

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

February 25, 2008

Mr. Nick Garcia
Olson Urban Housing, LLC
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 (Global ID#T06019771179), Impulse Motors, 1210 Bockman Road, San Lorenzo, CA

Dear Mr. Ploof and Ms. Wallace:

Alameda County Environmental Health (ACEH) staff has reviewed the case file and the documents entitled, "Monitoring Well Installation Report," received December 10, 2007 and prepared on your behalf by Secor International Inc (Secor). The report describes the installation of three groundwater monitoring wells downgradient of the former tank pit and fuel dispenser island. Due to underground utilities and other site constraints, Secor was unable to install a forth monitoring well as requested. Detectable levels of TPHg were discovered at concentrations of up to 6.1 parts per million (ppm) in soil and 0.71 parts per billion (ppb) in groundwater beneath the site.

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. **Quarterly Groundwater Monitoring.** ACEH requests that quarterly groundwater monitoring be implemented to evaluate groundwater quality, document groundwater flow trends and assess the dissolved phase petroleum hydrocarbon plume beneath and immediately downgradient of your site. Please present results from quarterly groundwater monitoring and sampling according to the schedule outlined below.
2. **Groundwater Sampling and Analysis.** All samples collected during groundwater sampling are to be submitted for the following chemical analysis: total petroleum hydrocarbons as gasoline (TPH-G), total petroleum hydrocarbons as diesel (TPH-D), benzene, toluene, ethylbenzene, total xylenes (BTEX compounds), five fuel oxygenates, methyl-t-butyl ether (MTBE), diisopropyl ether (DIPE), ethyl-t-butyl ether (ETBE), tert-amyl methyl ether (TAME), and tert-butanol (TBA), 1,2-dichloroethane (1,2-DCA), and ethylene dibromide. Please present the results from quarterly monitoring in the reports requested below.

TECHNICAL REPORT REQUEST

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

- **March 30, 2008** – 1st Quarter 2008 Groundwater Monitoring Report
- **June 30, 2008** – 2nd Quarter 2008 Groundwater Monitoring Report
- **September 30, 2008** – 3rd Quarter 2008 Groundwater Monitoring Report
- **December 30, 2008** – 4th Quarter 2008 Groundwater Monitoring 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.

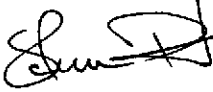
AGENCY OVERSIGHT

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.

Mr. Nick Garcia
January 21, 2008
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If you have any questions, please call me at (510) 383-1767.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven Plunkett", with a long horizontal line extending to the right across the page.

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