

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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April 16, 2007

Mr. Gerry Ploof
The Olson Company
3130 Crow Canyon Place, Suite 210
San Ramon, CA 94583

Ms. Carol Wallace
Christopher and Carol P. Wallace Trust
509 Ironwood Road
Alameda, CA 94502

Subject: Fuel Leak Case No. RO0002737, Impulse Motors, 1210 Bockman Road, San Lorenzo, CA – Work Plan Approval

Dear Mr. Ploof and Ms. Wallace:

Alameda County Environmental Health (ACEH) staff has reviewed the case file and the documents entitled, "Work Plan for Soil and Groundwater Investigation," dated March 12, 2007 and prepared on your behalf by Secor International Inc (Secor). The scope of work as described in the work plan discusses the installation of four soil borings with soil and groundwater sampling, abandonment or two historic groundwater monitoring wells and soil vapor sampling to evaluate the potential risk associated with the vapor intrusion pathway.

ACEH generally concurs with the scope of work as recommended in the work plan provided the technical comments discussed below are incorporated during the work plan implementation. Based on ACEH staff review of the documents referenced above, 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 <mailto:steven.plunkett@acgov.org>) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Site Boring Locations and Soil Sampling.** Secor recommends the installation of four soil borings near the former underground storage tanks (USTs) and fuel dispenser island. The proposed soil boring locations are acceptable. However, ACEH requests that three additional soil boring be installed at the following locations: one soil boring shall be installed at the southern limit of the former UST tank pit, one soil boring shall be installed between the limit of the southern fuel dispenser excavation and the eastern limit of the former tank pit excavation. Lastly, one soil boring shall be installed adjacent to the northern fuel dispenser excavation and slightly west of the onsite power pole.

In addition, ACEH request that soil samples be collected as follows; any interval where staining, odor, or elevated organic vapor meter (OVM) readings occur, at the capillary fringe, where groundwater is first encountered and at distinct changes in lithology. If no changes in lithology or elevated OVM readings occur then soil samples are to be collected at five feet

intervals until groundwater is encountered, at the capillary fringe and at the total depth of the soil boring or at least 20 feet bgs. ACEH agrees with the soil sampling analysis as proposed by Secor, with the addition of EDB and EDC. Please present the results from the SWI in the report requested below.

2. **Hydropunch Groundwater Sampling.** After a soil sample has been collected at the soil/ groundwater interface, a depth discrete groundwater sample shall be collected from the boring by the method described in the Work Plan. ACEH agrees with the water quality analysis as recommended in the work plan, with the addition of EDB and EDC. Results from groundwater sampling are to be presented in the SWI report requested below.
3. **Soil Gas Investigation and Soil Vapor Sampling.** ACEH generally agrees with the recommendation for soil vapor sampling as proposed by Secor. However, there is no mention of soil gas sample analysis in the work plan. Therefore, ACEH requests that EPA method TO-15 be used for soil vapor sample analysis. Please present the results of the soil gas sampling in the SWI report requested below.
4. **Monitoring Well Abandonment.** ACEH agrees with well abandonment by pressure grouting as proposed by Secor.

TECHNICAL REPORT REQUEST

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

- May 30, 2007 – Soil, Groundwater and Soil Vapor 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

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present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

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

AGENCY OVERSIGHT

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

If you have any questions, please call me at (510) 383-1767.

Sincerely,



Steven Plunkett
Hazardous Materials Specialist

cc: Kyle Emerson
Secor International
25684-F Business Center Drive
Redlands, CA 92374

Jason Adelaars
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Donna Drogos, ACEH
Steven Plunkett, ACEH
File