

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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March 20, 2008

Gordon Linden
1510 La Salle Avenue
Piedmont, CA 94611

George Hill
305 Sheridan Avenue
Piedmont, CA 94611

Subject: Revised Groundwater Monitoring Plan and Interim Remedial Action for Case
RO0000199, GeoTracker Global ID T0600100406, Connell Oldsmobile,
3093 Broadway, Oakland, CA

Dear Messrs Linden and Hill:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Quarterly Groundwater Monitoring Report-Fourth Quarter 2007," dated January 31, 2008, which was prepared by PANGEA Environmental Services, Inc. (PANGEA). ACEH generally concurs with the proposed scope of work and requests that you address the following technical comments, perform the proposed remedial action, and send us the technical work plan and reports described below.

TECHNICAL COMMENTS

1. **Soil and Groundwater Characterization** - Based on a review of the above-mentioned report and subject case file, the down-gradient extent of the hydrocarbon contaminant plume does not appear fully delineated. Had a groundwater sample been collected from previously installed boring CPT-16, this data gap may have been adequately addressed. However, the County's records do not indicate why a groundwater sample was not collected. Therefore, based on the available data, the down-gradient extent of the plume appears uncharacterized at this time. Please propose a scope of work to address the above-mentioned concern and submit a work plan.
2. **Remedial Action Cleanup Levels and Cleanup Goals** - We have concurred with implementation of the interim remedial action (Dual Phase Extraction with Air Sparging) proposed in the IRAP, IRAP Addendum and IRAP Addendum 2, dated November 11, 2004, December 8, 2005 and January 9, 2006, respectively, prepared by Pangea. However, the remediation proposal did not include cleanup levels and cleanup goals in accordance with the San Francisco Regional Water Quality Control Board Basin Plan and appropriate ESL guidance for all COCs and for the appropriate groundwater designation. Please note that soil cleanup levels should ultimately (within a reasonable timeframe) achieve water quality objectives (cleanup goals) for groundwater in accordance with San Francisco Regional Water Quality Control Board Basin Plan. Please submit appropriate cleanup levels; and cleanup goals in accordance with 23 CCR Section 2725, 2726, and 2727 in the plume delineation work plan by the date specified below.

3. **Groundwater Contaminant Plume Monitoring** - As requested by PANGEA, the addition of groundwater monitoring wells MW-17A, MW-17B, RW-4 and RW-2 to the groundwater monitoring plan appears reasonable and hence is approved. Please notify this Agency three (3) business day prior to scheduled groundwater sampling fieldwork and submit a technical report to SWRCB's GeoTracker website and Alameda County's FTP server according to the schedule below.
4. **Remediation System Startup** – Please notify this Agency three (3) business days prior to system startup and submit periodic remediation system summary reports according to schedule below. At a minimum, the reports should include:
 - Statement of objectives
 - Baseline data collected during earlier investigation phases that may be relevant in describing initial conditions.
 - System start-up operating procedures that were used.
 - Times that pumps and blowers were started.
 - Total elapsed time that pumps and blowers were operated
 - Dates and times that the system was shut down (either purposefully or inadvertently)
 - Pressure and vacuum measurements taken at blowers and other above ground equipment.
 - Pressure and vacuum measurements in recovery wells (before and after balancing flows and in vadose zone monitoring points, if applicable).
 - Flow rates and total cumulative volumes of extracted gas, water, and LNAPL.
 - Dilution air flow rates
 - Samples collected and analytical results obtained for influent and effluent groundwater and gas (vapor).
 - Calculations of contaminant mass recovered in water and gas streams, both total and on a well-by-well basis, if possible.
 - Corrective actions or changes in design required due to site conditions, design error or omission, or field observations during construction and start-up.
 - Recommendations for adjustments
 - Variation in actual versus anticipated operating conditions.

TECHNICAL REPORT REQUEST

Please submit a site characterization work plan and technical reports to Alameda County Environmental Health (Attention: Paresh Khatri), according to the following schedule:

- **April 28, 2008** – Work Plan for Site Characterization and Site Cleanup Goals
- **April 30, 2008** - Quarterly Monitoring & Remediation Progress Report (1st Quarter 2008)
- **July 30, 2008** - Quarterly Monitoring & Remediation Progress Report (2nd Quarter 2008)

- **October 30, 2008** - Quarterly Monitoring & Remediation Progress Report
(3rd Quarter 2008)
- **January 30, 2009** - Quarterly Monitoring & Remediation Progress Report
(4th Quarter 2008)

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).

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

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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.

I am the new case manager for your site. If you have any questions, please call me at (510) 777-2478 or send me an electronic mail message at paresh.khatri@acgov.org.

Sincerely,



Paresh C. Khatri
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Bob Clark-Riddell, PANGEA Environmental Services, Inc., 1710 Franklin Street,
Suite 200, Oakland, CA 94612
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA
94612-2032
Donna Drogos, ACEH
Paresh Khatri, ACEH
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