

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT
d-2604

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

January 24, 2006

J. Mark Inglis
ChevronTexaco
6001 Bollinger Canyon Rd., K2256
P.O. Box 6012
San Ramon, CA 94583-2324

Mary Harvey
Hexcel Corporation
75 N. Mines Road
Livermore, CA 94550

Bruce Qvale
First Street LLC
3800 First Street
Livermore, CA 94550

Subject: Fuel Leak Case No. RO0002611, Livermore Honda, 3884 First Street, Livermore, CA

Dear Mr. Inglis, Mr. Qvale, and Ms. Harvey:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site and the document entitled, "Workplan for Site Excavation," dated January 18, 2006. The work plan was prepared on behalf of Chevron Environmental Management Company by Cambria Environmental Technology, Inc and presents plans to excavate petroleum-impacted soil within three areas of the site. ACEH concurs with the proposed plan to excavate petroleum-impacted soil within three proposed areas of the site. However, high concentrations of petroleum hydrocarbons were also detected in shallow soil in the area of boring B-2. Therefore, soil excavation of the area around boring B-2 is required in addition to the three areas proposed in the Work Plan (please see technical comment 1).

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

TECHNICAL COMMENTS

1. **Area of Boring B-2.** The boring log for boring B-2 describes petroleum odor in the soil from 2 to 15 feet below ground surface (bgs). The soil sample collected from a depth of 5 feet bgs in boring B-2 contained an estimated concentration of 40,000 milligrams per kilogram (mg/kg) of total recoverable petroleum hydrocarbons (TRPH). The soil sample collected from a depth of 10 feet bgs had an estimated concentration of 14,000 mg/kg of TRPH. Petroleum hydrocarbons were not detected in the soil sample collected at a depth of 15 feet bgs in boring B-2. Due to the elevated concentrations of petroleum hydrocarbons detected in shallow soil in the area of boring B-2, excavation is to be conducted to remove visibly stained and odorous shallow soil in the area surrounding boring B-2. Please present the results of soil excavation, removal, and confirmation sampling in the area of boring B-2 in the report requested below.

2. **Soil Confirmation Sampling.** The Work Plan indicates that, "Confirmation soil samples from sidewalls and the excavation base will be collected where soils appear clean." This statement is ambiguous and should be revised to, "when soils appear clean." In no case shall confirmation soil samples be collected preferentially from locations within the excavation where soils appear clean. The excavations are to be continued to remove areas of visibly stained and odorous soils to an extent that does not jeopardize worker or public safety prior to confirmation sampling. Confirmation soil samples are to be collected from the sidewalls at horizontal intervals no greater than 15 feet at approximate depths where soil contamination was previously observed in the excavation. The number of soil samples collected from the bottom of the excavation is to be based on the size of the excavation but should be no less than a minimum of four confirmation soil samples from the base of each excavation. Please present results of the soil confirmation sampling in the report requested below.

TECHNICAL REPORT REQUEST

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

- **May 3, 2006 – Soil Removal and Confirmation Sampling 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, 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

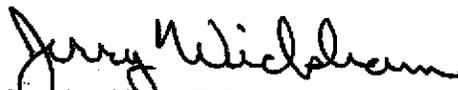
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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, P.G.
Hazardous Materials Specialist

J. Mark Inglis, Bruce Qvale, and Mary Harvey
January 24, 2006
Page 4

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Laura Genin, Cambria Environmental Technology, Inc., 5900 Hollis Street, Suite A
Emeryville, CA 94608

Robert Foss, Cambria Environmental Technology, Inc., 5900 Hollis Street, Suite A
Emeryville, CA 94608

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

Stephen Clowdsley, Real Estate Consulting, 1561 Ramona Way, Alamo, CA 94507

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



sent
11-17-05

ENVIRONMENTAL HEALTH SERVICES
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November 15, 2005

J. Mark Inglis
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Mary Harvey
Hexcel Corporation
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Livermore, CA 94550

Bruce Qvale
First Street LLC
3800 First Street
Livermore, CA 94550

Subject: Fuel Leak Case No. RO0002611, Livermore Honda, 3884 First Street, Livermore, CA

Dear Mr. Inglis, Mr. Qvale, and Ms. Harvey:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site and the document entitled, "Additional Subsurface Investigation Report," dated October 18, 2005 and received by ACEH on October 21, 2005. The report was prepared on behalf of Chevron Environmental Management Company by Cambria Environmental Technology, Inc and presents the results of cone penetrometer testing (CPT), soil sampling, groundwater sampling, and soil vapor sampling conducted at the site during September 2005. During the September 2005 investigation, fuel hydrocarbons were detected in soil, soil vapor, and groundwater in the area of the first generation and second generation USTs and dispensers. Total petroleum hydrocarbons as gasoline (TPHg) and benzene were detected in soil vapor at concentrations exceeding environmental screening levels for vapor intrusion to indoor air for both residential and commercial use (San Francisco Bay Regional Water Quality Control Board, February 2005). Total petroleum hydrocarbons as diesel (TPHd) were detected in groundwater in each of the 8 groundwater samples analyzed for TPHd at concentrations up to 15,000 micrograms per liter ($\mu\text{g/L}$). TPHg was detected in groundwater in 4 of the 11 samples analyzed at concentrations up to 13,000 $\mu\text{g/L}$.

Based on the results presented in the report, soil remediation will be required in a portion of the site prior to development for residential use. ACEH concurs with the recommendation to prepare a plan for excavation of soil in the area of the first and second generation USTs and the northern second generation dispenser island prior to redevelopment of the site. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Soil Vapor Sampling Results.** The presentation of soil vapor sampling results did not include a discussion of the detection of 2-propanol in five samples. Potential data quality issues related to the detection of a leak check compound should have been discussed. In

particular, data quality issues related to the high concentrations of 2-propanol detected in sample CPT-8-SV-9.5 should have been discussed. Please note that the laboratory report for sample CPT-8-SV-9.5 indicates that 9,200,000 $\mu\text{G}/\text{m}^3$ of 2-propanol was detected rather than 920,000 $\mu\text{G}/\text{m}^3$ as shown in Table 1 and that 4,600,000 $\mu\text{G}/\text{m}^3$ of TPH were detected rather than 460,000 $\mu\text{G}/\text{m}^3$ as shown in Table 1. In addition, the concentration of benzene in sample CPT-3-SV-15 was 22,000 $\mu\text{G}/\text{m}^3$ rather than 220,000 $\mu\text{G}/\text{m}^3$ as shown in Table 1 and discussed in the text. Please correct these data in the Work Plan requested below and future plans and reports. These soil vapor sampling results indicate that potential vapor intrusion concerns exist in the area of the former second generation USTs and the northern dispenser. No soil vapor data are available from the area of the first generation USTs and former dispensers to evaluate potential vapor intrusion concerns in that area.

2. **Soil Excavation.** ACEH concurs with the recommendation to excavate and remove soil in the area of the first and second generation USTs and the northern second generation dispenser island prior to redevelopment of the site. Please provide plans to conduct this excavation in the Work Plan requested below. The Work Plan should also include plans to screen shallow soil and identify contamination during grading of the site for development. These plans are to identify all areas of the site that will be excavated or graded, describe the protocol and criteria for observing and screening soils during site development, and the procedures that will be implemented if contaminated soil is identified.
3. **Laboratory Report for Water Samples.** Laboratory results for several water samples were not included on Table 3 or Appendix C. A review of the electronic data submittal on Geotracker indicates that 1,2-dichloroethane was detected in several groundwater samples at concentrations up to 67 $\mu\text{g}/\text{L}$ (CPT-1); however, these data are not presented in the report. The Maximum Contaminant Level for 1,2-dichloroethane is 0.5 $\mu\text{g}/\text{L}$. Please include the results for 1,2-dichloroethane and other detected analytes in tabular form in the Work Plan requested below and future plans and reports for the site.
4. **Extent of Groundwater Contamination.** Please present conclusions and recommendations for future actions regarding groundwater contamination in the Work Plan requested below. In addition, please describe whether these activities are to be conducted prior to or following development of the site for residential use.
5. **Adjacent Site and Development Plans.** Plans for residential development have been broadly discussed during meetings regarding 3884 First Street and the plans are briefly mentioned in this report; however, no development plans have been submitted to this office. Please note that a fuel leak investigation was conducted for three former USTs at 3800 First Street in Livermore. The fuel leak case for 3800 First Street received regulatory closure on June 14, 1995. The closure included the condition that the corrective action is to be reviewed if land use changes (Please see attached Remedial Action Completion Certificate). Therefore, if a land use change to residential is planned for the former fuel leak site at 3800 First Street, the responsible parties for 3800 First Street are to review the former fuel leak case and submit to this office an evaluation to indicate that the levels of residual contamination are acceptable for the proposed land use change.

TECHNICAL REPORT REQUEST

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

- **January 15, 2006 – Work Plan**

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).

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

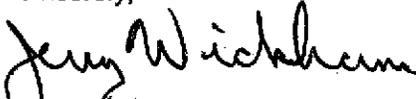
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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, P.G.
Hazardous Materials Specialist

Attachment: Remedial Action Completion Certificate – 3800 First Street, Livermore, CA

Enclosure: ACEH Electronic Report Upload (ftp) instructions

cc: Robert Foss, Cambria Environmental Technology, Inc., 5900 Hollis Street, Suite A
Emeryville, CA 94608

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 9456

Stephen Cloudsley, Real Estate Consulting, 1561 Ramona Way, Alamo, CA 94507

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT
8-30-05

ENVIRONMENTAL HEALTH SERVICES
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August 29, 2005

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Mary Harvey
Hexcel Corporation
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Livermore, CA 94550

Bruce Qvale
First Street LLC
3800 First Street
Livermore, CA 94550

Subject: Fuel Leak Case No. RO0002611, Livermore Honda, 3884 First Street, Livermore, CA –
Work Plan Approval

Dear Mr. Inglis, Mr. Qvale, and Ms. Harvey:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site and the documents entitled, "Additional Investigation Workplan," dated August 5, 2005, and "Additional Investigation Work Plan Addendum," dated August 15, 2005, prepared on behalf of Chevron Environmental Management Company by Cambria Environmental Technology, Inc. These documents present plans to characterize the extent of soil, soil vapor, and groundwater contamination at the above-referenced site as requested by ACEH in correspondence dated June 23, 2005. ACEH generally concurs with the proposed scope of work provided that the technical comments below are addressed.

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. Soil Samples.** The Work Plan indicates that soil samples will be collected at depths to be determined in the field based on several factors including previous sampling results and CPT data. We request that soil samples be collected at all significant changes in soil type and at depths where elevated concentrations of petroleum hydrocarbons were observed in adjacent borings. If significant changes in soil type are not noted or elevated concentrations of petroleum hydrocarbons were not observed in adjacent borings, then soil samples are to be collected at minimum intervals of every 5 feet within the upper 30 feet and every 10 feet beyond 30 feet below ground surface (bgs).
- 2. Shallow Soil Samples.** The use of air knife excavation within the upper 8 feet for borehole clearance will affect data quality due to stripping of volatile components during advancement of the air knife boreholes. Analytical results for all soil samples that are collected from

shallow intervals affected by air knife excavation must be clearly marked in subsequent investigation reports as "disturbed." Please note the requirement in comment 5 below regarding borings for soil vapor sampling.

3. **Boring Locations.** It is not clear why many of the proposed boring locations are located north of potential source areas. Since depth-discrete groundwater samples will be collected from the borings, it would be advantageous to locate more borings in locations that are downgradient from suspected source areas. The anticipated groundwater flow direction for the site is to the south southeast. Therefore, we request the following additions or revisions to the boring locations:
 - Please add one boring location south southeast of boring B-1 or move the proposed boring location north of existing boring B-14 to a location south southeast of boring B-1.
 - Please move the proposed boring location northeast of existing boring B-18 to a location south southeast of boring B-18.
 - Please move one of the proposed boring locations in the street near the intersection of Portola Avenue and First Street to a location south southeast of existing boring B-13.
4. **Boring Depths.** The soil borings are to be advanced to depths sufficient to sample water-bearing zones below the "perched" zone.
5. **Soil Vapor Sampling.** The Work Plan indicates that soil vapor samples will be collected at specific depths to be determined based on several factors. ACEH requests that soil vapor samples be collected from permeable subsurface zones and at depths where elevated concentrations of petroleum hydrocarbons were detected in adjacent borings. Within each of the proposed borings for soil vapor sampling, ACEH requests that one soil vapor sample be collected within 8 feet bgs. In order to collect soil vapor samples within the upper 8 feet bgs, the borings are to be cleared by hand augering or other means that do not strip volatile components from the soil. In addition to the five proposed soil vapor sampling locations, ACEH requests that soil vapor samples be collected from the proposed location south southeast of boring B-1 (see comment 3).
6. **Analyses for Total Lead.** Please include laboratory analyses for total lead using EPA Method 7421 for all soil samples.

TECHNICAL REPORT REQUEST

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

- **November 30, 2005** - 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).

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.

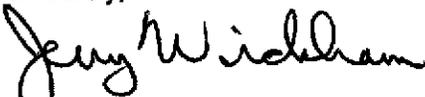
AGENCY OVERSIGHT

J. Mark Inglis, Bruce Qvale, and Mary Harvey
August 29, 2005
Page 4

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If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Robert Foss
Cambria Environmental Technology, Inc.
5900 Hollis Street, Suite A
Emeryville, CA 94608

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

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June 23, 2005

J. Mark Inglis
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6001 Bollinger Canyon Rd., K2256
P.O. Box 6012
San Ramon, CA 94583-2324

Subject: Fuel Leak Case No. RO0002611, Livermore Honda, 3884 First Street, Livermore, CA – Request for Work Plan

Dear Mr. Inglis:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site and the report entitled, "Subsurface Investigation Report," received May 23, 2005, prepared on behalf of Chevron Environmental Management Company by Cambria Environmental Technology, Inc. The objective of the subsurface investigation was to define the horizontal and vertical extent and characteristics of hydrocarbons in soil and groundwater beneath the site as requested by ACEH in correspondence to Mr. Bruce Qvale of First Street LLC dated June 10, 2004.

According to records presented to ACEH, the site was formerly used as a gasoline service station. Chevron, doing business as Standard Oil Company, leased the property from approximately 1936 up through 1973 or as late as 1975. The site has apparently functioned as part of a car dealership since 1979 and is currently a used car lot.

Petroleum hydrocarbons have been detected in soil and groundwater beneath the locations of former Standard Oil (Chevron) service station USTs and dispensers, which is consistent with releases from the former service station operations. As former tank owner and operator for the site, Chevron Products Company has been designated the primary or active Responsible Party. A Notice of Responsibility dated June 24, 2005 has been sent by certified mail under separate cover. Coast Manufacturing & Supply, Inc. was a property owner and leased the site to Chevron during operation of the service station. Therefore, Hexcel Corporation, which is the corporate successor to Coast Manufacturing & Supply, Inc., has also been designated a Responsible Party. The current land owner, First Street LLC, is the third Responsible Party for the site.

Based on the soil and groundwater contamination detected at the site, further investigation is required. **We request that you prepare and submit a work plan for the soil and groundwater investigation by August 24, 2005.** Based on ACEH staff review of the document referenced above, we request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

- 1. Shallow Soil Samples.** ACEH is concerned that the analytical results for soil samples collected at depths less than 8 feet in air knife excavations may be biased due to stripping of volatile components during advancement of the air knife boreholes. Please describe in the Work Plan requested below, the methods that will be used for future soil sampling in boreholes to assure that volatile components in the soil are not stripped off prior to sample collection by the high pressure air and vacuum generated by the air knife.
- 2. Shallow Soil Characterization and Potential Site Redevelopment.** At most UST sites, observations are available on the conditions of the tanks and piping at the time of removal. In addition, observations and analytical data are typically available regarding the extent of contamination within the tank and piping excavations. These observations and sampling results provide valuable information to direct subsequent soil and groundwater investigations. Please research and confirm that no information is available regarding removal of the USTs and piping.

To date, soil samples have been collected from 24 soil borings at this site. Additional investigation of the shallow soils will be required based on the sampling results collected to date, the concerns outlined in comment 1 above, and the absence of any information on the USTs, piping, and shallow soil conditions at the time of UST and piping removal.

The report recommends limited excavation in the area of boring B-20 prior to or during redevelopment of the site. The report also suggests working with the developers of the site to mitigate any impacts to the development and final land use. ACEH encourages Chevron to work with the developer of the property to address shallow soil contamination. If the site is to be developed prior to site closure, the Responsible Parties must provide a plan to complete site characterization and to identify potential human health risks posed by soil and groundwater contamination at the site prior to or during development. Excavation within the site prior to site closure will require a plan for soil management and confirmation sampling during excavation. Please incorporate any plans for excavation during development in the Work Plan as appropriate. Plans for shallow soil characterization are to be included in the Work Plan requested below.

- 3. Site Characterization.** The lateral and vertical extent of soil and groundwater contamination at the site is undefined. Detailed lithologic information is to be collected using soil borings, direct push sampling, and/or cone penetrometer. Groundwater monitoring wells will be required in the zone where groundwater was first encountered and in the deeper regional groundwater zone. Please consider the use of depth discrete groundwater samples collected along transects to characterize the site prior to installation of monitoring wells. We request that you use detailed hydrogeologic cross sections to determine the appropriate locations and designs for monitoring wells/well clusters and piezometers that are needed to appropriately characterize the three-dimensional extent of soil and groundwater contamination at the site. The zone where groundwater was first encountered in soil borings, typically at depths of 23.5 to 28 feet bgs, is described as a discontinuous perched zone. The Work Plan is to include plans to characterize chemical concentrations in groundwater within the perched zone and to assess the continuity of the perched zone and across the site. To appropriately evaluate your site, your monitoring wells/well clusters will need to be screened in the permeable zones with

screen lengths that match the stratigraphic sequence. Please include the above information in the Work Plan requested below.

4. **Additional Boring in First Street.** The planned boring to investigate the location of a former fuel dispenser in First Street was not completed due to permitting issues. This boring is to be completed during the next phase of field investigation.
5. **Preferential Pathways and Well Survey.** Please evaluate whether any potential preferential pathways may exist at the site. The preferential pathway study shall include a well survey of all wells (monitoring and production wells: active, inactive, standby, decommissioned (sealed with concrete), abandoned (improperly decommissioned or lost); and dewatering, drainage, and cathodic protection wells) within a 1/2-mile radius of the subject site. Please review historical maps such as Sanborn maps, aerial photos, etc., when performing the background study. Submittal of map(s) showing the location of all wells identified in your study, and the use of tables to report the data collected as part of your survey are required. Include appropriate prints of historic aerial photos used as part of your study. We also request that you list by date all aerial photographs available for the site from the aerial survey company or library you use during your study. Refer to the Regional Board's guidance for identification, location, and evaluation of potential deep well conduits when conducting your preferential pathway study. Please identify any sensitive receptors near the site. The evaluation of preferential pathways and well survey are to be included in the Work Plan requested below.
6. **Regional Geologic and Hydrogeologic Setting.** We request that you provide information on the regional geologic and hydrogeologic setting of your site by reviewing the available technical literature for the area. Background information for your review includes but is not limited to regional geologic maps, United States Geological Survey (USGS) technical reports and documents, Department of Water Resources (DWR) Bulletins, Regional Water Quality Control Board reports on the groundwater basin, data from contaminant investigations in the area, etc.

Provide a narrative discussion of the regional geologic and hydrogeologic setting obtained from your background study. Use photocopies of regional geologic maps, groundwater contours, cross-sections, etc., to illustrate your results and include a list of technical references you reviewed. Report your results in the Work Plan requested below

TECHNICAL REPORT REQUEST

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

- **August 24, 2005 - Work Plan for Soil and Groundwater Investigation**
- **90 days after ACEH approval of Work Plan – 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.

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

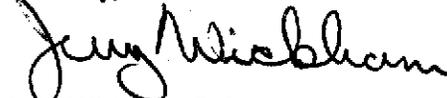
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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, P.G.
Hazardous Materials Specialist

J. Mark Inglis
June 23, 2005
Page 5

cc: Bruce Qvale
First Street LLC
3800 First Street
Livermore, CA 94550

Mary Harvey
Hexcel Corporation
75 N. Mines Road
Livermore, CA 94550

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



sent 03-08-05

March 8, 2005

Bruce H. Qvale
First Street LLC
3800 1st St.
Livermore, CA 94551

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

Subject: Fuel Leak Case No. RO0002611, Livermore Honda 3884 1st St., Livermore, California – Workplan Approval

Dear Mr. Qvale:

Alameda County Environmental Health (ACEH) has reviewed the February 18, 2005 *Addendum to Additional Investigation Workplan* submitted by ChevronTexaco on your behalf for the above-referenced site. We concur with your workplan provided the following conditions are met:

1. Soil borings in the vicinity of the 1999 borings B-1 through B-3 and the former USTs (first and second generation) will be advanced to 25 ft bgs, and borings near the former dispenser islands will be advanced to 15 ft bgs. If groundwater is encountered within the borings, a sufficient number of groundwater samples will be collected and analyzed to both 1) evaluate the potential for significant impact to groundwater to have occurred, and 2) to provide initial characterization of the onsite lateral distribution of petroleum hydrocarbons in groundwater. If groundwater is not encountered in borings advanced to the depths described above, a sufficient number of borings (approximately 3 to 5) will be advanced to groundwater to achieve the investigation goals listed above. In general, based on the conceptual site model presented in Cambria's September 21, 2004 workplan, a groundwater sample needs to be collected within 10 ft downgradient of the area of borings B-1 through B-3, any former leaking USTs or other locations of significant release at this site.
2. At least one soil sample and one groundwater sample from the area assessed by borings B-1 through B-3 and from each former UST system will be analyzed for 1,2-DCA, EDB and MTBE. The samples exhibiting the highest indication of TPH presence, for each of the 3 areas, will be analyzed for these VOCs. If these VOCs are detected, their distribution in both soil and groundwater will need to be defined. Accordingly, we recommend that you either analyze initial soil and groundwater samples on an expedited basis so that additional samples may be placed on hold then analyzed as necessary, or that you analyze a sufficient number of samples to provide initial contaminant delineation for the full suite of analytes.
3. 72-hr advance written notification (email preferred) will be provided to ACEH prior to field sampling activities.

REPORT REQUEST

Please submit your *Soil and Water Investigation Report*, which addresses the comments above by **June 8 2005**. ACEH makes this request pursuant to California Health & Safety Code Section 25296.10, 23 CCR Sections 2652 through 2654, and 2721 through 2778 outline the responsibilities of a responsible party for an unauthorized release from an UST system, and require your compliance with this request.

Professional Certification and Conclusions/Recommendations

The California Business and Professions Code (Sections 6735 and 7835.1) requires that workplans 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.

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.

UNDERGROUND STORAGE TANK CLEANUP FUND

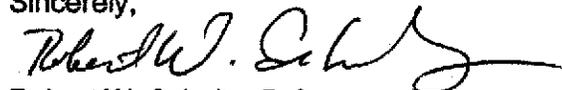
Please note that delays in investigation, late reports or enforcement actions by ACEH may result in you becoming ineligible to receive cleanup cost reimbursement from the state's Underground Storage Tank Cleanup Fund (senate Bill 2004).

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 County District Attorney or other appropriate agency, for enforcement. California Health and Safety Code, Section 25299.76 authorizes ACEH enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

Please call me at (510) 567-6719 with any questions regarding this case.

Sincerely,



Robert W. Schultz, P.G.
Hazardous Materials Specialist

cc: Mark Inglis, ChevronTexaco, P.O. Box 6012 San Ramon, CA 94583-2324
Sandi Nichols, Stoel Rives, LLP, 111 Sutter St., Ste. 700, San Francisco, CA 94104
Bob Foss, Cambria Environmental Technology, Inc., 5900 Hollis St., Ste. A, Emeryville, CA 94608
Susan Gallardo, Geomatrix Consultants, Inc., 2101 Webster St., 12th Floor, Oakland, CA 94612
Matt Katen, Zone 7 Water District, QIC 80201
Donna Drogos, ACEH
Robert Schultz, ACEH

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SCVT
11-17-04

November 15, 2004

Bruce H. Qvale
First Street LLC
3800 1st St.
Livermore, CA 94551

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

Subject: Fuel Leak Case No. RO0002611, Livermore Honda 3884 1st St., Livermore, California – Request for Workplan Modification

Dear Mr. Qvale:

Alameda County Environmental Health (ACEH) has reviewed the September 21, 2004 *Additional Investigation Workplan* and the October 7, 2004 *Area Survey Results* submitted by ChevronTexaco on your behalf for the above-referenced site. We request that you modify your workplan to address the following comments and submit the requested report following the schedule below.

TECHNICAL COMMENTS

1) Locations of Previous Investigation Borings

In order to evaluate the appropriateness of further investigating the contamination at locations B-2 and B-3 by laterally surrounding these points with borings, we need to know how accurately the December 1999 boring locations (B-1 through B-6) can be field located. In their February 18, 2004 letter, Geomatrix recommended no further action for this site and presented data suggesting that borings B-1 through B-6 were intended to be located near the former UST systems. Figure 2 in Cambria's workplan suggests that none of the December 1999 borings were within 20 ft of any former UST system component. In the workplan addendum requested below, please state the methods for projecting locations B-1 through B-6 onto a composite map of historical site features. Please state whether or not, and to what degree, 1) the historical aerial photographs, 2) Figure 2 from the December 1999 *Preliminary Subsurface Investigation Report*, and 3) any remnant historical site features may be correlated.

2) Rationale For Sampling Strategy

In the workplan addendum requested below, please state the rationale for selecting the sampling methods and location(s) for each boring or set of borings. We request that the rationale relate the proposed sampling strategy to the investigation objectives, and that you identify whether or not any data gaps are likely to remain following execution of the proposed work. This request is made in the interest of minimizing the number of iterations of field work performed at leaking UST sites, and to thereby reduce both the time period and costs for a case to progress to closure.

3) Groundwater Evaluation

No consideration of the potential impacts to groundwater was provided in Cambria's workplan. We request that you perform a study of the regional geology and hydrogeology to determine the likely current and historical depth to groundwater and the likely current and historical

groundwater flow direction(s). Please report the results of your regional study and propose a groundwater sampling plan in the workplan addendum requested below.

4) Soil Sampling Locations

Cambria's site plan suggests that a fuel dispenser was formerly located within 1st Street. Accordingly, sampling needs to be performed at the location of this former UST system component. Please revise your sampling plan in the workplan addendum requested below.

5) Chemical Analyses

Pursuant to Health and Safety Code Section 25296.15(a)(1) we require that samples be analyzed for MTBE, in addition to the analytes proposed by Cambria. Please revise your analysis plan in the workplan requested below.

6) Well Survey

We require that you provide location addresses and copies of DWR driller's reports for all wells identified in your survey. Please revise your well survey and include it in the workplan addendum requested below.

7) Quarterly Status Reporting

Pursuant to 23 CCR section 2652(d), you are required to submit quarterly reports which include an update of the information required in section 2652(c), including current UST and property owner/operator contact information and the results of all investigation, monitoring or other corrective actions which have occurred during the reporting period. Updates are required every three months regardless of groundwater sampling frequency. Please submit your quarterly reports following the schedule specified below.

TECHNICAL REPORT REQUESTS

Please submit reports to ACEH according to the following schedule:

- December 31, 2004 – Workplan Addendum
- 90 days after Workplan Approval – Soil and Water Investigation Report
- End of First Month of Each Quarter - Quarterly Report updating all information required by 23 CCR 2652(c) and covering the previous quarter's corrective action

ACEH makes this request pursuant to California Health & Safety Code Section 25296.10. CCR Title 23 Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to a reportable unauthorized release from a petroleum UST system, and require your compliance with this request.

Perjury Statement

All workplans and technical reports submitted to ACEH must be accompanied by a cover letter from the responsible party that states the following: "I declare under penalty of perjury, that the information and/or recommendations contained in the attached proposal 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.

Professional Certification

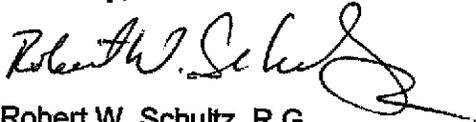
The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that workplans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. Please note that 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. Work at your site is required to be designed, interpreted, and overseen by the appropriately registered professional.

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 County District Attorney or other appropriate agency, for enforcement. California Health and Safety Code, Section 25299.76 authorizes ACEH enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

Please call me at (510) 567-6719 with any questions regarding this case.

Sincerely,



Robert W. Schultz, R.G.
Hazardous Materials Specialist

cc: Karen Streich, ChevronTexaco, P.O. Box 6012 San Ramon, CA 94583-2324
Sandi Nichols, Stoel Rives, LLP, 111 Sutter St., Ste. 700, San Francisco, CA 94104
Bob Foss, Cambria Environmental Technology, Inc., 5900 Hollis St., Ste. A, Emeryville, CA 94608
Susan Gallardo, Geomatrix Consultants, Inc., 2101 Webster St., 12th Floor, Oakland, CA 94612
Matt Katen, Zone 7 Water District, QIC 80201
Donna Drogos, ACEH
Robert Schultz, ACEH

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
6-14-04

June 10, 2004

Mr. Bruce H. Qvale
First Street LLC
3800 1st St.
Livermore, CA 94551

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

Subject: Fuel Leak Case No. RO2611
Livermore Honda
3884 1st St.
Livermore, California

Dear Mr. Qvale:

Alameda County Environmental Health (ACEH) staff have reviewed your February 18, 2004 *Request for Agency Consultation* (and the reports enclosed therewith) for the above-referenced site. Geomatrix Consultants, Inc. (Geomatrix) prepared the request on your behalf and stated that the site should qualify for "a no further action status under a low risk soil scenario." In addition and at your request, ACEH staff met with Geomatrix and representatives of First Street LLC on May 6, 2004, and reviewed the following documents:

- Geomatrix's *Summary of Site Information* submitted on May 6, 2004;
- Chain of title and lease agreement documents submitted electronically on May 11 and 12, 2004; and
- Historical aerial photographs of the site for the years 1957, 1959, 1966, 1973, 1978, 1980, 1984 submitted by Geomatrix on May 24, 2004.

ACEH has listed this case in our database of fuel leak sites, and sent Notice of Responsibility to First Street LLC. Please review the following technical comments and submit the requested report following the schedule below.

BACKGROUND INFORMATION

The site overlies a sensitive drinking water aquifer. No active, permitted drinking water wells have been located within 1/4-mile of the site; however, there is existing beneficial use of the underlying Livermore Valley groundwater basin (DWR No. 2-10) and the potential presence of improperly abandoned wells and other vertical conduits has not been evaluated. Currently the site is paved and is used as a car sales lot. The property is in the midst of a transaction, and redevelopment including a change of site use may be contemplated.

According to the documents submitted to ACEH, Coast Manufacturing & Supply Company purchased the site in 1917, and leased the property to Standard Oil Company in 1945 and again in 1965. Wells Fargo Bank purchased the site in 1967. The aerial photographs provided by Geomatrix suggest that an automotive service station was operated at the site between at least 1957 and 1969. The 1973 photograph submitted by Geomatrix shows an apparent change in the site development configuration. Based on City of Livermore records, Geomatrix states that Standard Oil occupied the site from 1967 until at least 1975.

To evaluate the potential presence of subsurface UST system components and to evaluate the associated environmental concern, Tom Edwards & Associates (TEA) performed a subsurface investigation of the site in December 1999. TEA's investigation included a geophysical survey to identify possible UST, former UST pit, and subsurface piping locations. Based on the geophysical survey results, TEA drilled six soil borings to 20 ft bgs at the site and analyzed soil samples for petroleum hydrocarbons. Results from this work detected up to 40,000 mg/kg TRPH, 39,000 TPHmo, 280 mg/kg TPHg, 0.03 mg/kg benzene, 0.62 mg/kg toluene, 0.62 mg/kg ethylbenzene, and 6.8 mg/kg xylenes in site soil. Geomatrix states that the petroleum impacted soil is limited vertically. According to TEA's December 1999 *Preliminary Subsurface Investigation Report*, the geophysical survey identified six possible UST or former UST pit locations and an associated 20-ft long piping run. The December 1999 investigation included four borings in potential former or current UST locations and one boring in a potential 20-ft long piping run location. No USTs or piping were encountered during drilling.

RESPONSE TO RP DESIGNATION REQUEST

Geomatrix has requested that Alameda County name Standard Oil as a responsible party for the identified contamination. ACEH staff have considered this request and have the following concerns:

- No documentation has been provided indicating the location of the detected subsurface contamination in relation to the former site UST system or other features of the former service station. A map of the geophysical survey results with superimposed sampling locations was not submitted. Furthermore, the data presented to the County indicates that the highest soil impact is at 5 ft bgs in boring B-2 and that concentrations decrease with depth. This concentration pattern is not consistent with typical UST releases where concentrations are typically highest beneath the USTs (at least 8 ft bgs).
- The Preliminary ESA performed in 1999 did not rule out other potential sources of petroleum hydrocarbons that could have contributed to or been the source of the impacts detected in site soil. In particular, the Golder 1999 report states, "The nature of operations conducted by Coast Manufacturing and Supply Company on the subject property is unknown." Also the 1973 aerial photograph appears to suggest redevelopment of the service station prior to paving and use as a car sales lot.

Accordingly, there is insufficient information at this time for ACEH to name Standard Oil Company (currently ChevronTexaco) as a responsible party for the site. Please note that this finding also requires that ACEH reconsider placement of the case in the Local Oversight Program (LOP). ACEH will notify you once we have transferred your case to our Toxics Program.

TECHNICAL COMMENTS

Site Characterization

In order to consider a site for case closure under a low risk soil scenario, ACEH requires that soil contamination be defined. At your site, the source of petroleum hydrocarbons needs to be identified, the vertical and horizontal extent of petroleum hydrocarbons need to be defined, and the potential for the site to impact groundwater needs to be evaluated. If you conclude that the former service station was the source of the reported petroleum hydrocarbons, all areas of the site susceptible to impact from the various components of the former UST system should be addressed (including former UST, piping and dispenser locations). Please include your site

conceptual model as background information supporting your proposed scope of work. Please submit a Work Plan describing your proposed investigation by the date specified below.

Well Survey

ACEH requests that you locate all wells (monitoring and production wells: active, inactive, standby, decommissioned, abandoned and dewatering, drainage and cathodic protection wells) within a 1/4-mile radius of the subject site. Submittal of map(s) showing the location of all wells identified in your study, and the use of tables to report the data collected as part of your survey are required. We recommend that you obtain well information from both Zone 7 Water Agency and the State of California Department of Water Resources, at a minimum. Please include an analysis and interpretation of your findings, and report your results in the work plan requested below.

Professional Certification and Cover Letters

Please note that 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. In addition, all work plans and technical reports submitted to this office must be accompanied by a cover letter from the responsible party that states the following: "I declare under penalty of perjury, that the information and/or recommendations contained in the attached proposal 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.

REPORT SUBMITTAL

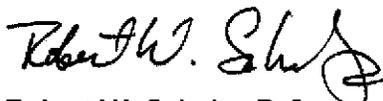
We request that you submit a **Work Plan** for additional subsurface investigation by **July 21, 2004**. ACEH requests this report pursuant to the Regional Water Quality Control Board's authority under Section 13267 of the California Water Code.

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 County District Attorney or other appropriate agency, for enforcement. Enforcement may include administrative action or monetary penalties of up to \$10,000 per day for each day of violation of the California Health and Safety Code, Division 20, Chapter 6.75.

Please call me at (510) 567-6719 with any questions regarding this case.

Sincerely,



Robert W. Schultz, R.G.
Hazardous Materials Specialist

Cc: Sandi Nichols, Stoel Rives, LLP, 111 Sutter St., Ste. 700, San Francisco, CA 94104
Susan Gallardo, Geomatrix Consultants, Inc., 2101 Webster St., 12th Floor, Oakland, CA 94612
Matt Katen, Zone 7 Water District, 5997 Parkside Drive, Pleasanton, CA 94588
Karen Streich, ChevronTexaco, P.O. Box 6012 San Ramon, CA 94583-2324

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

April 1, 2004
RO0002611

Mr. Don Endo
First Street LLC
3800 1st St.
Livermore, CA 94551

RE: Livermore Honda, 3800 1st Street, Livermore, California 94551

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Endo:

This letter is to inform you of new legislative requirements pertaining to cleanup and closure of sites where an unauthorized release of hazardous substance, including petroleum, has occurred from an underground storage tank (UST). Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code requires the primary or active responsible party to notify all current record owners of fee title to the site of: 1) a site cleanup proposal, 2) a site closure proposal, 3) a local agency intention to make a determination that no further action is required, and 4) a local agency intention to issue a closure letter. Section 25297.15(b) requires the local agency to take all reasonable steps to accommodate responsible landowners' participation in the cleanup or site closure process and to consider their input and recommendations.

For purposes of implementing these sections, First Street LLC, c/o yourself, has been identified as the primary or active responsible party. Please provide to this agency, within twenty (20) calendar days of receipt of this notice, a complete mailing list of all current record owners of fee title to the site. You may use the enclosed "list of landowners" form (sample letter 2) as a template to comply with this requirement. If the list of current record owners of fee title to the site changes, you must notify the local agency of the change within 20 calendar days from when you are notified of the change. In addition, our office is considering your request for site closure. Please also complete and submit a "notice of proposed action submitted to local agency" form. You may use sample letter 3, enclosed.

If you are the sole landowner, please indicate that on the landowner list form. The following notice requirements do not apply to responsible parties who are the sole landowner for the site.

LANDOWNER NOTIFICATION

Re: 3800 1st Street, Livermore, CA 94551

April 1, 2004

Page 2 of 2

In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 1) consider a cleanup proposal (corrective action plan)
- 2) consider a site closure proposal
- 3) make a determination that no further action is required
- 4) issue a closure letter

You may use the enclosed "notice of proposed action" form (sample letter 3) as a template to comply with this requirement. Before approving a cleanup proposal or site closure proposal, determining that no further action is required, or issuing a closure letter, the local agency will take all reasonable steps necessary to accommodate responsible landowner participation in the cleanup and site closure process and will consider all input and recommendations from any responsible landowner.

Please call me at (510) 567-6721 should you have any questions about the content of this letter.

Sincerely,



Donna Drogos
Supervising Hazardous Materials Specialist

Attachments

cc: Betty Graham, RWQCB

SAMPLE LETTER (2): LIST OF LANDOWNERS FORM

Name of local agency
Street address
City

SUBJECT: CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR (*Site Name and Address*)

(Note: Fill out item 1 if there are multiple site landowners. If you are the sole site landowner, skip item 1 and fill out item 2.)

1. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (*name of primary responsible party*), certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site:

2. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (*name of primary responsible party*), certify that I am the sole landowner for the above site.

Sincerely,

Signature of primary responsible party

Name of primary responsible party

SAMPLE LETTER 3: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY

Name of local agency
Street address
City

SUBJECT: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY FOR *(Site Name and Address)*

In accordance with section 25297,15(a) of Chapter 6.7 of the Health & Safety Code, I, *(name of primary responsible party)*, certify that I have notified all responsible landowners of the enclosed proposed action. Check space for applicable proposed action(s):

- cleanup proposal (corrective action plan)
- site closure proposal
- local agency intention to make a determination that no further action is required
- local agency intention to issue a closure letter

Sincerely,

Signature of primary responsible party

Name of primary responsible party

cc: Names and addresses of all record fee title owners

ALAMEDA COUNTY
HEALTH CARE SERVICES

DAVID J. KEARS AGENCY
~~XXXXXXXXXXXX~~ Agency Director



470-27th Street, Third Floor
Oakland, California 94612
(415) 874-7237

August 20, 1987

Ms. Terri H. Hughes, Environmental Coordinator
Hexcel
11711 Dublin Blvd.
P.O. Box 2312
Dublin, CA 94568-0705

Dear Ms. Hughes:

We have received your letter dated August 3, 1987, clarifying your sampling location and analysis. Since the trivalent chrome in the soil around the acid wash tank is below the TTLC and STLC, this tank may be closed.

Please submit to our office, your closure plan in accordance to Title 23, California Administrative Code, for approval.

If you have any questions, please contact Larry Seto, Hazardous Materials Specialist, at 874-7237.

Sincerely,

Rafat A. Shahid, Chief,
Hazardous Materials Division

RAS:mnc

cc: Lester Feldman, RWQCB
Dwight Hoenig, DOHS