



ENVIRONMENTAL HEALTH DEPARTMENT
ENVIRONMENTAL PROTECTION
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December 16, 2010

Mr. Seung Lee
German Autocraft
350 Cherrywood Avenue
San Leandro, CA 94577

William Andrade II
PO Box 2786
Dublin, CA 94588

Sephen & Elizabeth Wilhelm
12770 Skyline Blvd
Oakland, CA 94619-3125

Subject: Modified Work Plan Approval; Fuel Leak Case No. RO0000302 and Geotracker Global ID T0600100639, German Autocraft, 301 East 14th Street, San Leandro, CA 94577-1713

Dear Responsible Parties:

Thank you for submitting the *Site Conceptual Model and Interim Remedial Action Plan*, dated October 18, 2010 and the *Quarterly Groundwater Monitoring Report – Third Quarter 2010*, dated November 9, 2010. Both reports were generated by Straus Environmental, Inc. (Stratus). The reports are appreciated and move the site forward.

Two phases of work are proposed in the Interim Remedial Action Plan (IRAP); principally an initial scope to install a soil bore to address a data gap, and that also includes the destruction of two wells, which prepares the site for the second scope of work, interim remedial action. Based on Alameda County Environmental Health (ACEH) review of these reports and 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 – mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- 1. Overdue Preferential Pathway Survey** - The previously requested preferential pathway study is overdue; this letter further affirms the need to conduct this survey, but is not an extension for this document. Previous reports indicate that numerous backyard wells may be present in the area, and that well construction details for the known and defining downgradient backyard well (141 Farrelly Drive), remain unclear. A well survey will help clarify some of these concerns and details. Please utilize both DWR and Alameda County Public Works Agency (ACPWA) as sources of well details, and additionally conduct a canvas of backyards in the vicinity. In addition, and while somewhat unlikely due to the depth of groundwater, the downgradient extent of the groundwater plume may be controlled by one or more utility conduits in Broadmoor Boulevard. Soil bores ETM-19, EMT-34, EMT-35, and well 141 Farrelly Drive all yielded non-detectable results; all are on the far side of Broadmoor Blvd, and the distribution can suggest that one or more utilities along Broadmoor may intercept the plume. Utility laterals additionally can be vapor migration pathways to the neighborhood buildings, and a utility survey should help identify the level concern for (in particular) the residential building stock in the site vicinity. The report of basements in the downgradient vicinity creates an additional level of concern relative to vapor migration. The identified utility survey in conjunction with a neighborhood canvas for basements will quickly determine the likelihood of this concern. Please refer to the previous directive letter for the details of this request.

2. Technical Comments on Additional Investigation and Well Destruction – There are several technical comments relative to this scope of work. These have previously been commented on in an email dated December 8, 2010; however, they are provided again here to formalize that response.

- a. **Well Destruction Method Modification** - Wells MW-1 and MW-4 are proposed to be destroyed / decommissioned under ACPWA permit. Destruction was proposed to be handled by pressure injection, or as otherwise modified by ACPWA. However, because the wells are in or very near the UST pit with residual contamination ACEH requests the wells be destroyed by overdrilling. This will ensure any residual contamination does not use as a conduit an incompletely removed or grouted sand pack below the IRAP removal depth.
- b. **Request for Modified Analytical Suite for B-4** - ACEH approves the installation of soil bore B-4 at the former pump island to investigate potential residual contamination with one modification - inclusion of all fuel oxygenates for the samples (MTBE, TBA, TAME, DIPE, ETBE; joining the proposed EDC & EDB). Please submit the results of this investigation in a soil and groundwater investigation report by the date identified below.
- c. **Request for Additional Soil Bore** – ACEH also requests the installation of a second bore (presumed as B-5) to investigate the former waste oil UST location. The UST removal report does not clearly document if waste oil tank removal soils were exported from the site, and are likely to have been reused in the excavation if the fuel UST excavation is used as a guide. Soil disposal manifests have also not been located for the site and tend to support onsite reuse of all soil stockpiles. The UST removal report also indicates an oily odor in the excavation. While it is noted that soil analytical at the base of the excavation was nondetectable, the removal report also notes staining on the east side of the excavation at 3 – 5 ft bgs, consequently the potential for vertical migration exists. ACEH requests that the sampling and analytical protocol follow that for B-4, with the addition of two modifications - inclusion of VOCs by EPA 8260 with all fuel oxygenates as noted above, and use of a TPH fingerprint analysis to better understand the TPH carbon range present. Should elevated TPH be detected, standard waste oil constitutes should additionally be requested. Please submit the results of this investigation in a soil and groundwater report by the date identified below.

3. Technical Comments on Interim Remedial Action – There are several technical comments relative to the proposed remedial excavation scope of work. Please be aware, the IRAP has not received final approval, pending additional data and analysis from soil bores B-4 and B-5 requested above.

- a. **Depth of Soil Removal** – In the IRAP Stratus proposes to initially define the depth of soil removal in the former UST area using a photoionization detector (PID) as a screening tool, with further excavation from 14 feet below grade surface (bgs) to the anticipated maximum proposed depth of 16 feet dependent on the presence of PID units over 1,000 ppm at 14 feet bgs. As this is the presumed source area, ACEH requests that the final depth of excavation be based on significantly reduced concentrations, or physical limitations. It is understood that additional interim remedial efforts are currently being generated and are proposed to be handled by Dual Phase Extraction (DPE).
- b. **Soil Disposal** – The IRAP appears to indicate that all excavated soil is anticipated to be disposed offsite at various landfill options. If reuse of any soil is anticipated onsite, ACEH requests that the San Francisco RWQCB Draft *Technical Reference Document, Characterization and Reuse of Petroleum Hydrocarbon Impacted Soil as Inert Waste* dated October 20, 2006, be utilized to guide and establish required sampling intervals.
- c. **Excavation Soil Sampling Intervals** – The IRAP proposes to collect sidewall samples at a depth of 7 feet bgs, based on the original bottom burial depth of the gasoline USTs, as well

as representing an approximate midpoint in the anticipated excavation removal depth. The IRAP also proposes collection of the sidewall samples at 25 foot linear sampling intervals, and bottom samples in a grid pattern on approximately 25-foot centers. Based on a 25 by 50 to 60 foot excavation, this approach is reasonable; however, ACEH requests the soil samples be additionally authoritatively placed at signs of contamination (field screened with a PID, other appropriate field instrument, signs of odor, or staining).

- d. **Analytical Protocols** – The IRAP proposes to analyze soil for GRO by Modified EPA Method 8015, and BTEX, 1,2-DCA, and EDB by EPA Method 8260B. ACEH additionally requests inclusion of MTBE and all fuel oxygenates as noted above. Backfill soil (presumed to be imported) is proposed to be analyzed for CAM17 and a full EPA Method 8260 VOC scan. ACEH additionally requests analysis for a TPH with a TPH fingerprint scan to preclude import of TPH impacted soils.
 - e. **Potential Additional Areas for Remediation** – This letter approves installation of bores B-4 and B-5 to investigate two areas of concern not adequately understood – the pump island and the waste oil UST excavation. Both areas may require remedial actions depending on the pending results. Please incorporate these areas in planned interim remedial actions in the document requested below, if appropriate.
4. **GeoTracker Compliance** – A review of the State Water Resources Control Board's (SWRCB) GeoTracker website indicates the site is not in compliance with upload requirements (It is noted however that changes may be underway). In particular the following areas were noted to be deficient - wells have not been surveyed to Geotracker standards, the majority of EDFs, GEO_WELLS, and other required uploads have not been uploaded.

Please be aware that pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. Also, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude to sub-meter accuracy using NAD 83. A California licensed surveyor may be required to perform this work. Additionally, pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3893, 3894, and 3895, beginning July 1, 2005, the successful submittal of electronic information (i.e. report in PDF format) shall replace the requirement for the submittal of a paper copy. Please upload all required submittals to GeoTracker and ACEH's ftp server by the date specified below. Electronic reporting is further described in Attachment 1 to this letter.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH, according to the following schedule:

- **January 31, 2010** – Preferential Pathway Study
- **February 21, 2011** – Soil and Groundwater Investigation Report, with any additional appropriate modifications to the interim remedial action plan.
- **90 Days after IRAP Approval** – Report of Interim Remedial Actions

Responsible Parties
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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.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark E. Detterman, PG, CEG
Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations
Electronic Report Upload (ftp) Instructions

cc: Kasey Jones, Stratus Environmental, Inc, 3330 Cameron Park Drive, Suite 550, Cameron Park, CA 95682, (sent via electronic mail to kaseyjones@stratusinc.net)

Donna Drogos, ACEH, (sent via electronic mail to donna.drogos@acgov.org)
Mark Detterman, ACEH, (sent via electronic mail to mark.detterman@acgov.org)
Geotracker, e-File

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.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.

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 dehloptoxic@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 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 @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.