



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

August 9, 2013

Hooshang Hadijian
Dublin Auto Wash
1821 Castle Gate Road.
Walnut Creek, CA 94595

Iver and Janice Hilde
c/o Lange Enterprises
6500 Dublin Boulevard., #202
Dublin, CA 94568

Aaron Costa
Chevron Corporation
6111 Bollinger Canyon Road, Room 3660
San Ramon, CA 94583

Subject: Fuel Leak Case No. RO0000304 and GeoTracker Global ID T0600100355, Chevron #9-2582, 7240 Dublin Boulevard, Dublin, CA 94568

Dear Mr. Hadijian, Mr. Costa, and Mr. and Ms. Hilde:

Thank you for the recently submitted document entitled, *Enhanced Bioremediation Pilot Test Workplan* (Workplan), dated June 14, 2013, and prepared by Pangea Environmental Services, Inc. (Pangea) on behalf of Mr. Hadijian for the subject site. The Workplan was prepared in response to ACEH's request to update the site conceptual model (SCM) prior to implementation of the proposed corrective actions presented in Pangea's *Corrective Action Plan Addendum*, (CAP Addendum) dated March 18, 2013, and presents details on a proposed bio-organic catalyst (BOC) injection and biosparging pilot test to provide additional data about potential submerged free product and secondary source material.

ACEH generally concurs with the proposed pilot test, and requests that you address the technical comments below and implement the proposed scope of work.

TECHNICAL COMMENTS

1. Monitoring During Pilot Test – Pangea proposes to perform the pilot testing in existing wells MW-3A and MW-6A. The scope of work includes measuring background conditions in the two wells to establish pre-pilot testing groundwater conditions, injecting BOC into the wells followed by flushing/dispersion with water, performing a biosparge air injection test in each well to evaluate the effectiveness of the technology for full scale implementation and to help distribute and activate the BOC for hydrocarbon desorption and bioattenuation, daily extracting/pumping of the groundwater and injected BOC from the wells for a period of 5 to 10 days, monitoring for free product and increased dissolved hydrocarbon concentrations (and residual BOC) in the wells following extraction, and performing routine groundwater monitoring of the two wells after 2 to 4 weeks of equilibration.

ACEH requests that additional site well MW-7A be monitored during the pilot test to monitor potential risk to onsite receptors due to migration of hydrocarbons induced by the enhanced biosparging. Additionally, if hydrocarbon migration is observed during the enhanced biosparging event, ACEH requests that the contingency measures presented in the CAP

Addendum be implemented including short-term dual phase extraction using a vacuum truck, if necessary.

2. **Bioremediation Pilot Test Report**– Please present the results and an evaluation of the biosparging and bioremediation performance in a Bioremediation Pilot Test Report. Please support recommendations for implementing the corrective actions presented in the CAP Addendum with an Updated Site Conceptual Model as previously requested in ACEH's letter dated May 28, 2013 that focuses on the complex groundwater flow and contaminant transport at the site due to the combined effects of vertical gradients, preferential flow pathways (particularly the city sewer line located beneath Dublin Boulevard), and possible influences on the gradient due to the San Ramon Creek/Flood Control Channel, on-site car wash, and irrigation practices.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Dilan Roe), according to Attachment 1 and the following naming convention and schedule:

- **December 6, 2013** – Bioremediation Pilot Test Report
(File to be named: SWI_R_yyyy-mm-dd)
- **December 6, 2013** – Updated Site Conceptual Model
(File to be named: SCM_R_yyyy-mm-dd)

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 567-6767 or send me an electronic mail message at dilan.roe@acgov.org.

Sincerely,

Dilan Roe
Program Manager – Local Oversight Program

Enclosure: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations &
ACEH Electronic Report Upload (ftp) Instructions

cc: Bob Clark-Riddell, Pangea Environmental Services, Inc., 1710 Franklin Street, Suite 200,
Oakland, CA 94568
Colleen Winey, Zone 7 Water Agency, (Sent via E-mail to: cwiney@zone7water.com)
Dilan Roe, ACEH (Sent via E-mail to: dilan.roe@acgov.org)
GeoTracker
File

ATTACHMENT 1

**Responsible Party(ies) Legal Requirements/Obligations
& ACEH Electronic Report Upload (ftp) Instructions**

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 .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 <://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 .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.