

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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January 24, 2008

Administrator Whitney Newland
Estate of Crandal Mackey
C/o Weldon & Hass
205 East Anapamu Street
Santa Barbara, CA 93101

Subject: SLIC Leak Case No. RO0000311 and Geotracker Global ID T0600102204, Call Mac Transportation, 461 McGraw Avenue, Livermore, CA 94550

Dear Whitney Newland:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above-referenced site including the recently submitted documents entitled, "Further Site Investigation and Remedial Action Report, 461 McGraw Avenue, Livermore, California 94550," dated January 14, 2008 and "PCE Groundwater Remedial Action Work Plan, 461 McGraw Avenue, Livermore, California 94550," dated January 21, 2008. Both reports were prepared on your behalf by Environmental Investigation Services, Inc. The Further Site Investigation and Remedial Action Report presents the results of excavation and disposal of arsenic-impacted building pad soils, excavation and disposal of petroleum-impacted soils in the DO3 area, decommissioning of a former water supply well, groundwater monitoring well installation, and soil vapor sampling. The PCE Groundwater Remedial Action Work Plan proposes installing three groundwater monitoring wells, advancing one boring for assessing the vertical extent of contamination, and procedures for removing PCE-contaminated soil and groundwater.

The proposed scope of work and methods for advancing one soil boring in the area of former boring B-26 for vertical delineation and installing three monitoring wells in the area of the proposed remedial excavation are acceptable. However, we request that proposed monitoring well MW-6 be moved to a location north of boring B-26 and outside the proposed excavation as discussed in technical comment 2. The proposed soil boring and monitoring well installation may be implemented provided that technical comment 2 below is addressed during monitoring well installation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed.

The proposed remedial excavation was discussed during a meeting held on January 23, 2008 between Jerry Wickham and Donna Drogos of ACEH, John Mahoney of Antrim Construction, Scott Fooks of Weldon and Hass, and Peter Littman and Allen Waldman of Environmental Investigation Services. As discussed during the January 23, 2008 meeting, we do not object in concept to the proposed excavation. However, we request that you review the proposed vertical extent of contamination using results from proposed boring B-36 and address the technical comments below regarding the excavation prior to submitting a Remedial Excavation Work Plan.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS ON REMEDIAL ACTION WORK PLAN

1. **Proposed Soil Boring B-36 for Assessment of Vertical Extent of Contamination.** The proposed scope of work and methods for proposed soil boring B-36 are acceptable. Please present the results from soil boring B-36 in the Remedial Excavation Work Plan requested below.
2. **Proposed Monitoring Wells.** The proposed scope of work and methods for installing three monitoring wells in the area of the proposed remedial excavation are acceptable. However, we request that proposed monitoring well MW-6 be moved to a location north of boring B-26 and outside the proposed excavation. As discussed during the January 23, 2008 meeting, the wells may be installed either prior to or following the remedial excavation in order to avoid damage during excavation activities. Results from installation and sampling of the monitoring wells are to be presented in the Remedial Excavation Report requested below.
3. **Extent of Excavation.** As discussed during the January 23, 2008 meeting, we request that you extend the excavation using trenches to include the vicinity of soil gas sampling locations where elevated concentrations of PCE were detected in soil gas. The vertical extent of excavation is to be reviewed based on results from proposed boring B-36. In addition, please include one figure in the Remedial Excavation Work Plan that shows the outline of planned buildings overlain on the soil gas sampling locations and analytical data. Please include plans for the trenches, the requested site figure, and a discussion of the vertical extent of excavation in the Remedial Excavation Work Plan requested below.
4. **Screening and Possible Reuse of Vadose Zone Soils.** As discussed during the January 23, 2008 meeting, please expand the discussion regarding screening, sampling, and possible reuse of vadose zone soils as fill material. Please include these plans in the Remedial Excavation Work Plan requested below.

TECHNICAL COMMENTS ON FURTHER SITE INVESTIGATION AND REMEDIAL ACTION REPORT

5. **Excavation of Building Pad Fill.** Approximately 377 tons of arsenic-impacted soil was removed from the building pad. We concur that no further excavation of arsenic-impacted soil from the building pad area is required.
6. **Excavation of DO3 Area.** Based on the results of confirmation soil sampling in the DO3 area, the extent of residual petroleum contamination in soil is minimal. No further excavation is required in the DO3 area.

TECHNICAL REPORT REQUEST

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

- **March 28, 2008** – Remedial Excavation Work Plan
- **90 days following ACEH approval of Remedial Excavation Work Plan** – Remedial Excavation Report

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 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

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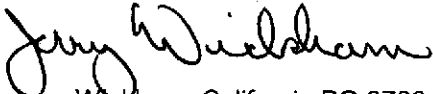
appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this case meet this requirement.

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.

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
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Cheryl Dizon, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway
Livermore, CA 94551

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street,
Pleasanton, CA 94566

John Rigter, Livermore-Pleasanton Fire Department, 3560 Nevada Street
Pleasanton, CA 94566

Peter Littman, Environmental Investigation Services, Inc., 170 Knowles Drive, Suite 212,
Los Gatos, CA 95032

Scott Fooks, Weldon & Hass, 205 East Anapamu Street, Santa Barbara, CA 93101

John Mahoney, Antrim Construction, 1635-A Chestnut Street, Livermore, CA 94551

Donna Drogos, ACEH
Jerry Wickham, ACEH
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