

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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December 5, 2008

Linda Strough
Donald V and Linda L Strough Trust
2 Sea View Ave.
Piedmont, CA 94611

W. Bruce Berkovich
COCRAIG, LTD.
100 The Embarcadero Penthouse
San Francisco, CA 94105

Subject: Fuel Leak Case No. RO0000134 and Geotracker Global ID T0600101644, Val Strough Chevrolet, 327 34th Street, Oakland, CA 94609

Dear Mrs. Strough:

Alameda County Environmental Health (ACEH) staff has reviewed the February 29, 2008 *Supplemental Source Area investigation Report* and August 2008 *Interim Remedial Action Plan (IRAP)* as amended by the November 10, 2008 e-mail, prepared by LRM Consulting, Inc. (LRM). The investigation report details work that had been performed to try to define the vertical extent of petroleum hydrocarbons, soil vapor concentrations and the extent of contaminants to the south. The IRAP presents a work plan for advancing additional borings to investigate the vertical extent of petroleum hydrocarbon contamination in groundwater, monitoring wells on the southern portion of the site, one injection well and a plan to perform interim remediation using iSOC technology.

ACEH generally concurs with the proposed scope of investigation work but requests additional information before the iSOC system is tested. We request that you address the following technical comments, perform the proposed scope of work, and send us the technical reports requested below. The proposed scope of investigation work may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during field implementation. Submittal of a revised work plan is not required.

TECHNICAL COMMENTS

1. **Source Area Borings.** As per the e-mail modification to the work plan, you recommend advancing a Geoprobe boring to 60 feet to collect soil samples, then advancing two additional borings and using a hydropunch tool, collect water at 50 feet bgs and 60 feet bgs. ACEH is concerned that a Geoprobe rig will not be able to advance the borings to a depth of 60 feet and that another mobilization will need to be performed. We request that you consider using a CPT rig instead of a Geoprobe rig. If you use a Geoprobe rig and are unable to advance it to the required depth, the UST Fund may not reimburse you for a second mobilization. Also, CPT can provide continuous coring logs. Additionally, since groundwater samples collected at 40 feet contained elevated petroleum hydrocarbons, installation of wells in the deeper zone may be required at a future date. Please update your cross-sections with the information obtained during this

investigation. Include plots of the contaminant plumes on your maps, cross-sections, and diagrams in the report requested below.

2. **Box Culvert Borings.** As shown on the ETIC cross-section, the top of the box culvert is at 17 feet bgs and the bottom is approximately at 23 ft bgs. The depths of the borings you propose only go to the top of the box culvert. Groundwater is typically below this interval. Please advance each of your proposed borings to at least 25 feet to obtain groundwater samples at each location. The box culvert is only drawn to the edge of the site. Please expand the map to include the location of the culvert offsite.
3. **Downgradient Monitoring Well.** As stated in the IRAP, the contamination in this area may be coming from a different source. Please include an evaluation of whether the contamination in this area is coming from a separate source or if it is related to the USTs in the northern portion of the site in the report requested below.

Well permitting is performed through Alameda County Public Works Department. Please notify them as required before grouting the well. In addition to this, please notify ACEH 72 hours in advance and in writing (preferably e-mail), prior to initiating work at the site. Please allow at least 48 hours before developing the well to allow the grout to cure. Survey the well in accordance with Geotracker regulations and resurvey all of the wells to the NAVD 88 datum as specified in Geotracker. Wells are said to be surveyed to NAVD 29. When new well is surveyed, resurvey all wells to NAVD 88.

4. **Proposed Interim Remediation.** Interim remediation has already been performed at this site. At this point, ACEH requests that you perform a pilot test of the iSOC technology for three months rather than 6 months to determine if iSOC is effective and if scaling up the system would be an effective remediation solution or if another technology would be more effective in reducing separate phase hydrocarbons (SPH) at the site. Please provide the criteria you will evaluate to determine if iSOC is effective in the report requested below and submit it to this office for concurrence.

LRM proposes installing the iSOC oxygen diffusion well screen from 35 to 20 feet bgs. Setting the well screen at this interval will not intercept the top of groundwater or SPH in the rainy season. We are also concerned that dispersion of oxygen over 15 feet of screen will not effectively target the areas needing remediation. Also please specify the length of the microporous hollow-fiber membrane, at what depth it will be set and the oxygen flow rate. Please provide manufacturer's information on how oxygen is expected to move through the screened area to the formation to backup your proposal for the well screen intervals and iSOC placement. Please submit this information in the report requested below for concurrence.

LRM states that after the pilot test is completed, they will submit a work plan to scale-up the system. However, after the pilot test is evaluated, submittal of a CAP will be required. The CAP must be prepared in accordance with Title 23, California Code of Regulations, Section 2725 and evaluate at least three active remediation alternatives for remedying or mitigating the actual or potential adverse effects of the unauthorized release(s) besides the 'no action' and 'monitored natural attenuation' remedial alternatives. Each alternative shall be evaluated for cost-effectiveness and the Responsible Party must propose the most cost-effective corrective action and shortest

timeframes for both active remediation and to reach water quality objectives (cleanup goals). The CAP should also include, but is not limited to, a detailed description of site lithology, including soil permeability, and most importantly, contamination cleanup levels for active remediation and final cleanup goals. These can be applicable and justified ESLs or calculated, site-specific risk-based cleanup goals and water quality objectives.

5. **Soil Vapor Survey.** A soil vapor survey was performed, the results of which were submitted in LRM's investigation report and indicate that vapor intrusion is not a concern based on these results. However, Standard Operating Procedures for collecting these samples were not provided in the investigation report and in particular, no analysis for leak detection appears to have been performed. Please provide your sampling methods or specify where they are located, in the report requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Barbara Jakub), according to the schedule presented below:

- **February 5, 2009** – Soil and Water Investigation Report and additional requested information on the pilot test.

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/electronic_submittal/report_rqmts.shtml).

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) 639-1287 or send me an electronic mail message at barbara.jakub@acgov.org.

Sincerely,



Barbara J. Jakub, PG
Hazardous Materials Specialist

Mrs. Strough and Mr. Berkovich
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Enclosures: ACEH Electronic Report Upload (ftp) Instructions

cc: Mehrdad Javaherian, LRM Consulting, Inc., 1534 Plaza Lane, #145, Burlingame, CA
94010
Greggory Brant, Wendel Rosen Black and Dean, 1111 Broadway, 24th Fl., Oakland, CA
94607
Donna Drogos, ACEH, via electronic mail
Barbara Jakub, 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)