SF Bay RWQCB ESLs for Deep Soil >3m bgs, GW IS a Potential Drinking Water Source." Please note that ESLs for Deep Soil are applied to soil and are expressed in milligrams per kilogram (mg/kg). The ESLs listed in Table 3 actually appear to be ESLs for groundwater that is a current or potential drinking water source (Table F-1a of the San Francisco Bay Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater, Interim Final – February 2005). Please correct the reference in Table 3 to accurately identify the ESLs. For clarity, please include a reference to identify the table in the San Francisco Bay Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater, Interim Final – February 2005 from which the ESLs were derived. In addition, please correct the references in the text to ESLs for Deep Soil when actually discussing groundwater ESLs.
4. **Private Well and Well Survey.** Please include a map showing the location of all wells within ½ mile of the site. Please reference the wells by the well identification number used by Zone 7 to avoid ambiguity. Please also provide sufficient detail regarding the construction of the well in order to assess whether the well may be a receptor for the site. These items are to be presented in the revised report requested below.
5. **Cross Section.** Please revise the cross section to accurately show all groundwater samples and analytical data, including historical groundwater analytical data collected. Currently, only sample results from two of the most recent borings are presented on the cross section but the data are not complete. The sample results from 50-55 feet below ground surface (bgs) in SB-VAS-2 are missing and no data are presented for SB-VAS-3. Dashes are shown for some results, implying that the analytes were not detected even though the tables indicate that the chemicals were detected or no analyses were conducted. As an example, dashes are shown for TPH-DRO and tert-butyl alcohol for the 50-55 feet bgs sample in SB-VAS-1. However, as listed in Table 3, tert-butyl alcohol was detected at 8.8 micrograms per liter (µg/L) in the sample and no analyses were apparently conducted for TPH-DRO. Individual sample intervals are to be depicted and labeled for each boring. Soil contacts are to be dashed or queried where inferred or uncertain. Specifically, the elliptical body of silts shown in borings SB-9 and SB-VAS-1 should be revised. If no data are available from boring SB-VAS-3 to indicate where the silts end, please use a query to show the lack of data to the south rather than drawing an elliptical layer of silts ending at SB-VAS-3. In addition, north and south labels are to be included to show the orientation of the cross section.
6. **California Professional Geologist Certification.** Please include the California Professional Geologist registration number for the individual responsible for the report or include a professional registration stamp in the revised report requested below.
7. **Geotracker EDF Submittals -** A review of the case file and the State Water Resources Control Board's (SWRCB) Geotracker website indicate that electronic copies of analytical data have not been submitted for your site. Pursuant to CCR Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, beginning

January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports (LUFT or SLIC) is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload all SLIC analytical data and copies of reports post July 1, 2005, to the SWRCB's Geotracker database website in accordance with the above-cited regulation. Please perform the electronic submittals for applicable data and submit verification to this Agency by **July 7, 2006**.

TECHNICAL REPORT REQUEST

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

- **July 7, 2006** – Revised Soil and Groundwater 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

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 jerry.wickham@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, 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

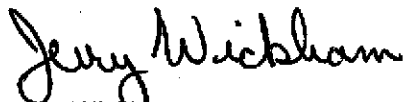
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

Val Schuster
March 30, 2006
Page 5

cc: Deena VanCamp, Remediation Team, 2000 Centerpoint Parkway, Mail Code: 483-520-190,
Pontiac, MI 48341-3147

Robert Siegfried, Encore Environmental Consortium, LLC, 6723 Towpath Road, Box 66,
Syracuse, NY 13214-0066

Martha Darnton, Encore Environmental Consortium, LLC, 620 South Capitol Avenue, Suite
100, Lansing, MI 48933

Jennifer Quigley, Encore Environmental Consortium, LLC, 620 South Capitol Avenue, Suite
100, Lansing, MI 48933

Matt Katen, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway, Livermore, CA
94551

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street,
Pleasanton, CA 94566

Donna Drogos, ACEH
Jerry Wickham, ACEH
File RO2571

**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
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
9-13-05

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

September 12, 2005

Val Schuster
C/o Saturn Retail of South Carolina
100 Renaissance Center
Mail Code: 482-A05-B45
Detroit, MI 48265-1000

Subject: TOXICS Case No. RO0002571, Saturn of Pleasanton, 4340 Rosewood Drive, Pleasanton, CA – Work Plan Approval

Dear Val Schuster:

Alameda County Environmental Health (ACEH) staff has reviewed the case file and the work plan entitled, "Site Assessment Work Plan," dated April 26, 2005 prepared for the above referenced site on behalf of Saturn of Pleasanton by Encore Environmental Consortium, LLC. The Site Assessment Work Plan proposes soil sampling and depth-discrete groundwater sampling at three locations. ACEH concurs with the Work Plan provided that the technical comments below are addressed during the field investigation.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to jerry.wickham@accgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Selection of Soil Samples for Laboratory Analyses.** ACEH concurs with the approach to collect soil samples from zones exhibiting evidence of contamination. Please collect soil samples from each zone where field observations indicate fuel hydrocarbon impact and from the soil directly below the impacted zone.
2. **Groundwater Sampling.** The Work Plan indicates that groundwater samples will be collected at 10-foot intervals beginning at the water table, dependent upon stratigraphic conditions determined during the installation of SB-9. We concur with the approach to adjust the depth intervals for discrete groundwater sampling based on encountered stratigraphic conditions. Please adjust the intervals as necessary to assure that groundwater samples are collected from each significant water-bearing zone encountered.
3. **Laboratory Analyses.** In addition to the proposed analytes, please include laboratory analyses for total petroleum hydrocarbons as gasoline, total petroleum hydrocarbons as diesel, TAME, ETBE, DIPE, TBA, ethanol, and 1,4-dioxane for all soil and groundwater samples.

4. **Private Well.** Please provide information on the depth, construction, and current status of the private well, which is located 300 feet west of the site. In the Site Investigation Report requested below, please provide an evaluation of the potential for VOC contamination from the site to reach the private well.
5. **Cross Sections.** Please provide a north-south cross section that shows the types of soils encountered, depths where soil and groundwater samples have been collected and sample results, and location of the former oil/water separator and drain lines. The cross section is to be provided in the Soil and Groundwater Investigation Report requested below.

TECHNICAL REPORT REQUEST

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

- **January 31, 2006** – Soil and Groundwater 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) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy 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 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, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic reporting](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

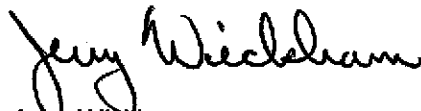
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Deena VanCamp, Remediation Team, 2000 Centerpoint Parkway, Mail Code: 483-520-190,
Pontiac, MI 48341-3147

Robert Siegfried, Encore Environmental Consortium, LLC, 6723 Towpath Road, Box 66,
Syracuse, NY 13214-0066

Jennifer Quigley, Encore Environmental Consortium, LLC, 620 South Capitol Avenue, Suite
100, Lansing, MI 48933

Val Schuster
September 12, 2005
Page 4

Colleen Winey, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway, Livermore,
CA 94551

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street,
Pleasanton, CA 94566

Donna Drogos, ACEH
Jerry Wickham, ACEH
File RO2571

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SCWT
8-19-04

August 17, 2004

Saturn Corporation
Attn. Deena Van Kamp
2000 Centerpoint Parkway
Mail Code 483-520-190
Pontiac, MI 48341-3147

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

Subject: Toxics Case RO0002571, 4340 Rosewood, Pleasanton, California

Dear Ms. Van Kamp:

Our records indicate that there is no remaining balance in the oversight account for the above-referenced Toxics case. In order to continue to provide regulatory oversight, ACEH requests a deposit of \$6,000.00. Please send a check for the total amount, payable to Alameda County Environmental Health. Please send your check to the attention of our Finance Department.

This deposit may or may not be sufficient to provide all necessary regulatory oversight. ACEH will deduct actual costs incurred based upon the hourly rate specified below. If these funds are insufficient, additional deposit will be requested. Otherwise, any unused monies will be refunded to you or your designee.

The deposit is authorized by Section 6.92.040 of the Alameda County Ordinance Code. Work on this project is being debited at the Ordinance specified rate, currently \$160.00 per hour.

Please write "Toxics" (the type of project), the site address and AR# 310519 on your check.

If you have any questions regarding this request, please call Bob Schultz at (510) 567-6719.

Sincerely,

Ariu Levi
Division Chief

cc: Jennifer Quigley, CRA, 620 South Capitol, Suite 100, Lansing, Michigan 48933
Donna Drogos, ACEH
Bob Schultz, ACEH

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

July 16, 2003

Ms. Jennifer Quigley
Encore Environmental Consortium, LLC
620 South Capitol Ave., Suite 100
Lansing, MI 48933

Dear Ms. Quigley:

Subject: Site Mitigation Case RO0002571, 4340 Rosewood Drive, Pleasanton, CA 94588

This letter confirms that additional analysis for the entire suite of waste oil parameters is required for soil sample(s) by our office to characterize the release from the removed oil-water separator at the above referenced location. I have enclosed copies of several documents mentioned in our conversation:

- Recommended Minimum Verification Analyses for Underground Tank Leaks
- Risk-Based Screening Levels and Decision Making to Sites With Impacted Soil and Groundwater prepared by the San Francisco Regional Water Quality Control Board. You are encouraged to obtain a copy of the entire document. Specific information can be obtained from Roger Brewer of the Water Board at 510-622-2374.

You are also reminded that our office and that of the Livermore Pleasanton Fire Department must be provided copies of all analytical results for soil samples taken after the oil water separator removal prior to determining if appropriate source removal has occurred.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

enclosures

C: B. Chan, D. Drogos

Mr. Paul Smith, Livermore Pleasanton Fire Dept., 3560 Nevada St., Pleasanton, CA 94566
Mr. Rob Fogal, Saturn Corp., Inc., 1996 Technology Drive, Troy MI 48083

Analysis4340RosewoodDr

**TABLE C-2. RISK-BASED SCREENING LEVEL COMPONENTS
FOR *SUBSURFACE SOIL (>3m bgs)
(potentially impacted groundwater IS a current or potential drinking water resource)**

CHEMICAL	COMMERCIAL / INDUSTRIAL CATEGORY (mg/kg)						
	Final RBSL	Ceiling Value (Odors, etc.) Table H-3	Human Health				Groundwater Protection (Soil Leaching)
			Substitute Direct Contact		Direct Contact	Indoor Air Impacts	Drinking Water Resource
			Value	Basis	Table K-3	Table E-1	Table G
CHLOROFORM	0.58 (0.88)	2500			3.2 nc	0.58 (5.1)	0.88
CHLOROMETHANE	0.46	1000			110 ca	1.7 (1.7)	0.46
CHLOROPHENOL, 2-	0.012	1000			500 nc	19 (2800)	0.012
CHROMIUM (Total - assumes 1/6 ratio Cr6/Cr3)	12	5000			12 ca	-	-
CHROMIUM III	5000	5000			800000 nc	-	-
CHROMIUM VI	1.8	5000			1.8 ca	-	-
CHRYSENE	4.7	5000			120 ca	-	4.7
COBALT	5000	5000			32000 nc	-	-
COPPER	5000	5000			20000 nc	-	-
CYANIDE (Free)	1000	1000			6600 nc	-	12000
DIBENZO(a,h)ANTHTRACENE	3.5	2500			3.5 ca	-	55
DIBROMOCHLOROMETHANE	8.3	1000			88 ca	-	8.3
DIBROMOETHANE, 1,2-	0.0003	2500			5.4 nc	-	0.0003
DICHLORO BENZENE, 1,2-	0.75	370			370 sat	68 (370 sat)	0.75
DICHLOROBENZENE, 1,3-	5.3	380			100 nc	-	5.3
DICHLORO BENZENE, 1,4-	0.49 (0.59)	2500			160 ca	0.49 (43)	0.59
DICHLOROBENZIDINE, 3,3-	0.080	2500			13 ca	-	0.080
DICHLORODIPHENYLDICHLOROETHANE (DDD)	91	2500			91 ca	-	750
DICHLORODIPHENYLDICHLOROETHYLENE (DDE)	64	2500			64 ca	-	1100
DICHLORODIPHENYLTRICHLOROETHANE (DDT)	4.3	5000			64 ca	-	4.3
DICHLOROETHANE, 1,1	0.22	2300			300 ca	1.9 (13)	0.22
DICHLOROETHANE 1,2	0.006	2500			40 ca	0.12 (3.0)	0.006
DICHLOROETHYLENE, 1,1	0.062 (0.12)	1600			4.6 ca	0.062 (0.12)	1.0
DICHLOROETHYLENE, Cis 1,2	0.19	1000			340 nc	7.7 (56)	0.19
DICHLOROETHYLENE, Trans 1,2-	0.65	2500			510 nc	15 (55)	0.65
DICHLOROPHENOL, 2,4-	0.30	2500			970 nc	-	0.30
DICHLOROPROPANE, 1,2-	0.13	1000			34 ca	0.17 (2.1)	0.13
DICHLOROPROPENE, 1,3	0.057	1100			17 ca	0.19 (0.38)	0.057
DIELDRIN	0.002	5000			1.0 ca	-	0.002

RECOMMENDED MINIMUM VERIFICATION ANALYSES FOR UNDERGROUND TANK LEAKS

For Use by Unidocs Member Agencies or where approved by your Local Jurisdiction

TABLE #2
REVISED 1 MARCH 1999

<u>HYDROCARBON LEAK</u>	<u>SOIL ANALYSIS</u> (SW-846 METHOD)		<u>WATER ANALYSIS</u> (Water/Waste Water Method)	
Gasoline (Leaded and Unleaded)	TPHG	8015M or 8260	TPHG	8015M or 524.2/624 (8260)
	BTEX	8260	BTEX	524.2/624 (8260)
	EDB and EDC	8260	EDB and EDC	524.2/624 (8260)
	MTBE, TAME, ETBE, DIPE, and TBA by	8260 for soil and	524.2/624 (8260) for water	
	TOTAL LEAD	AA	TOTAL LEAD	AA
		--Optional--		
	Organic Lead	DHS-LUFT	Organic Lead	DHS-LUFT
Unknown Fuel	TPHG	8015M or 8260	TPHG	8015M or 524.2/624 (8260)
	TPHD	8015M or 8260	TPHD	8015M or 524.2/624 (8260)
	BTEX	8260	BTEX	524.2/624 (8260)
	EDB and EDC	8260	EDB and EDC	524.2/624 (8260)
	MTBE, TAME, ETBE, DIPE, and TBA by	8260 for soil and	524.2/624 (8260) for water	
	TOTAL LEAD	AA	TOTAL LEAD	AA
	--Optional--			
	Organic Lead	DHS-LUFT	Organic Lead	DHS-LUFT
Diesel, Jet Fuel, Kerosene, and Fuel/Heating Oil	TPHD	8015M or 8260	TPHD	8015M or 524.2/624 (8260)
	BTEX	8260	BTEX	524.2/624 (8260)
	EDB and EDC	8260	EDB and EDC	524.2/624 (8260)
	MTBE, TAME, ETBE, DIPE, and TBA by	8260 for soil and	524.2/624 (8260) for water	
Chlorinated Solvents	CL HC	8260	CL HC	524.2/624 (8260)
	BTEX	8260 or 8021	BTEX	524.2/624 (8260) or 502.2/602 (8021)
Nonchlorinated Solvents	TPHD	8015M or 8260	TPHD	8015M or 524.2/624 (8260)
	BTEX	8260 or 8021	BTEX	524.2/624 (8260) or 502.2/602 (8021)
Waste, Used, or Unknown Oil	TPHG	8015M or 8260	TPHG	8015M or 524.2/624 (8260)
	TPHD	8015M or 8260	TPHD	8015M or 524.2/624 (8260)
	O&G	9070	O&G	418.1
	BTEX	8260	BTEX	524.2/624 (8260)
	CL HC	8260	CL HC	524.2/624 (8260)
	EDB and EDC	8260	EDB and EDC	524.2/624 (8260)
	MTBE, TAME, ETBE, DIPE, and TBA by	8260 for soil and	524.2/624 (8260) for water	
	METALS (Cd, Cr, Pb, Ni, Zn) by ICAP or AA for soil, water			
	PCB*, PCP*, PNA, CREOSOTE by	8270 for soil and	524/625 (8270) for water	
			If found, analyze for dibenzofurans (PCBs) or dioxins (PCP)	

NOTES:

1. 8021 replaces old methods 8020 and 8010
2. 8260 replaces old method 8240
3. Reference: Table B-1 in Appendix B of "Expedited Site Assessment Tools for Underground Storage Tank Sites: A Guide for Regulators" (EPA 510-B-97-001).

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



07-02-03

July 2, 2003

Ms. Jennifer Quigley
Encore Environmental Consortium, LLC
620 South Capitol Ave., Suite 100
Lansing, MI 48933

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

Dear Ms. Quigley:

Subject: Deposit for Saturn of Pleasanton, 4340 Rosewood Drive, Pleasanton, CA 94588

Please submit a deposit of \$3000 payable to Alameda County, Environmental Health Services so we may provide regulatory oversight for the referenced project. It is expected that the amount requested will allow the project to be completed with a zero balance. Otherwise, additional deposit will be requested, or any unused monies will be refunded to you or your designee.

The deposit/refund mechanism is authorized in Section 6.92.060 of the Alameda County Ordinance Code. Work on the project will be debited at the Ordinance specified rate, currently \$158 per hour.

Please write the following identifying information on your check or cover letter.

- Type of project (site mitigation-SLIC)
- Site address (4340 Rosewood Drive, Pleasanton)
- RO0002571

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

Sincerely,

A handwritten signature in black ink that reads "Barney M. Chan". The signature is fluid and cursive.

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, D. Drogos

Mr. Rob Fogal, Saturn Corp., Inc., 1996 Technology Drive, Troy MI 48083

Dep4340RosewoodDr