

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
8-14-06

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

September 13, 2006

Mr. Bruce Qvale
First Street LLC
901 Van Ness Avenue
San Francisco, CA 94109

Subject: SLIC Case RO0002928, Former Livermore Subaru Honda, 3800 First Street, Livermore, CA 94551

Dear Mr. Qvale:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above-referenced site, including the documents entitled, "Subsurface Sampling and Sump Over-Excavation," dated August 28, 2006 and "Workplan - Remedial Activities at Former Wash Bay Sump," dated September 6, 2006. Both reports were prepared on behalf of Livermore Subaru Honda by Clayton Group Services, Inc. During removal of a sump structure on May 11, 2006, petroleum hydrocarbons were encountered in soil and groundwater beneath the former sump. Five soil borings were advanced on June 6, 2006, one boring in the center of the sump and four borings in the area surrounding the sump. Based on the results of the borings, soil excavation beneath the sump was conducted as an interim remedial action on July 7, 2006. The interim remedial action excavated impacted soil but could not be completed due to the proximity of the building foundation. The Subsurface Sampling and Sump Over-Excavation report presents the results of the soil borings and excavation activities conducted in the area of the sump. The Work Plan proposes excavation of the residual petroleum-impacted soil following removal of the existing building. The proposed scope of work is acceptable provided that the technical comments below are addressed during the remedial action.

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

TECHNICAL COMMENTS

1. **Confirmation Soil Sampling.** The excavation is to be extended beyond the limits of the previous excavation to the maximum practicable extent to remove residual petroleum hydrocarbons as indicated by visual observations, odors, and photoionization detector (PID) readings. The excavation is to be extended in all directions where residual hydrocarbons were left in place. In addition, the excavation should be extended toward First Street along the sewer line to evaluate whether the sewer line acted as a preferential pathway for contaminant migration. Once the excavation has removed residual hydrocarbons to the maximum practicable extent, confirmation soil samples are to be collected from each of the sidewalls at horizontal intervals no greater than 10 feet from the corners of the excavation or other sidewall samples. Therefore, a sidewall 1 to 19 feet in length would require a minimum of one sidewall sample, a sidewall 20 to 29 feet in length would require a minimum of two

sidewall samples, and a sidewall 30 to 39 feet in length would require a minimum of three sidewall samples. Additional confirmation samples may be required based upon field observations. The sidewall samples are to be collected at approximate depths where soil contamination was previously observed in the excavation or as directed by ACEH in the field. The number of soil samples collected from the bottom of the excavation is to be based on the size of the excavation but should be no less than a minimum of two confirmation soil samples from the base of the excavation. We request that soil samples be collected from the base of the excavation regardless of whether a groundwater sample is collected. Please present results of the excavation and soil confirmation sampling in the Soil Excavation and Confirmation Sampling report requested below.

2. **Proposed Soil Analyses.** The proposed laboratory analyses are acceptable; however, the number of confirmation samples collected according to the criteria discussed in technical comment 1 above is likely to exceed the estimated 10 samples.
3. **Grab Groundwater Sampling from Excavation.** We concur with the proposal to collect a grab groundwater sample if groundwater enters the excavation. We request that accumulated water be pumped from the excavation and the groundwater allowed to recharge prior to collection of a grab water sample. Please present results of the grab groundwater sampling in the Soil Excavation and Confirmation Sampling report requested below.
4. **Site Maps.** In future reports for the site, please show the approximate locations of the former underground storage tank pit, dispensers, and other relevant features on site plans (such as Figures 1 through 3 in the Work Plan).
5. **Metals Concentrations in Soil.** The Soil Excavation and Confirmation Sampling Report requested below is to include an evaluation of metals concentrations in soil, including the elevated concentrations of chromium and nickel detected in previous soil samples at the site.
6. **Extent of Groundwater Contamination.** Elevated concentrations of total petroleum hydrocarbons as gasoline, diesel, and motor oil were detected in the grab groundwater samples collected on May 1, 2006 from beneath former sump. Volatile organic compounds and metals were also detected in the grab groundwater sample. Additional investigation is required to delineate the extent of groundwater contamination. Please submit a Work Plan or Work Plan Addendum that proposes a scope of work to fully define the horizontal and vertical extent of groundwater contamination. We recommend the collection of depth-discrete groundwater samples to evaluate the extent of contamination prior to monitoring well installation. Please present these plans in the Work Plan requested below.

TECHNICAL REPORT REQUEST

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

- **December 15, 2006 – Work Plan to Characterize Extent of Groundwater Contamination**
- **Within 120 days of building demolition but no later than April 15, 2007 – Soil Excavation and Confirmation Sampling 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

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.

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: Lindsey Robbins, Livermore Honda, 3200 Las Positas Road, Livermore, CA 94551

Donald Ashton, Clayton Group Services, Inc., 6920 Koll Center Parkway, Suite 216
Pleasanton, CA 94566

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

John Rigger, Livermore-Pleasanton Fire Department, 3560 Nevada Street
Pleasanton, CA 94566

Stephen Cloudsley, Real Estate Consulting, 1561 Ramona Way, Alamo, CA 94507

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

✓ R02928 (SUC)
R0 R0934 (LOP)

April 6, 1992

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

Mr. George Gangi, General Manager
Livermore Honda
3800 N. First Street
Livermore, CA 94550

Re: FIVE-YEAR PERMITS FOR OPERATION OF THREE
UNDERGROUND STORAGE TANKS (UST'S) AT 3800 N.
FIRST STREET LIVERMORE.

According to our records the above mentioned facility has not received a five-year permit to operate UST's. Please complete the following items marked below and return them to me within 30 days. The example plans enclosed, should be used only as guidelines and may not meet your requirements under Title 23.

1. An accurate and complete plot plan.
2. A written spill response plan. (enclosed)
3. A written tank monitoring plan. (enclosed)
4. Results of precision tank test(s) (initial and annual).
5. Results of precision pipeline leak detector tests (initial and annual).
6. Complete UST PERMIT FORM A-one per facility. (enclosed)
7. Complete UST PERMIT FORM B-one per tank. (enclosed)
8. Complete UST PERMIT FORM C-one per tank if information is available. (enclosed)

Title 23 of the California Code of Regulation prohibits the operation of ANY UST without a permit. Please feel free to contact Jeff Shapiro at (510) 271-4320, if you have any questions which may arise in completing the mandatory five-year permit process.

Sincerely,

Ravi Arulanantham
Senior Hazardous Materials Specialist

c: Gil Jensen, Alameda County District Attorney,
Rafat Shahid, Assistant Agency Director, Alameda
County Department of Environmental Health
Danielle Stefani, Hazardous Materials Specialist, City of
Livermore Fire Department