

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

August 8, 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 fuel leak case, including the recently submitted report entitled, "*Work Plan, Site Conceptual Model, Hydrogen Peroxide Injection, Groundwater Monitoring/Sampling/Analyses, Springtown Gas, 909 Bluebell Drive, Livermore, California,*" dated July 30, 2008 (Work Plan). The Work Plan, which was prepared on your behalf by Geological Technics, Inc., proposes preparation of a site conceptual model to provide a basis for additional assessment and preparation of a Corrective Action Plan, a limited pilot test for in-situ chemical oxidation, and one year of groundwater monitoring.

The scope of work is conditionally approved and may be implemented provided that the technical comments below are addressed and incorporated during the proposed activities. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Site Conceptual Model.** We concur with the proposal to prepare a site conceptual model (SCM). The SCM is to provide a synthesis of the site characterization data and provide a framework for additional assessment work. The SCM is to also incorporate the results of the pilot test in order to evaluate the effectiveness of the pilot test and propose additional monitoring and injection wells.
2. **Proposed Monitoring Well P-1.** We concur with the proposal to install proposed well P-1 for injections and monitoring during the proposed pilot test.
3. **Groundwater Monitoring Prior to and during Pilot Test.** We request that you sample the three groundwater monitoring wells and two vapor extraction wells prior to the initial injection event and no later than one month after the initial injection during the pilot test. The Work Plan currently proposes groundwater monitoring for metals. In order to assess whether the oxidant injection has significantly increased dissolved phase concentrations, we request that you also analyze the groundwater samples for TPH as gasoline, BTEX, and fuel oxygenates. Please include these results in the Pilot Test Report requested below.

4. **Monitoring Parameters for Pilot Test.** During the initial chemical oxidant injection, we request that the monitoring include measurements of temperature and volatile organic compounds (by PID is acceptable) using the available groundwater monitoring wells and injection wells. These parameters are to be measured frequently during the initial application of hydrogen peroxide solution and should continue for a minimum of two hours after the last application of the day. Based upon the parameters observed during the initial injection application, the frequency may be decreased during subsequent applications. Please include these results in the Pilot Test Report requested below.
5. **Pilot Test Injections.** The Work Plan proposes oxidant injections during the pilot test in wells STMW-2, STMW-3, and P-1. We request that pilot test injections be conducted in monitoring STMW-1 rather than STMW-2 due to the proximity of well STMW-2 to the USTs, piping, and tank pit backfill.
6. **Quarterly Groundwater Monitoring.** The proposal to implement quarterly groundwater monitoring is acceptable. Please present the results in the groundwater monitoring reports requested below.

TECHNICAL REPORT REQUEST

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

- **November 17, 2008** – Third Quarter 2008 Groundwater Monitoring Report
- **December 8, 2008** – Pilot Test Report and Site Conceptual Model
- **February 16, 2009** – Fourth Quarter 2008 Groundwater Monitoring Report
- **May 19, 2009** – First Quarter 2009 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.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies 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 all 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, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is 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.

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.

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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

Raynold Kablanow, Geological Technics, Inc., 1101 7th Street, Modesto, CA 95354

Matthew Spielman, Geological Technics, Inc., 1101 7th Street, Modesto, CA 95354

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)