

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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October 12, 2007

Mr. Nick Garcia  
Olson Company/In Town Communities LLC  
3130 Crow Canyon Place, Suite 210  
San Ramon, CA 94583-4631

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

Subject: Fuel Leak Case No. RO0002737 (Global ID #T06019771179), Impulse Motors, 1210 Bockman Road, San Lorenzo, CA

Dear Mr. Garcia and Ms. Wallace:

Alameda County Environmental Health (ACEH) staff has reviewed the case file and the document entitled, "Work Plan for Monitoring Well Installation" dated October 2, 2007 and prepared by Secor International. The Work Plan recommends that installation of three groundwater monitoring wells located downgradient of the former UST tank pit and dispenser island. ACEH generally concurs with the proposed monitoring well design, soil, and groundwater sampling recommended in the work plan.

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. This report is being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code. Please provide 72-hour advance written notification to this office prior to the start of field activities (e-mail preferred to [mail to: steven.plunkett@acgov.org](mailto:steven.plunkett@acgov.org)).

#### TECHNICAL COMMENTS

1. **Monitoring Well Design and Well Location.** ACEH agrees with the proposed monitoring well design as recommended by Secor. However, we request that the total depth of the monitoring wells must be 20 feet, because during the previous investigation soil sampling was only completed to a depth of 8 feet bgs. The previous soil and groundwater investigation completed in April 2006 detected elevated levels of dissolver phase TPHg and TPHd in soil boring BA-01, immediately downgradient of the former fuel dispensers at concentrations of up to 2,100 ppb and 110,000 ppb, respectively.

Currently, the two proposed monitoring wells adjacent to Bockman Road are approximately 40 feet west and 85 feet west of soil boring BA-01. Please adjust to location of the monitoring wells closer to soil boring BA-01. Additionally, ACEH requests that one additional monitoring well must be installed approximately 20 feet northwest of soil boring BA-01. Please revise the site plan with monitoring well locations (Figure 1) to accurately reflect the updated location of

the monitoring wells adjacent to Bockman Road. Please submit the revised Figure 1 prior to the installation of the monitoring wells. Please present results from the monitoring well installation in the report requested below.

2. **Soil Sampling and Analysis.** ACEH requests that soil samples are to be collected at any interval where staining, odor or elevated PID readings are observed. Additional soil samples are to be collected at the capillary fringe, changes in lithology and at the total depth of the boring. During the April 2007 soil and groundwater investigation, no soil samples were collected from below 8 feet bgs. Therefore, in order to determine the vertical extent of contamination in soil, samples are to be collected from the total depth of the borings, at 20 feet below ground surface. Please present the results for soil sampling in the report requested below.
3. **Groundwater Sampling.** ACEH agrees with the proposed groundwater sampling analysis as recommended by Secor. Results from groundwater sampling shall be presented in the report requested below.
4. **Geotracker Submissions.** During our customary review of the State Water Resources Control Board Geotracker website, we have found that the requisite documents have not been submitted to the Geotracker database. ACEH requests that all documents pertinent to this case must be submitted to Geotracker by **October 31, 2007**.

#### TECHNICAL REPORT REQUEST

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

- **October 31, 2007**– Revised Site Plan with Proposed Monitoring Well Locations (Figure 1)
- **December 15, 2007**– Monitoring Well Installation 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

Mr. Nick Garcia  
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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

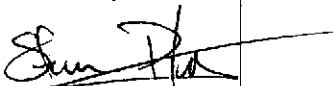
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

#### 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) 383-1767.

Sincerely,



Steven Plunkett  
Hazardous Materials Specialist

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

Donna Drogos, ACEH, Steven Plunkett, ACEH, File