



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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April 28, 2014

Mr. Seung Lee
German Autocraft
301 East 14th Street
San Leandro, CA 94577

William Andrade II
Address Unknown

Sephen & Elizabeth Wilhelm
Address Unknown

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 Mr. Lee:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including the *Technical Memo / Work Plan*, dated March 5, 2014, and the *Semi-Annual Groundwater Monitoring Report – Fourth Quarter 2013 and First Quarter 2014*, dated April 7, 2014. The reports were prepared and submitted on your behalf by Stratus Environmental, Inc (Stratus). Thank you for submitting the reports. The work plan proposes the installation of well MW-15 to replace wells MW-1 and MW-4 in the plume core zone in order to determine the success of the remedial excavation, and to determine current groundwater concentrations in the source area; the installation of two offsite soil bores / hydropunch sample locations in order to define the groundwater gradient to the west, the installation of permanent vapor wells at eight locations on- and off-site to collect shallow soil samples and in an effort to determine vapor sampling reproducibility, and, if needed, the installation of three ozone injection wells, and injection of ozone, in the source zone area.

As discussed extensively in the previous directive letter (September 30, 2013) ACEH evaluated site data to determine if the site can be closed under the State Water Resources Control Board's (SWRCBs) Low-Threat Closure Policy (LTCP). Based on ACEH staff review, we determined that the site failed to meet the LTCP General Criteria d (Free Product), e (Site Conceptual Model), f (Secondary Source Removal) and the Media-Specific Criteria for Groundwater, the Media-Specific Criteria for Vapor Intrusion to Indoor Air, and the Media-Specific Criteria for Direct Contact (please see Geotracker for a copy of the LTCP checklist, and the Technical Comments below). Based on discussions in a meeting held October 29, 2014, ACEH is in agreement that General Criteria f (Secondary Source Removal) and Media-Specific Criteria for Direct Contact and Outdoor Air have been satisfied.

Based on ACEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Work Plan Modifications** – The referenced work plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests several modifications to the approach.
 - a. **Work Phases** – ACEH is in general agreement that the proposed scope of work appears appropriate for the subject site; however, it also appears appropriate to phase work in order

to assess the need for additional data collection after the first phase data has been evaluated. In particular it appears that the following items can be staged:

- i. Offsite Vapor Wells** – It appears that installation of offsite vapor wells at VP-3 to VP-6 can be held pending the collection and evaluation of onsite soil vapor and shallow soil analytical data. Contaminant concentrations in well MW-15 will also be evaluated to assess the need for offsite vapor wells.
 - ii. Injection Wells** – As proposed, it appears appropriate to hold the installation of onsite injection wells IW-1 to IW-3 pending a determination that corrective actions are required, based in part on the installation of well MW-15 and determination of contaminant concentrations in the well, and onsite vapor wells VP-1, VP-2, VP-7, and VP-8.
- b. Soil Sample Collection and Analysis** – The work plan proposes the collection of soil samples at five foot depth intervals for all deeper soil bores. Please additionally collect and analyze soil from significant changes in lithology, signs of contamination (odor, discoloration, PID responses, etc.), and at the vadose zone – groundwater interface.
- c. Additional Vapor Well Request** – It appears appropriate to install an additional vapor well in proximity to the onsite building in order to determine if the risk of vapor intrusion to indoor air is present to the building at the site. Because atypical vapor concentrations were present at SV-1 and SV-8, and atypical soil and groundwater concentrations (relative to the source location) were encountered in well MW-2, it appears appropriate to investigate the potential for vapor intrusion to the building along the southwestern edge of the building, unless contra indications are present.
- d. Vapor Sampling Protocols** – The proposed soil vapor sampling protocols appear to incorporate Department of Toxic Substances (DTSC) soil vapor sampling guidelines; however, do not mention that the tracer gas will be injected into a shroud to maintain elevated tracer gas concentrations in the vicinity of the sampling train, or that a shroud tracer gas concentration will be analyzed for as DTSC guidelines indicate.

ACEH requests that the bentonite be hydrated prior to emplacement in the borehole due to experience with infiltration of gasoline generator exhaust gases into vapor samples with the consequent significant skewing of the data. The use of a thinner layer of dry bentonite below the hydrated bentonite may prevent infiltration of the sand by the bentonite. Alternatively, if an alternative power source is used in-place hydration of the bentonite may be suitable.
- e. Vapor Sample Atmospheric Gas Sample Analysis** - ACEH additionally requests the collection and analysis of atmospheric gases (oxygen, nitrogen, and carbon dioxide) and methane from the vapor probe. This data allows a better understanding of the subsurface vapor environment, and the quality and representativeness of the vapor sample collection effort.
- f. Vapor Probe Installation Depth** – The LTCP process utilizes vapor samples that have been collected at a depth 5 feet below the foundation. Please determine and communicate the foundation depths for the onsite and offsite building to the southwest. Please ensure that the vapor probes are installed 5 feet below the bottom of the building foundations.
- g. Well Survey And Neighborhood Canvas** – The owner of the well at 141 Farrelly Drive (used to define the downgradient extent of the groundwater plume) reports that at least four unknown residential water supply wells are in the local neighborhood and are not documented by the previous survey and canvas. Please utilize Alameda County Public Works Agency (ACPWA) and State Department of Water Resources (DWR) data bases in the well survey as the data sets are not always similar.
- h. Ozone Injection Pilot Test** – This Technical Comment is intended to clarify that ozone injection is not approved in this directive letter. As stated in the work plan, ozone injection is contingent upon the determination of a need for the installation of injection wells IW-1 to IW-3

(see Technical Comment 1aⁱⁱ above). While not labeled as a pilot test, ACEH must consider this proposed potential action to be a pilot test, and as such further control documents will be required prior to approval of this phase of work, if required.

- 2. Groundwater Monitoring** – Please continue groundwater monitoring on a Semi-Annual basis, and sub reports by the date identified below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below, according to the following schedule:

- **July 18, 2014** – Site Investigation Report
File to be named: RO302_SWI_R_YYYY-mm-dd
- **October 24, 2014** – Third Quarter 2014 Semi-Annual Groundwater Monitoring Report
File to be named: RO302_GWM_R_YYYY-mm-dd

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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address does not appear on the cover page of this notification, ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

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
Senior Hazardous Materials Specialist

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

cc: Trevor Hartwell, Stratus Environmental, Inc, 3330 Cameron Park Drive, Suite 550, Cameron Park, CA 95682; (sent via electronic mail to: thartwell@stratusinc.net)

Dilan Roe (sent via electronic mail to dilan.roe@acgov.org)
Mark Detterman, ACEH, (sent via electronic mail to mark.detterman@acgov.org)
Geotracker, Electronic File

Attachment 1

Responsible Party(ies) Legal Requirements/Obligations

REPORT/DATA REQUESTS

These reports/data are being requested pursuant to Division 7 of the California Water Code (Water Quality), Chapter 6.7 of Division 20 of the California Health and Safety Code (Underground Storage of Hazardous Substances), and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations (Underground Storage Tank Regulations).

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (Local Oversight Program [LOP] for unauthorized releases from petroleum Underground Storage Tanks [USTs], and Site Cleanup Program [SCP] for unauthorized releases of non-petroleum hazardous substances) require submission of reports in electronic format pursuant to Chapter 3 of Division 7, Sections 13195 and 13197.5 of the California Water Code, and Chapter 30, Articles 1 and 2, Sections 3890 to 3895 of Division 3 of Title 23 of the California Code of Regulations (23 CCR). Instructions for submission of electronic documents to the ACEH FTP site are provided on the attached "Electronic Report Upload Instructions."

Submission of reports to the ACEH FTP site is in addition to requirements for electronic submittal of information (ESI) to the State Water Resources Control Board's (SWRCB) Geotracker website. In April 2001, the SWRCB adopted 23 CCR, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1 (Electronic Submission of Laboratory Data for UST Reports). Article 12 required electronic submittal of analytical laboratory data submitted in a report to a regulatory agency (effective September 1, 2001), and surveyed locations (latitude, longitude and elevation) of groundwater monitoring wells (effective January 1, 2002) in Electronic Deliverable Format (EDF) to Geotracker. Article 12 was subsequently repealed in 2004 and replaced with Article 30 (Electronic Submittal of Information) which expanded the ESI requirements to include electronic submittal of any report or data required by a regulatory agency from a cleanup site. The expanded ESI submittal requirements for petroleum UST sites subject to the requirements of 23 CCR, Division, 3, Chapter 16, Article 11, became effective December 16, 2004. All other electronic submittals required pursuant to Chapter 30 became effective January 1, 2005. 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, 7835, 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, late 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 SCP)	REVISION DATE: July 25, 2012
	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 (petroleum UST and SCP) 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.