



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

August 22, 2012

Manwel and Samira Shuwayhat
c/o Gus Shuwayhat
54 Wolfe Canyon Road
Kentfield, CA 94904
(Sent via E-mail to: Gus.Shuwayhat@thomsonreuters.com)

Subject: Case File Review for Fuel Leak Case No. RO0000324 and GeoTracker Global ID T0600102287, Livermore Gas and Mini-mart, 160 Holmes Street, Livermore, CA 94553

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above referenced site including the recently submitted document entitled, "*Work Plan for Additional Soil and Groundwater Remediation for Fuel Leak Case No. RO0000324, Livermore Gas and Mini Mart, 160 Holmes Street, Livermore, California,*" dated July 16, 2012 (Work Plan). The Work Plan, which was prepared on your behalf by Allterra Environmental, Inc., presents plans for additional use of in-situ chemical oxidation (ISCO) at the site that includes installation of an additional injection well and pressure injection of oxidant.

Prior to additional ISCO at the site, we request that you conduct the additional sampling discussed in technical comment 1 to confirm that geochemical parameters are stabilizing and that hexavalent chromium concentrations have decreased to acceptable levels. If the confirmation sampling demonstrates that geochemical parameters are stabilizing and that hexavalent chromium concentrations have decreased to acceptable levels, submittal of a Revised Work Plan will be requested. The Revised Work Plan, if requested, would need to address technical comments 2 through 5.

TECHNICAL COMMENTS

1. **Groundwater Monitoring.** The Work Plan concludes that no adverse effects were revealed during any of the previous remedial sampling events. However, review of the remedial sampling events indicates that the concentration of hexavalent chromium in groundwater from EW-3 increased from <0.2 micrograms per liter ($\mu\text{g/L}$) in the groundwater sample collected during the baseline sampling event on April 11, 2011 to 110 $\mu\text{g/L}$ during the last remedial sampling event on June 30, 2011. The draft public health goal for hexavalent chromium in drinking water (OEHHA 2011) is 0.06 $\mu\text{g/L}$. The concentration of hexavalent chromium has not been monitored since June 30, 2011. Review of field conductivity data from groundwater monitoring events since June 30, 2011 indicates that conductivity remains elevated in EW-3. Field conductivity also increased during the June 13, 2012 sampling event in groundwater from well MW-7A. Confirmation that geochemical parameters are stabilizing and that hexavalent chromium concentrations have decreased to acceptable levels is required prior to additional ISCO events. Therefore, we request that you sample and analyze groundwater from each of the wells sampled during the remedial sampling events for the same analytes used during the remedial sampling events. Please present the results in the Third Quarter 2012 Groundwater Monitoring Report requested below. The future use of ISCO at this site will be contingent upon these results.

2. **Location of Injection Wells and Expected Results.** The previous use of in-situ chemical oxidation (ISCO) at this site used direct-push injections spread throughout the source area. It is not clear why the use of wells EW-3 and EW-1 as injection wells is expected to complete the source area remediation. The radius of influence for injection wells is typically on the order of 10 to 25 feet. A significant scope of investigation was conducted within the source area in 2008 to define the horizontal and vertical extent of contamination. A review of the results from the 2008 investigation indicates that the highest concentrations of MTBE in soil were detected at locations GP-14 and GP-9. We request that you define the expected radius of influence for the proposed injections and plot this radius on a map showing the results from the 2008 investigation to evaluate whether the treatment is expected to impact areas with the highest residual contamination. In the Revised Work Plan requested below, please add injection wells where necessary or propose an alternate injection method to achieve optimal results.
3. **Depth of Injection Wells.** We do not concur with the proposal to install injection well EW-3B with a screen interval from 15 to 40 feet bgs. If injection wells are to be used, they must target the vertical zones of contamination and not inject oxidant into the vadose zone or into uncontaminated zones. In order to define the vertical zone where the injections are proposed, we request that you prepare cross sections that show the site stratigraphy, available soil and groundwater data, previous injection locations, and proposed injection wells with screen intervals. Please present the cross sections and your proposal in the Revised Work Plan requested below.
4. **Injection Pressures.** In the Revised Work Plan requested below, please present detailed information regarding the expected injection pressures, methods for pressure injection, and the rationale for use of pressure injection.
5. **Option 2.** We do not concur with the proposed use of groundwater extraction and treatment as proposed in Option 2. addition to the proposed parameters of vacuum applied at extraction well

TECHNICAL REPORT REQUEST

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

- **November 16, 2012** – Third Quarter 2012 Groundwater Monitoring Report
File to be named: GWM_R_YYYY-mm-dd
- **Contingent upon results of Third Quarter 2012 confirmation sampling** – Revised Work Plan
File to be named: WP_R_YYYY-mm-dd

Manwel and Samira Shuwayhat
RO0000324
August 22, 2012
Page 3

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org. Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

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

cc: Danielle Stefani, Livermore Pleasanton Fire Department, 3560 Nevada St, Pleasanton, CA 94566
(Sent via E-mail to: dstefani@lpfire.org)

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

Joe Mangine, Allterra Environmental, Inc., 849 Almar Avenue, Suite C, No. 281, Santa Cruz, CA 95060 (Sent via E-mail to: joe@allterraenv.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, 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.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.