



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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December 24, 2008

Masood Filibadi 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 reports entitled, "*Hydrogen Peroxide Injection Pilot Test, Springtown Gas, 909 Bluebell Drive, Livermore, California,*" dated December 5, 2008 (Pilot Test Report) and "*Site Conceptual Model, December 2008, Springtown Gas, 909 Bluebell Drive, Livermore, California,*" dated December 5, 2008 (SCM). Both reports were prepared on your behalf by Geological Technics, Inc.

The Pilot Test Report recommends the preparation of a Remedial Action Plan including additional investigation, implementation of continuous low flow injection of 3% solution hydrogen peroxide, evaluation of the need for a catalyst, and monitoring of metals during remediation. The SCM recommends continuing quarterly groundwater monitoring, advancing borings to further define the horizontal extent of contamination, advancing deep borings up to 70 feet deep close to the core of the plume, installation of injection wells, and preparation of a Corrective Action Plan (CAP).

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

TECHNICAL COMMENTS ON SITE CONCEPTUAL MODEL

- 1. Horizontal Extent of Contamination.** The SCM proposes advancing 5 to 6 borings north, east, and northwest of the site to define the horizontal extent of contamination. Based on results from previous off-site borings north of Bluebell Drive, a channel of coarse-grained soils may provide a preferential pathway for plume migration to the north through sampling location GP-8. In the Draft CAP requested below, please present proposed locations and plans for the additional borings to define the horizontal extent of contamination. Please discuss the rationale for the proposed borings including evaluating the potential channelized flow and contaminant migration within the sand layer.
- 2. Vertical Extent of Contamination.** The SCM proposes advancing 3 to 4 deep borings close to the core of the plume to define the vertical extent of contamination. We note that boring CPT-1 was advanced to a depth of approximately 68 feet bgs to collect depth-discrete grab groundwater samples at a location immediately north of the underground storage tanks. In the Draft CAP requested below, please present proposed locations and plans for the additional borings to define the vertical extent of contamination. Please discuss the additional information that will be collected in the proposed deep borings that is not available from the existing CPT borings.

3. **Vertical Gradient.** The SCM discusses the importance of knowing the vertical gradient between sand layers to understand plume migration to lower zones. However, the SCM does not include recommendations for evaluating the vertical gradient. In the Draft CAP requested below, please describe whether the evaluation of vertical gradient will be contingent upon results from the deeper borings. In addition, please discuss the need for deeper monitoring wells to monitor the lower sand layer(s) during remediation.
4. **Plume Maps (Figures 17 through 20).** The figures showing the horizontal extent of contamination (Figures 17 through 20) show only concentration contours within the site boundary. For future plume maps, we request that you post the concentrations for individual sampling locations to help illustrate the off-site extent of the plume as well as the on-site extent.
5. **Depth of Injections.** The Pilot Test Report recommends injecting oxidant separately at depths of 5 to 10 feet bgs and 10 to 20 feet bgs. In the Draft CAP requested below, please describe the rationale for injecting the oxidant at different depths in separate wells.
6. **Draft Corrective Action Plan.** Please present plans for implementing continuous low flow injection of oxidant in the Draft CAP requested below. Monitoring methods, frequency, and parameters must also be described. Public participation is a requirement for the Corrective Action Plan process. Therefore, ACEH will notify potentially affected members of the public who live or own property in the surrounding area of the proposed remediation described in the Draft CAP. Public comments on the proposed remediation will be accepted for a 30-day period. After the public comments have been reviewed and addressed, ACEH may request responses to the comments with revisions to the CAP or may provide approval for installation and operation of the proposed remediation system. Additional investigation activities described in the Draft CAP may be implemented prior to the public review process following review and approval of the investigation activities in the Draft CAP by ACEH.
7. **Quarterly Groundwater Monitoring.** Please continue quarterly groundwater monitoring and 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:

- **February 16, 2009** – Fourth Quarter 2008 Groundwater Monitoring Report
- **March 6, 2009** – Draft Corrective Action Plan
- **May 19, 2009** – First Quarter 2009 Groundwater Monitoring Report
- **August 19, 2009** – Second 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.

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UNDERGROUND STORAGE TANK CLEANUP FUND

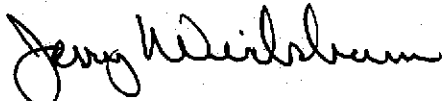
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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 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

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

Reza Namdar Ghanbari, 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)