

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  
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January 16, 2008

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" and "Addendum to Workplan," dated September 27, 2007 and November 30, 2007 and prepared on your behalf by Blymyer Engineers. The addendum to work includes recommends the installation of 22 onsite and offsite soil boring, soil and groundwater sampling, installation of two groundwater monitoring wells, and the implementation of quarterly groundwater monitoring for all onsite and offsite monitoring wells. ACEH generally agrees with the work plan addendum, provided the following comments are addressed prior to implementation of the work plan.

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 Survey.** In a prior correspondence ACEH directed you to perform a preferential pathway survey to determine if underground utilities could be acting as a migration pathway for the dispersion of contamination downgradient of your site. ACEH generally agrees with the recommendation by Blymyer to conduct a preferential pathway survey. Please present results from the preferential pathway survey in the report requested below.
2. **Site Characterization and Soil Boring Locations.** To determine the vertical and horizontal extent of hydrocarbon contamination beneath and downgradient of your site Blymyer has proposed the installation of 21 onsite and offsite soil borings. Historically high concentrations of TPHg, benzene and MtBE have been detected in soil and groundwater beneath your site at concentrations of up to 15,000 ppm, 84 ppm and 9.3 ppm, respectively. ACEH generally agrees with the proposed soil boring locations as recommended in the work plan. The soil boring locations in their current configuration are acceptable. Please present results for the soil and groundwater investigation in the work plan requested below.
3. **Soil Sampling and Analysis.** Soil samples are to be collected from all onsite soil borings. During the soil boring installation, soil samples should be screened with a PID and examined

for visible staining and hydrocarbon odor. Any interval where staining, odor, or elevated PID readings occur a soil sample is to be collected and submitted for laboratory analysis. If no staining, odor, or elevated PID readings are observed, soil samples are to be collected from each boring at the capillary fringe, where groundwater is first encountered, changes in lithology, and at the total depth of the boring at least 20 feet below ground surface.

All soil samples collected during the investigation are to be analyzed for TPHg and TPHd by EPA Method 8015M or 8260, BTEX, EDB, EDC, MtBE, TAME, ETBE, DIPE, TBA and EtOH by EPA Method 8260. Please present the results from the soil sampling in the Soil and Groundwater Investigation Report requested below.

4. **Groundwater Sampling and Analysis.** All groundwater samples collected during the investigation are to be analyzed for TPHg, TPHd and TPHk by EPA Method 8015M or 8260, BTEX, EDB, EDC, MtBE, TAME, ETBE, DIPE, TBA and EtOH by EPA Method 8260. Please present the results from the soil and groundwater sampling in the Soil and Groundwater Investigation Report requested below.
5. **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 January 30, 2008.

#### **TECHNICAL REPORT REQUEST**

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

- **February 15, 2008** – Preferential Pathway Survey
- **February 30, 2008** – Soil and Groundwater Investigation 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.

JoAnn Stewart  
January 11, 2008  
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Sincerely,

A handwritten signature in black ink, appearing to read "Steven Plunkett", with a long horizontal stroke extending to the right.

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