

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



F

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

November 1, 2007

Mrs. JoAnn Stewart  
Good Chevrolet  
1630 Park Street  
Alameda, CA 94501

Subject: Fuel Leak Case No. RO0000008 (Global ID #T0600100655), Good Chevrolet, 1630 Park Street, Alameda, CA

Dear Mrs. Stewart:

Alameda County Environmental Health Department (ACEH) staff has reviewed the report entitled, "Work Plan for Additional Subsurface Investigation", dated September 27, 2007 and prepared on your behalf by Blymyer Engineers. The work plan prepared by Blymyer recommends the redevelopment of all existing groundwater monitoring wells and subsequent groundwater sampling following well redevelopment. Additionally, Blymyer will resume site characterizations activities, which will include the installation of nine soil boring with associated soil and groundwater sampling, groundwater monitoring well installation, development and sampling and survey of the monitoring wells to a known datum.

Once onsite and offsite soil and groundwater characterization activities are completed, interim remedial measure will be required on site to mitigate residual TPH contamination.

Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to [steven.plunkett@acgov.org](mailto:steven.plunkett@acgov.org)) prior to the start of field activities.

**TECHNICAL COMMENTS**

**1. Preferential Pathway Study**

In a previous correspondence ACEH requested that you complete a preferential pathway study, we have yet to receive the preferential pathway study as requested. We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for horizontal and vertical migration that may be present in the vicinity of the site. Discuss your analysis and interpretation of the results of the preferential pathway study (including the detailed well survey and utility survey requested below) and report your results in the Well Installation Report requested below. Include an evaluation of the probability of the dissolved phase and NAPL plumes for all constituents of concern encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper aquifers. The results of your study shall contain all information required by 23 CCR, Section 2654(b).

a) **Utility Survey**

An evaluation of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s) is required as part of your study. Submittal of map(s) and cross-sections showing the location and depth of all utility lines and trenches within and near the site and plume area(s) is required as part of your study.

b) **Well Survey**

The preferential pathway study shall include a well survey of all wells (monitoring and production wells: active, inactive, standby decommissioned (sealed with concrete), abandoned, (improperly decommissioned or lost); and dewatering and cathodic protection wells) within a ¼ mile radius of the subject site. The well survey should include well data from California Department of Water Resource well database and Alameda County Department of Public Works. Present the result from the preferential pathway study in the report requested below.

2. **Monitoring Well Survey, Redevelopment and Sampling and Quarterly Monitoring.**

During our review of the work plan, ACEH concluded that site monitoring wells might not be properly surveyed to establish the unique coordinates for each well location. Prior to the submission of any data or reports to the State Water Resourced Control Board's Geotracker database, ACEH requests that all existing monitoring wells be surveyed by a California licensed professional surveyor. In addition, Blymyer recommends that monitoring well redevelopment is complete when a maximum of ten well volumes have been removed. Well redevelopment is considered complete when water quality parameters have stabilized within accepted limits, and turbidity is below a predetermined maximum value, which may require the removal of over ten well volumes. Throughout well redevelopment, water quality parameter including pH, temperature, electrical conductivity and turbidity must be recorded after each well volume. ACEH agrees with the laboratory analysis as recommended in the work plan. Lastly, once well redevelopment and sampling has been completed we request that quarterly groundwater monitoring be implemented for all monitoring wells. Please present results for the well redevelopment and groundwater sampling in the report requested below.

3. **Site Characterization and Soil Boring Locations.** The vertical and horizontal extent of soil and groundwater hydrocarbon contamination associated with the unauthorized release at your site is undefined. In particular, very high concentrations of TPHg, benzene and MtBE have been detected in soil beneath your site at concentrations of up to 15,000 ppm, 84 ppm and 9.3 ppm, respectively. Furthermore, soil sampling conducted in the former UST tank pit detected TPHg and benzene pollution 12 feet bgs at concentrations of 1,300 ppm and 9.4 ppm, respectively. The high concentrations of TPH at 12 feet bgs, combined with the lack of analytical data below 12 feet indicates that additional characterization at a depth below 12 feet is necessary to determine the vertical extent of soil contamination in the source area. The soil sample laboratory analysis recommended by Blymyer is acceptable.

ACEH requests the soil boring must be installed to a maximum depth of 25 feet below ground surface in the source area. Further, soil samples must be collected and submitted for

laboratory analysis at any interval where staining odor or elevated PID readings are observed, at the capillary fringe, at distinct changes in lithology and at the total depth of the soil boring.

The soil boring locations in the current configuration is unacceptable. Please prepare a revised work plan that includes additional soil boring locations in the source area, immediately down-gradient of the former UST tank pit. Please reconfigure the soil borings on both the north and south sides of Park Street as transects, we recommend you consider 20 to 30 foot spacing for the soil borings. Please prepare an addendum to the work plan that shows the location of soil borings in the source area and along the north and south side of Park Street in the report requested below.

4. **Monitoring Well Installation.** Blymyer has suggested that once the soil and groundwater investigation is completed, two additional monitoring wells may be installed. ACEH recommends that the number of new monitoring wells should be determined once the investigation is completed, and at minimum two additional monitoring wells must be installed. ACEH agrees with the monitoring well construction, soil sampling and laboratory analysis recommended by Blymyer.
5. **Hydrogeologic Cross Sections.** The SWI Report requested below is to include detailed hydrogeologic cross section in the groundwater flow direction and one cross section approximately perpendicular to the direction of groundwater flow. Each cross section should include the following:
  - a. **Surface topography.** The cross sections should be extended off-site where necessary to show significant breaks in slope.
  - b. **Soil descriptions** for all borings and wells along the line of section.
  - c. **Screen and filter pack intervals** for each monitoring well.
  - d. **Sampling locations and results** for soil and grab groundwater samples.
  - e. **Site features** such as the tank pit, dispensers, etc.
  - f. Where appropriate, monitoring well location and soil boring locations will be projected back to the strike of the cross section line.
6. **Geotracker Submissions.** During our customary review of the State Water Resources Control Board Geotracker website, we found that the Work Plan for Additional Subsurface Investigation has not been submitted to the Geotracker database. Please perform the electronic submittal for applicable document and submit verification to this Agency by November 15, 2007.

#### **TECHNICAL REPORT REQUEST**

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

- **November 21, 2007** – Work Plan Addendum
- **December 15, 2007** – 4<sup>th</sup> Quarter 2007 Groundwater Monitoring Report
- **January 1, 2008** – Soil and Groundwater Investigation Report with Preferential Pathway Survey

- **March 1, 2008** – Interim Remedial Action Plan
- **March 15, 2008** – 1<sup>st</sup> Quarter 2008 Groundwater Monitoring Report
- **June 15, 2008** – 2<sup>nd</sup> Quarter 2008 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

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](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.

Should you have any questions, do not hesitate to call me at (510) 383-1767.

Sincerely,



Steven Plunkett  
Hazardous Materials Specialist

cc: Mark Detterman  
Blymyer Engineers, Inc.  
1829 Clement Avenue  
Alameda, CA 94501-1395

Donna Drogos, ACEH, Steven Plunkett, ACEH, File