

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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January 16, 2008

Masood and Sharbano Amini
Springtown Gas
909 Bluebell Drive
Livermore, CA 94551-1419

Subject: Fuel Leak Case No. RO0002894 and Geotracker Global ID T06019716197, Springtown Gas, 909 Bluebell Drive, Livermore, CA 94551

Dear Masood and Sharbano Amini:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site, including the recently submitted documents entitled, "Work Plan for Off-site Groundwater Investigation for the Property Located at 909 Bluebell Drive, Livermore, California," dated December 17, 2007 and "Groundwater Monitoring and Sampling for the Property," dated January 7, 2008. The Work Plan, which was prepared on your behalf by Enviro Soil Tech Consultants, proposes a scope of work that includes six direct push borings on adjacent properties, installation of additional monitoring wells, installation of vapor wells, conducting an 8-hour soil vapor extraction (SVE) pilot test, and conducting groundwater extraction from tank pit backfill wells for a period of two weeks. Several technical comments on the Work Plan are presented below. In order to address the technical comments, we request that you submit a revised Work Plan by **March 19, 2008**.

TECHNICAL COMMENTS

1. **Off-site Direct-Push Boring Locations.** We have no objection to the off-site proposed off-site direct-push boring locations.
2. **Vapor Extraction and Observation Wells.** We concur that the existing monitoring wells are not suitable for vapor extraction or observation and that installation of vapor extraction and observation wells are necessary for a SVE pilot test. The Work Plan currently proposes one extraction well adjacent to boring SB-8. We have no objection to the proposed extraction well location. However, the proposed location is adjacent to the tank pit and preferential air flow through the tank pit must be considered in estimating a radius of influence. The Work Plan discusses installation of a second vadose zone approximately 20 feet from the extraction well and refers to a location on Figure 1. No observation well appears to be shown on Figure 1. In the revised Work Plan requested below, please include additional extraction/observation wells to adequately evaluate induced air flow. In order to evaluate anisotropic response due to preferential air flow through the tank pit, please include, at a minimum, one additional observation well within the tank pit. If the existing tank pit wells are to be used as observation wells, well construction details must be confirmed and presented in the revised Work Plan.
3. **Soil Vapor Extraction Pilot Test.** Operational parameters of the proposed SVE pilot test are not adequately described in the Work Plan. The SVE pilot test must be conducted with a minimum of four increases (steps) in applied vacuum/flow to evaluate flow within the vadose

zone. The duration of each test will depend upon the time required to reach equilibrium. At each interval, the following operational parameters are to be measured and recorded: applied vacuum, flow rate including flow stream temperature and pressure, and observed vacuum at the each observation well. Operational parameters are to be measured at 10 to 15 minute intervals during the initial phase of each step and at 15 to 30 minute intervals during the remainder of the each step. In the revised Work Plan requested below, please expand the discussion of SVE pilot test operational parameters.

4. **Proposed Vapor Analyses.** The initial and final vapor samples collected during the step with the highest field PID reading are to be submitted for laboratory analyses. Please revise the proposed laboratory analytical methods to include analysis for TBA using an appropriate method for vapor analysis.
5. **Groundwater Extraction.** We do not concur with the proposal to conduct two weeks of groundwater extraction for interim remediation. Groundwater extraction is not likely to be cost effective for mass removal and it is not clear that plume migration control is necessary at this site.
6. **Monitoring Well Installation.** Prior to installation of any additional monitoring wells, results from the off-site soil borings and proposed construction details must be submitted to ACEH for review. In no case, shall additional wells be installed with screen intervals from 10 to 20 feet as proposed on page 7 of the Work Plan. The depth to groundwater at the site is less than 10 feet bgs. The tops of the screen intervals of the three existing wells (screened from 10 to 20 feet bgs) are submerged. A significant amount of contamination has been detected within the vadose zone and near the top of the water table. Since the screen intervals of the existing wells are below these zones, the groundwater samples collected from the existing wells are not representative of the upper portion of the water table.
7. **Groundwater Monitoring.** Quarterly groundwater monitoring is to be suspended at this time. Due to the limitations discussed in technical comment 6, continued quarterly groundwater sampling of the three existing monitoring wells with submerged screens is not justified. Groundwater monitoring may be implemented at some point in the future in order to monitor remedial progress or possible downward plume migration.
8. **Analysis for PCE and TCE.** It is not clear why soil and groundwater samples continue to be analyzed for tetrachloroethene (PCE) and trichloroethene (TCE). Previous work plans for the site have proposed analyses for TPH as gasoline and TPH as diesel by EPA Method 8015 and analyses for volatile aromatic hydrocarbons (BTEX), gasoline oxygenates, and lead scavengers by EPA Method 8260. Analyses for a full target list of volatile organic compounds including PCE and TCE was not proposed in the work plans and was not requested or approved by ACEH. We recommend that the UST Cleanup Fund not pay additional costs for analyses of an expanded list of VOCs.

TECHNICAL REPORT REQUEST

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

- **March 19, 2008** – Revised 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

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

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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

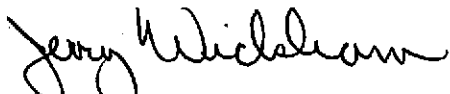
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Cheryl Dizon, 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

Paul Smith, Livermore-Pleasanton Fire Department, 3560 Nevada Street
Pleasanton, CA 94566

Frank Hamedi, Enviro Soil Tech Consultants, 131 Tully Road, San Jose, CA 95111

Donna Drogos, ACEH
Jerry Wickham, ACEH
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