

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 5, 2006

Mr. Al Monceaux
MBM Corporation
5675 Sunol Blvd.
Pleasanton, CA 94566

Subject: Fuel Leak Case No. RO0002740, MBM Corporation, 5675 Sunol Blvd., Pleasanton, CA

Dear Mr. Monceaux:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site and the report entitled, "Subsurface Hydrogeologic Investigation and Groundwater Monitoring of hydrocarbons at the Former Diesel UST Site at the MBM Corporation Property," dated May 10, 2006 and received by ACEH on June 6, 2006. The report presents the results of groundwater sampling from three existing monitoring wells and soil and groundwater sampling from the installation on one additional monitoring well. The installation of an additional monitoring well was not approved by ACEH. In correspondence dated November 9, 2005 and May 24, 2006, ACEH requested that you submit a Work Plan detailing your proposal to define the extent of soil and groundwater contamination prior to implementing the investigation. No work plan was received by ACEH prior to the field investigation. Submittal of a Work Plan is necessary in order to assure that the proposed scope of work and investigation methods will be sufficient to characterize the site and address outstanding technical issues; thereby, avoiding multiple mobilizations to address data gaps. Most of the technical comments below should have been addressed at the Work Plan stage rather than after a field investigation had been implemented. We request that you prepare a Response to Comments to address the technical comments below by **September 12, 2006**. The need for and scope of additional site characterization will be reviewed based upon the completeness of the information provided in the Response to Comments.

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

TECHNICAL COMMENTS

- 1. Waste Oil and Motor Oil Tanks.** The report indicates that a 600-gallon waste oil tank and a 500-gallon motor oil tank were removed from the site in 1990. However, the report does not indicate the status of the tank closure or describe the results of the tank removal. Please provide the tank removal report, tank closure documents, and any other relevant information that describes the results of the tank removal. Please provide this information with the Response to Comments requested below.
- 2. Vapor Monitoring Well Installations.** The report references an Exceltech 06-29-90 report in describing vapor monitoring well installations in May 1990; however, no locations or results are provided. Please provide a copy of the Exceltech 06-29-90 report any other relevant

reports that shows the locations, construction details, and results from the vapor monitoring wells. Please provide this information with the Response to Comments requested below.

3. **Purpose of Existing Wells and Historic Data.** The report indicates that the existing wells were installed in response to a directive from the City of Pleasanton Fire Department, which cited deficiencies in monitoring and recordkeeping of UST leak detection monitoring and inventory control and the wells were installed to identify the presence of solvents related to waste oil disposal. Please provide a copy of the directive described above along with any other relevant information regarding the reasons for the installation of the existing monitoring wells. Please also provide all sampling results from the existing wells with the Response to Comments requested below.
4. **Groundwater Samples from Existing Monitoring Wells.** No information is provided on the construction of the three previously existing monitoring wells. Please provide the report (Geraghty & Miller 08-30-95) describing the well installation. In addition, please review the well construction information and discuss in the Response to Comments requested below whether the groundwater samples collected from the existing wells are representative of first-encountered groundwater beneath the site.
5. **Extent of Soil Contamination in Area of Diesel Tanks.** The investigation included the collection of four soil samples from the soil boring for well MW-4 but did not include any borings in the vicinity of the former tank pit. Well MW-4 was installed approximately 110 feet west northwest of the approximate location of the former 6,000-gallon diesel fuel tank. The former 6,000-gallon diesel tank is the location where the highest concentration of dissolved diesel fuel (5,500 micrograms per liter) was detected in a water sample collected from the tank pit. Therefore, the soil samples collected from the MW-4 boring do not help to define the horizontal or vertical extent of contamination in the area of the former tank pit. Please propose additional investigation in the area of the tank pit or discuss in the Response to Comments the rationale for not collecting soil or groundwater samples in the area of the former diesel tank pit.
6. **Figure 2.** Figure 2 shows wells located within the vicinity of the site but does not designate the type of wells or well construction. Please revise Figure 2 to show the designations for each well and provide a table for the wells shown on Figure 2, that shows the well designation, type of well, current status, total depth, date of installation, distance from the site, and screened or perforated interval. A revised Figure 2 and the well construction table is to be provided with the Response to Comments requested below,

TECHNICAL REPORT REQUEST

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

- **September 12, 2006 – Response to Agency Comments**

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 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.

Mr. Al Monceaux
July 5, 2006
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UNDERGROUND STORAGE TANK CLEANUP FUND

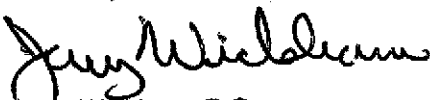
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: 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

Frank Goldman
Environmental and Hydrogeological Consulting
P.O. Box 59
Sonoma, CA 95476

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

SENT
05-25-06

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

May 24, 2006

Mr. Al Monceaux
MBM Corporation
5675 Sunol Blvd.
Pleasanton, CA 94566

Subject: Fuel Leak Case No. RO0002740, MBM Corporation, 5675 Sunol Blvd., Pleasanton, CA

Dear Mr. Monceaux:

In correspondence dated November 9, 2005, Alameda County Environmental Health (ACEH) requested a Work Plan for soil and water investigation at the above-referenced site by January 24, 2006. Based on a request made on your behalf by David Janney of W.A. Craig, the schedule for submittal of a Work Plan was extended to February 24, 2006. To date, we have not received a Work Plan or an additional request for time extension. Your site overlies a sensitive drinking water aquifer, and limited progress has been made toward evaluating potential petroleum hydrocarbon impacts. The lateral and vertical extents of subsurface contamination at the site are undefined. We reiterate the request made in our November 9, 2005 correspondence to evaluate whether groundwater has potentially been affected by a fuel release.

Your soil and water investigation Work Plan is late, and your fuel leak site is not in compliance with ACEH directives. In order for your site to return to compliance, please **submit the previously requested Revised Work Plan by June 26, 2006**. This date is not an extension of your due date, reports for this site are late and your site is out of compliance. ACEH makes this request pursuant to California Health & Safety Code Section 25296.10, 23 CCR sections 2652 through 2654, and 2721 through 2728 outline the duties of a responsible party in response to a reportable unauthorized release from a petroleum UST system, and require your compliance with this request.

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 note that further delays in investigation, late reports, or enforcement actions may result in your becoming ineligible to receive cost reimbursement from the State's Underground Storage Tank Cleanup Fund.

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

Sincerely,

Jerry Wickham
Hazardous Materials Specialist

Mr. Al Monceaux
May 24, 2006
Page 2

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

Shari Knieriem
SWRCB-USTCF
P.O. Box 944212
Sacramento, CA 94244

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT
11-9-05

ENVIRONMENTAL HEALTH SERVICES

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

November 9, 2005

Mr. Al Monceaux
MBM Corporation
5675 Sunol Blvd.
Pleasanton, CA 94566

Subject: Fuel Leak Case No. RO0002740, MBM Corporation, 5675 Sunol Blvd., Pleasanton, CA
- Request for Work Plan

Dear Mr. Monceaux:

I am the caseworker recently assigned to your case. Please send future correspondence or inquiries regarding this case to my attention. Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site and the report entitled, "Final Closure Report for Underground Storage Tank Removal," dated July 13, 2004, prepared on your behalf by W.A. Craig, Inc. The report summarizes the results from the removal of two 20,000-gallon diesel underground storage tanks (UST) and one 6,000-gallon gasoline UST. One soil sample collected from the tank excavation contained total petroleum hydrocarbons as diesel (TPHd) at a concentration of 5.6 milligrams per kilogram (mg/kg). Four soil samples from the excavated soil contained TPHd at concentrations up to 16 mg/kg. Three water samples contained TPHd at concentrations up to 5,500 micrograms per liter.

The site is within the Livermore-Amador Valley, which is an area where groundwater is actively used as a drinking water supply. Groundwater within the Livermore-Amador Groundwater Basin constitutes a valuable current and future resource. Due to the location of your site within a groundwater basin where groundwater is used for drinking water, we request that you conduct an investigation to assess whether groundwater at the site has been impacted.

Please submit a work plan detailing your proposal to define the extent of soil and groundwater contamination by **January 24, 2006**. 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.

TECHNICAL REPORT REQUEST

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

- **January 24, 2006** – Work Plan for Site Assessment

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.

LANDOWNER NOTIFICATION REQUIREMENTS

Pursuant to California Health & Safety Code Section 25297.15, the active or primary responsible party for a fuel leak case must inform all current property owners of the site of cleanup actions or requests for closure. Furthermore, ACEH may not consider any cleanup proposals or requests for case closure without assurance that this notification requirement has been met. Additionally, the active or primary responsible party is required to forward to ACEH a complete mailing list of all record fee title holders to the site. **We have received your correspondence dated September 27, 2004 identifying the current list of record fee title owners.**

In the future, for you to meet these requirements when submitting cleanup proposals or requests for case closure, ACEH requires that you:

1. Notify all current record owners of fee title to the site of any cleanup proposals or requests for case closure;
2. Submit a letter to ACEH which certifies that the notification requirement in 25297.15(a) of the Health and Safety Code has been met;
3. Forward to ACEH a copy of your complete mailing list of all record fee title holders to the site; and
4. Update your mailing list of all record fee title holders, and repeat the process outlined above prior to submittal of any additional *Corrective Action Plan* or your *Request for Case Closure*.

Your written certification to ACEH (Item 2 above) must state, at a minimum, the following:

A. *In accordance with Section 25297.15(a) 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)*
- request for case closure*
- local agency intention to make a determination that no further action is required*
- local agency intention to issue a closure letter*

- OR -

B. *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.*

(Note: Complete item A if there are multiple site landowners. If you are the sole site landowner, skip item A and complete item B.)

UNDERGROUND STORAGE TANK CLEANUP FUND

Please be aware that you may be eligible for reimbursement of the costs of investigation from the California Underground Storage Tank Cleanup Fund (Fund). In some cases, a deductible amount may apply. If you believe you meet the eligibility requirements, I strongly encourage you to call the Fund for an application.

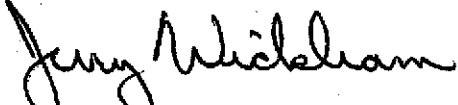
AGENCY OVERSIGHT

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. Al Monceaux
November 9, 2005
Page 4

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: 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

Christine Truesdale
W.A. Craig, Inc.
6940 Tremont Road
Dixon, CA 95620

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02740

September 19, 1990

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

David Sossamon
Proficient Food Company
5675 Sunol Blvd.
Pleasanton, CA 94566

Re: Waste Minimization Assessment

Dear David Sossamon:

Your business has been selected to receive a hazardous waste minimization assessment. As you are probably aware, hazardous waste reduction has become a statewide, if not a national, issue. To address this issue at a county level, Alameda County is establishing its own Hazardous Waste Minimization Program and is planning to conduct waste minimization assessments for all hazardous waste generating facilities in the County.

We have chosen businesses in the auto repair industry to receive the first round of waste minimization assessments. It is our hope that these assessments will assist participating businesses in minimizing their hazardous wastes - and will give us further information on the best way to structure our minimization program.

One of our Hazardous Materials Specialists will be contacting you during the week of September 24 to arrange a meeting with you for an assessment of your business. During this meeting and assessment, the Specialist will work with you in examining your business's hazardous waste generating practices. The Specialist will then provide you with materials on waste reduction technology and assist you in setting up appropriate hazardous waste minimization practices.

We look forward to working with you in reducing the amount of hazardous waste your business generates. Of course, your comments and suggestions are encouraged; we need your input in order to best serve you! Please direct any comments and questions to Katherine Chesick at 415/271-4320.

Sincerely,

A handwritten signature in cursive script that reads "Edgar B. Howell".

Edgar B. Howell, Chief,
Alameda County Hazardous Materials Division

EBH:kac

cc: Fire Department
Files