



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

June 21, 2012

Mr. Lee Cover (Sent via E-mail to: Lee.Cover@hanson.biz)
Hanson Aggregates
3000 Busch Road
Pleasanton, CA 94566-8403

Subject: Case File Review for Fuel Leak Case No. RO0000207 and GeoTracker Global ID T0600102092, Mission Valley Rock and Asphalt, 7999 Athenour Way, Sunol, CA 94586

Dear Mr. Cover:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted document entitled, "*Response to Alameda County Environmental Health Public Comments for Fuel Leak Case No. 207 and Geotracker Global ID T0600102092, Mission Valley Rock and Asphalt, 7999 Athenour Way, Sunol, CA 94586*," dated June 1, 2012 (Response to Comments). The Response to Comments, which was prepared by ARCADIS, addresses a request by ACEH to confirm that dewatering efforts in the region have not affected the plume at the Hanson site. In response, the depth to groundwater was measured in the 26 monitoring wells at the site on May 1, 2012. These data indicated that groundwater elevations and gradients measured on May 1, 2012 were consistent with historical groundwater elevations and hydraulic gradient. Based on these findings, ARCADIS concluded that the dewatering activities taking place for construction of the Irvington Tunnel Project do not appear to affect the site. ACEH concurs with this conclusion.

Although the dewatering project does not appear to have affected the plume at the Hanson site, the water level measurements did reveal an unexpected accumulation of non-aqueous phase liquid (NAPL) in well MW-11D. On May 1, 2012, 0.61 feet of free product was measured in well MW-11D. During two previous water level measurement events on December 24, 2010 and September 27, 2010, a "petroleum hydrocarbon-like liquid," was observed on the water level probe; however, a measurable thickness of NAPL was not reported. Prior to September 27, 2010, only a sheen had been reported during two water level events in 2007 for well MW-11D. The occurrence of 0.61 feet of NAPL is not consistent with previous data for well MW-11D. Most significantly, this occurrence of NAPL brings into question the validity of previous assumptions regarding sources of contamination for the site, the distribution and mobility of NAPL at the site, and plume stability.

TECHNICAL COMMENTS

1. **Source of NAPL in Well MW-11D.** Well MW-11D is approximately 95 feet south of the former diesel fuel USTs. NAPL has generally not been observed in well cluster MW-6S/6D, which is located approximately 35 feet south of the former diesel fuel USTs, between the former diesel USTs and MW-11D. Therefore, the source of NAPL in Well MW-11D is not apparent. We request that you investigate other potential sources of NAPL in the area of well MW-11D. Please submit a Work Plan to investigate the potential for other sources to be present in the area of MW-11D.

2. **Vertical Distribution of NAPL.** Well MW-11D is screened from approximately 15 to 20 feet bgs. Historically, the depth to water in well MW-11D has varied from 2.88 to 8.08 feet below the top of casing; therefore, water levels are generally 7 to 12 feet above the top of the well screen. The occurrence of NAPL in well MW-11D creates a question as to whether there is a significant thickness of NAPL in the gravel layer intersecting the screen interval for MW-11D to allow NAPL to enter the well 7 to 12 feet below the water table. We request that you propose investigation to evaluate whether there is a significant volume of NAPL in the gravel layer intersecting well MW-11D and evaluate the integrity of well MW-11D to not allow NAPL to enter from shallower intervals above the well screen. Please present these plans in the Work Plan requested below.
3. **Monitoring of NAPL in Well MW-11D.** In the Work Plan requested below, please consider monitoring of NAPL thickness and bail down tests for well MW-11D.

TECHNICAL REPORT REQUEST

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

- **August 28, 2012** – Work Plan

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Attachment: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

Mr. Lee Cover
RO0000207
June 21, 2012
Page 3

cc: Colleen Winey (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551
(Sent via E-mail to: cwiney@zone7water.com)

Ron Goloubow, ARCADIS, 1900 Powell Street, 12th Floor, Emeryville, CA 94608-1827 (Sent via E-mail to: Ron.Goloubow@arcadis-us.com)

Fred Stanin, Malcolm Pirnie, 1900 Powell Street, Suite 1180, Emeryville, CA 94608-1827 (Sent via E-mail to: fstanin@pirnie.com)

Jennifer Nyman, Malcolm Pirnie, 1900 Powell Street, Suite 1180, Emeryville, CA 94608-1827 (Sent via E-mail to: jnyman@pirnie.com)

Tona Henninger, Alameda County Planning Department (Sent via E-mail to: tona.henninger@acgov.org)

Brooks Loeffler, (Sent via E-mail to: brooksnsue@yahoo.com)

Donna Drogos, ACEH (Sent via E-mail to: donna.drogos@acgov.org)

Jerry Wickham, ACEH (Sent via E-mail to: jerry.wickham@acgov.org)

GeoTracker, eFile

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

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.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

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

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- 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)

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 deh.loptoxic@acgov.org
 - 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, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - 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 deh.loptoxic@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 @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) If site is a new case without an RO#, use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.