

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



F

March 26, 2008

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

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

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 fuel leak case, including the recently submitted document entitled, "*Revised Work Plan for Off-site Groundwater Investigation for the Property Located at 909 Bluebell Drive, Livermore, California,*" dated February 19, 2008 and received by ACEH on March 5, 2008. The Revised 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 a vapor extraction well, and conducting a soil vapor extraction (SVE) pilot test. The Revised Work Plan was prepared in response to technical comments in our January 16, 2008 correspondence. Although most of the technical comments in our January 16, 2008 correspondence have been addressed in the Revised Work Plan, several additional revisions not requested by ACEH were also made to the Work Plan. It is not clear why additional revisions beyond those requested by ACEH were made since some of the revisions raise additional questions.

Although we have technical comments on the Revised Work Plan, the proposed scope of work may be implemented provided that the technical comments below are addressed and incorporated during the proposed field investigations. Submittal of a second revised work plan or work plan addendum is not required unless an alternate scope of work outside that described in the Revised Work Plan dated February 19, 2008 and technical comments below is proposed.

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

TECHNICAL COMMENTS

1. **Off-site Direct-Push Boring Locations.** We have no objection to the six proposed off-site direct-push boring locations (GP-5 through GP-10). We note that although seven proposed soil boring locations are shown on Figure 1, one of the borings shown with an open symbol for proposed locations is boring GP-4, which was advanced in August 2007. Please present the results from the off-site borings in the Off-Site Investigation and Pilot Test Report requested below.
2. **Tank Pit Wells.** The Revised Work Plan proposes a downhole camera survey to identify how the two tank pit wells are constructed. Use of the existing tank pit wells is acceptable

provided that the wells have sufficient screen length in the unsaturated zone to be used for observation wells during the SVE test.

3. **Vapor Extraction and Observation Wells.** The existing monitoring wells are not suitable for vapor extraction or observation and installation of vapor extraction and observation wells are necessary for a SVE pilot test. The previous Work Plan dated December 17, 2007 proposed installation of one extraction well adjacent to boring SB-8 (VE-1) and an observation well approximately 20 feet from the extraction well. Although the December 17, 2007 referred to locations on Figure 1 of the Work Plan; no location for a second well was shown on any of the site maps. Our January 16, 2008 correspondence requested additional extraction/observation wells to adequately evaluate induced air flow. Figure 1 of the Revised Work Plan now shows a second proposed vadose zone well (VE-2); however, installation of a second well for observation is not discussed in the text and the Revised Work Plan appears to propose using only the two existing tank pit wells for observation. The pilot test must include an observation well outside the tank pit. Therefore, we request that you install an observation well in the area of proposed well VE-2 with similar construction to that of proposed extraction well VE-1.
4. **Soil Vapor Extraction Pilot Test Duration.** The Revised Work Plan does not discuss the duration of the SVE pilot test; however the December 17, 2007 Work Plan proposed an 8-hour test. We have no objection to a proposed duration of 8 hours for the SVE pilot test but simply request that you base the duration of each test upon the time required for parameters to stabilize. Please present the results from the off-site borings in the Off-Site Investigation and Pilot Test Report requested below.
5. **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.

TECHNICAL REPORT REQUEST

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

- **June 27, 2008** – Off-Site Investigation and Pilot Test 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.

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 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.

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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
File

**Alameda County Environmental Cleanup
Oversight Programs
(LOP and SLIC)**

ISSUE DATE: July 5, 2005

REVISION DATE: December 16, 2005

PREVIOUS REVISIONS: October 31, 2005

SECTION: Miscellaneous Administrative Topics & Procedures

SUBJECT: Electronic Report Upload (ftp) Instructions

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.

REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:
RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

Submission Instructions

- 1) Obtain User Name and Password:
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to dehloptoxic@acgov.org
or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
 - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload)