

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

sent
01-09-06

January 6, 2006

Mr. Scott Anderson
Dublin Toyota
6450 Dublin Ct.
Dublin, CA 94568

Mr. Nolan Davis
Nolan M. & Vella E. Davis Trust
50 Oak Court, Ste. 160
Danville, CA 94526-4039

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

Dear Messrs. Anderson and Davis:

Subject: Fuel Leak Case RO0000333, Dublin Toyota/Pontiac, 6450 Dublin Ct.,
Dublin, CA 94568

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the subject site including the June 20, 2005 *Soil and Water Investigation Summary of Findings* prepared by Gribi Associates. This report provides soil and groundwater sample results, used to determine the lateral and vertical extent of fuel contaminants and oxygenates at this site. The subsurface geology has also been determined through the logs of the borings. Your consultant concludes from the investigation that the fuel oxygenate, MTBE, has migrated laterally in the southwest direction in a shallow water bearing zone termed the "A" zone and then migrated further southwest in a deeper zone, termed the "B" zone. The extent of MTBE migration in the deeper zone was not able to be determined and is limited by the proximity of Interstate 580. The report also proposes a set of shallow and deep monitoring wells to monitor the two identified plumes. We generally concur with this recommendation. We request you address the following technical comments and submit the technical reports specified below.

TECHNICAL COMMENTS

1. The specific construction of the proposed wells has not been stated and should be determined based upon observations obtained during their installation. However, the following should be observed; the shallow wells should not extend beyond 20' bgs and the screen intervals should not exceed a maximum length of 10'.
2. The lateral and vertical extent of the MTBE plume has not been determined. After monitoring of the newly installed wells, a recommendation must be made to address this issue.
3. We request that you perform the Fluid/Vapor recovery from the extraction wells installed in the former tank pit. Please confirm your schedule for your extraction events. At the time of the extraction, we request that the other wells be monitored for water level and induced vacuum. Your extraction report should include tabulated data of vapor flow rates, water flow rates, water level measurements and induced vacuum in nearby wells. It should also include an estimated total mass removal,

removal rates at applied vacuums, drawdown in observation wells and estimated radius of influence.

4. The newly installed wells should be incorporated into the quarterly monitoring program for your site.

Please submit the technical reports according to the following schedule.

- March 15, 2006- 1st QMR 2006
- June 15, 2006- 2nd QMR 2006
- September 15, 2006- 3rd QMR 2006
- December 15, 2006- 4th QMR 2006
- January 15, 2006- Fluid/Vapor recovery schedule. Report should be included in the immediate following QMR.

ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, 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).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at barney.chan@acgov.org.

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

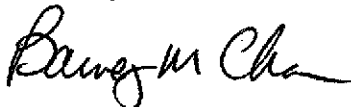
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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.

If you have any questions, please call me at (510) 567-6765.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: files, D. Drogos

Mr. Jim Gribi, Gribi Associates, 1350 Hayes St., Ste. C-7, Benicia, CA 94510
Shari Knieriem, SWRCB, P.O. Box 944212, Sacramento, CA 94244-2120
Matt Katen, Zone 7 Water District, QIC 80201

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 03-09-05

March 9, 2005

Scott Anderson
Dublin Toyota/Pontiac
6450 Dublin Ct.
Dublin, CA 94568

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-8577
(510) 567-6700
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Nolan Davis
Nolan M. & Velia E. Davis Trust
50 Oak Court, Ste. 160
Danville, CA 94526-4039

Subject: Fuel Leak Case No. RO0000333, Dublin Toyota/Pontiac, 6450 Dublin Court, Dublin, California – Workplan Approval

Dear Mssrs. Anderson and Davis:

Alameda County Environmental Health (ACEH) has reviewed your January 3, 2005, *Revised SWI Workplan* prepared by Gribi Associates for the above-referenced site. We concur with your workplan provided the following conditions are met:

1. The final report will include an isoconcentration map for each depth-interval evaluated in the investigation and two cross-sections (one along the plume axis and a second perpendicular to the apparent groundwater flow direction).
2. If deemed necessary by your geologist or engineer to fully define the vertical and lateral extent of contamination, additional soil or groundwater samples will be collected as part of the current investigation efforts. ACEH will be informed via telephone or email of any additions to the sampling and analysis plan. Any additional work will follow the workplan-specified procedures. Dynamic investigations are consistent with USEPA protocol for expedited site assessments, which are scientifically valid and offer a cost-effective approach to fully define a plume and to help progress a case toward closure.
3. 72-hr advance written notification (email preferred) will be provided to ACEH prior to field sampling activities.

Please implement the proposed investigation and submit technical reports following the schedule below. In addition, we request that you address the following technical comments in your report.

TECHNICAL COMMENTS

1. Final Soil and Water Investigation Report

Please compile summary figures and cumulative data tables presenting all historical sampling locations and analytical data. We request two tables, one for soil and one for groundwater, that present all data for the site including sample identification, sampling dates, sample depths, depth to water measurement, analytical results, etc. To simplify reporting, please report soil results in mg/kg (ppm) and groundwater results in ug/L (ppb). Please update your isoconcentration maps (depth and contaminant specific) and prepare cross-sections to include the data from the current investigation, as well as all historical site lithologic and contaminant distribution data. To substantiate interpretations made in your cross-sections, please compile and submit copies of all historical boring logs for the site. As part of your final investigation report, we request that you include recommendations for any necessary work to complete

characterization of the groundwater contamination, and other appropriate corrective action to progress this case towards regulatory closure. This request is made in the interest of minimizing the number of iterations of field work performed at leaking UST sites, and to thereby reduce both the time period and costs for a case to progress to closure. Please include the summary data tables, figures, boring logs and recommendations in the investigation report requested below.

2. Interim Remedial Action

In your October 18, 2004 report, Gribi states that a workplan was submitted to conduct "Aggressive Fluid Vapor Recovery;" however, we did not receive the workplan. The December 9, 2002 *Report of Groundwater Monitoring Activities* recommends preparation of a workplan to complete the interim remediation. We concur with this recommendation. In our December 3, 2004 letter, we requested that you propose appropriate interim remediation tasks and a schedule for this work in an interim remedial action plan by January 18, 2005. We have not yet received any response to this request.

REPORT REQUEST

Please submit your *Soil and Water Investigation Report*, which addresses the comments above by **June 8 2005**. ACEH makes this request pursuant to California Health & Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2778 outline the responsibilities of a responsible party for an unauthorized release from an UST system, and require your compliance with this request.

Professional Certification and Conclusions/Recommendations

The California Business and Professions Code (Sections 6735 and 7835.1) requires that workplans 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.

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.

UNDERGROUND STORAGE TANK CLEANUP FUND

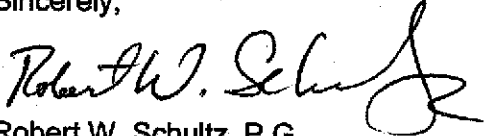
Please note that delays in investigation, late reports or enforcement actions by ACEH may result in you becoming ineligible to receive cleanup cost reimbursement from the state's Underground Storage Tank Cleanup Fund (senate Bill 2004).

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 County District Attorney or other appropriate agency, for enforcement. California Health and Safety Code, Section 25299.76 authorizes ACEH enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

Please call me at (510) 567-6719 with any questions regarding this case.

Sincerely,



Robert W. Schultz, P.G.
Hazardous Materials Specialist

cc: James Gribi, Gribi Associates, 1350 Hayes St., Ste. C-7, Benicia, CA 94510
Shari Knieriem, P.O. Box 944212, Sacramento, CA 94244-2120
Matt Katen, Zone 7 Water District, QIC 80201
Donna Drogos, ACEH
Robert W. Schultz, ACEH

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT
12-6-04

ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
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(510) 567-6700
FAX (510) 337-9335

December 3, 2004

Scott Anderson
Dublin Toyota/Pontiac
6450 Dublin Ct.
Dublin, CA 94568

Nolan Davis
Nolan M. & Velia E. Davis Trust
50 Oak Court, Ste. 160
Danville, CA 94526-4039

Subject: Fuel Leak Case No. RO0000333, Dublin Toyota/Pontiac, 6450 Dublin Court,
Dublin, California – Request for Revised Workplan

Dear Mssrs. Anderson and Davis:

Alameda County Environmental Health (ACEH) has reviewed your October 18, 2004 *Report of Groundwater Monitoring and SWI Workplan Addendum* prepared by Gribi Associates and the case file for the above-referenced site. Your revised workplan does not adequately respond to ACEH's January 21, 2003 or August 11, 2003 written requests. Accordingly you are out of compliance with ACEH directives. Pursuant to the UST Cleanup Fund's October 4, 2004 letter, you are being removed from the priority list as a result of your failure to comply with ACEH directives. To be eligible for cost reimbursement from the Fund, we encourage you to promptly comply with our directives and to contact the Fund as directed in the October 4, 2004 letter. Please submit a revised workplan for soil and groundwater investigation which addresses the technical comments below.

TECHNICAL COMMENTS

1. Soil and Water Investigation

We have repeatedly requested that you propose investigation tasks to define the lateral and vertical extent of contamination in groundwater. The site is located within an area designated for municipal water supply, and Gribi's October 18, 2004 well survey (Appendix C) identified 5 water supply wells within the site vicinity. Gribi proposes four CPT boring pairs and collection of two depth discrete groundwater samples from each location. Using the results from the CPT investigation, Gribi anticipates installation of two to three monitoring wells.

Based on i) the MTBE concentrations detected in the existing monitoring wells, ii) the locations proposed by Gribi in the May 7, 2003 workplan, and iii) active use of the groundwater basin for drinking water supply, the proposed scope of work is highly unlikely to be sufficient to adequately define the full lateral and vertical extent of contamination. Please revise your proposal for delineating the extent of MTBE in groundwater in the revised workplan requested below.

2. Well Survey

We require that you provide location addresses and copies of DWR driller's reports for all wells identified in your survey. Gribi's October 18, 2004 well survey map (Appendix C) did not include a legend identifying the types of wells denoted by the various symbols. Please provide this well survey information in the revised workplan requested below.

3. Final Soil and Water Investigation Report

Please compile summary figures and cumulative data tables presenting all historical sampling locations and analytical data. We request two tables, one for soil and one for groundwater, that present all data for the site including sample identification, sampling dates, sample depths, depth to water measurement, analytical results, etc. To simplify reporting, please report soil results in mg/kg (ppm) and groundwater results in ug/L (ppb). Please update your isoconcentration maps (depth and contaminant specific) and prepare cross-sections to include the data from the current investigation, as well as all historical site lithologic and contaminant distribution data. To substantiate interpretations made in your cross-sections, please compile and submit copies of all historical boring logs for the site. As part of your final investigation report, we request that you include recommendations for any necessary work to complete characterization of the groundwater contamination, and other appropriate corrective action to progress this case towards regulatory closure. This request is made in the interest of minimizing the number of iterations of field work performed at leaking UST sites, and to thereby reduce both the time period and costs for a case to progress to closure. Please include the summary data tables, figures, boring logs and recommendations in the investigation report requested below.

4. Interim Remedial Action

In your October 18, 2004 report, Gribi states that a workplan was submitted to conduct "Aggressive Fluid Vapor Recovery;" however, we did not receive the workplan. The December 9, 2002 *Report of Groundwater Monitoring Activities* recommends preparation of a workplan to complete the interim remediation. We concur with this recommendation. Please propose appropriate interim remediation tasks and a schedule for this work in the interim remedial action plan requested below.

5. Groundwater Monitoring

We request that you collect and analyze samples from your monitoring wells on a quarterly basis. All wells need to be sampled and analyzed for TPHg, BTEX and fuel oxygenates (MTBE, DIPE, TAME, ETBE, TBA) until sufficient baseline data is collected. No groundwater monitoring appears to have been performed during the Third Quarter 2004. Please submit your results in the quarterly reports requested below.

6. Quarterly Status Update

Pursuant to 23 CCR section 2652(d), until investigation and cleanup are complete, you are required to submit quarterly reports which include an update of the information required in section 2652(c), including current UST and property owner/operator contact information and the results of all investigation, monitoring or other corrective actions which have occurred during the reporting period. Updates are required every three months and need to include the results of the monitoring requested above (see Comment 5). Please submit your quarterly reports following the schedule specified below.

REPORT REQUEST

Please submit reports to ACEH according to the following schedule:

- January 3, 2005 - Revised SWI Workplan
- January 18, 2005 – Interim Remedial Action Plan
- 90 days following approval of revised workplan– Soil and Water Investigation Report
- January 31, 2005; April 30, 2005; July 31, 2005; October 31, 2005 - Quarterly Reports

ACEH makes this request pursuant to California Health & Safety Code Section 25296.10. CCR Title 23 Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to a reportable unauthorized release from a petroleum UST system, and require your compliance with this request.

Professional Certification and Conclusions/Recommendations

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that workplans 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.

Perjury Statement

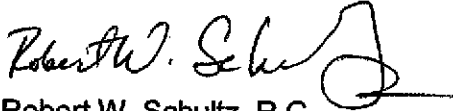
All workplans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or 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.

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 County District Attorney or other appropriate agency, for enforcement. California Health and Safety Code, Section 25299.76 authorizes ACEH enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

Please call me at (510) 567-6719 or contact me via email at robert.schultz@acgov.org with any questions regarding this case.

Sincerely,



Robert W. Schultz, R.G.
Hazardous Materials Specialist

cc: James Gribi, Gribi Associates, 1350 Hayes St., Ste. C-7, Benicia, CA 94510
Shari Knieriem, P.O. Box 944212, Sacramento, CA 94244-2120
Matt Katen, Zone 7 Water District, QIC 80201
Donna Drogos, ACEH
Robert W. Schultz, ACEH

ALAMEDA COUNTY
HEALTH CARE SERVICES

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DAVID J. KEARS, Agency Director



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RO0000333

August 11, 2003

Mr. Nolan Davis
Nolan M. & Velia E. Davis Trust
50 Oak Court, Ste. 160
Danville, CA 94526-4039

Mr. Scott Anderson
Dublin Toyota
6450 Dublin Court
Dublin, CA 94568

RE: SWI and CAP for Dublin Toyota, 6450 Dublin Court, Dublin, CA

Dear Messrs. Davis and Anderson:

This office is in receipt of the May 7, 2003 Gribi Associates groundwater monitoring report and integrated work plan for further assessment of the subject site. The Gribi work plan was submitted in response to a January 21, 2003 request from this office for a Soil and Water Investigation (SWI) work plan, as well as the completion of other associated tasks. The cited work plan was reviewed to determine if it satisfied the requested scope for the SWI work plan. Mr. Jim Gribi was contacted on August 8, 2003 to discuss the outcome of work plan review. A determination was made that a work plan addendum was necessary, as follows:

1. The SWI work plan was to have presented the results of both the requested conduit / well survey and Site Conceptual Model (SCM). The results of these tasks were not presented in the work plan, as requested, nor were these tasks used to justify the proposed scope of work and placement of sampling points. Completion of these preliminary tasks was required to appropriately scope the SWI work plan.

The conduit / well survey is intended to identify the presence of potential preferential flow pathways that may contribute to the migration of pollutants away from the source area, or to deeper water-bearing zones. This survey was to have included, among other elements, the submittal of map(s) showing the location and depth of all buried utility lines and trenches (sanitary sewers, storm sewer, water, etc.) identified in the study, and discuss how the presence of such may or may not affect plume migration.

An SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely impacts to receptors. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. At this point the SCM is considered "validated". The validated SCM forms the foundation for developing the most cost-effective final Corrective Action Plan (CAP).

Messrs. Davis and Anderson
Re: 6450 Dublin Court, Dublin
August 11, 2003
Page 2 of 2

Your attention is directed to "*Strategies for Characterizing Subsurface Releases of Gasoline Containing MtBE*", American Petroleum Institute Publication No. 4699 dated February 2000 as a resource for development of the SCM. Your attention is also directed to the State Water Resources Control Board (SWRCB) "*Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Final Draft*", dated March 27, 2000, as well as the June 2002 ChevronTexaco Energy Research and Technology Company technical bulletin entitled "*Mass Flux Estimates to Assist Decision-Making*" to help in development and strategies for refinement of the SCM, among other related tasks.

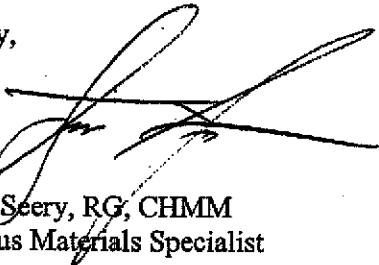
2. All reports and work plans are to be submitted under cover, signed under penalty of perjury, by the Responsible Party(ies) who have taken a lead role in compliance with corrective action directives. This work plan was not submitted in compliance with this request.

A SWI work plan addendum, containing the results of the conduit / well survey and SCM, and justification for the scope of work proposed, is to be submitted within 30 days of the date of this letter. This work plan addendum must be submitted under cover letter signed by the Responsible Parties, under penalty of perjury.

The requested work plan addendum, and all future technical reports and work plans, will be rejected absent the required cover letter.

If you have any questions, I can be reached at (510) 567-6783.

Sincerely,



Scott O. Seery, RG, CHMM
Hazardous Materials Specialist

- c: Betty Graham, RWQCB
Shari Knieriem, SWRCB UST Fund
Matt Katen, Zone 7 Water Agency
James Gribi, Gribi Associates, 1350 Hayes St., Ste. C-14, Benicia, CA 94510
D.Drogos. R.Weston

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

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RO0000333

March 18, 2003

Mr. Nolan Davis
Nolan M. & Velia E. Davis Trust
50 Oak Court, Ste. 160
Danville, CA 94526-4039

Mr. Scott Anderson
Dublin Toyota
6450 Dublin Court
Dublin, CA 94568

NOTICE OF VIOLATION

RE: SWI and CAP for Dublin Toyota, 6450 Dublin Court, Dublin, CA

Dear Messrs. Davis and Anderson:

In correspondence from this office dated January 21, 2003, you were directed to submit a Soil and Water Investigation (SWI) workplan within 45 days, or by March 7, 2003. To date, the referenced SWI work plan has not been received.

You are currently in violation of California Water Code Sec. 13267(b) and provisions of Article 11, Title 23, California Code of Regulations for failure to submit the requested SWI workplan.

Please be advised that California Health and Safety Code Sec. 25299 provides for civil penalties of up to \$5000 per day, per violation, for violations of this sort. In addition, failure to comply with directives from this office may result in your ineligibility to receive funding through the State Water Resources Control Board (SWRCB) Underground Storage Tank Trust Fund.

At this time, you are directed to submit the subject SWI workplan no later than **April 2, 2003**. Failure to do so will result in this case being referred to the Alameda County District Attorney's Office for potential enforcement action.

If you have any questions, I can be reached at (510) 567-6783.

Sincerely,


Scott O. Seery, CHMM
Hazardous Materials Specialist

c: Donna Drogos, ACDEH LOP
Roger Brewer, RWQCB
Shari Knieriem, SWRCB UST Fund
Matt Katen, Zone 7 Water Agency
James Gribi, Gribi Associates, 1350 Hayes St., Ste. C-14, Benicia, CA 94510

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO0000333

January 21, 2003

Mr. Nolan Davis
Nolan M. & Velia E. Davis Trust
50 Oak Court, Ste. 160
Danville, CA 94526-4039

Mr. Scott Anderson
Dublin Toyota
6450 Dublin Court
Dublin, CA 94568

ENVIRONMENTAL HEALTH SERVICES

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

RE: SWI and CAP for Dublin Toyota, 6450 Dublin Court, Dublin, CA

Dear Messrs. Davis and Anderson:

I have completed review of the fuel leak case file for the above referenced site, including the most recent report entitled *Report of Groundwater Monitoring Activities* prepared by Gribi Associates. I am concerned with the elevated levels of the gasoline oxygenate Methyl tert-Butyl Ether (MtBE) at the site, and the site's location within the recharge zone of the groundwater basin. This letter presents a request to complete a Soil and Water Investigation (SWI) and prepare a Corrective Action Plan (CAP) for the subject site in accordance with California Code of Regulations (CCR), Title 23, Division 3, Chapter 16, Article 11, "Corrective Action Requirements"; State Water Resources Control Board Resolution 9249, "Policies and Procedure for Investigation, Cleanup and Abatement of Discharges Under Water Code Section 13304"; and the Regional Water Quality Control Board (Regional Board) Water Quality Control Plan for the basin.

The following technical comments address investigation and cleanup performance objectives that shall be considered as part of the required SWI and CAP. We request that you prepare and submit a work plan for the SWI within 45 days of the date of this letter, or by March 7, 2003, that addresses each of the following comments.

TECHNICAL COMMENTS

1. Conduit Study

A conduit and well survey shall be prepared for the site. This survey will include, among other components, the submittal of map(s) showing the location of all wells (monitoring and production wells: active, inactive, standby, destroyed, abandoned), surface water (creeks, flood control channels), and location and depth of all utility lines and trenches (sewer and storm drain lines) identified in the study.

Using the results of the conduit study and data from previous investigations at the site, you are to develop the initial three-dimensional Site Conceptual Model (SCM) of site conditions. You are to use this initial SCM to determine the appropriate configuration for samplings points in the SWI phase of work at this site. Discuss your analysis and interpretation of the results of the conduit study and explain your rationale for the configuration of sampling points in the SWI work plan. You shall also evaluate the probability of the MtBE plume encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper drinking water aquifers, and discuss this in the work plan.

2. Contaminant Plume Definition

The purpose of contaminant plume definition is to determine the three-dimensional extent of contamination in soil and groundwater. Up to 98,000 ppb MtBE was detected in groundwater in October 1999. However, complete definition of the MtBE plume has not yet occurred. As you may know, MtBE is more mobile in soil and groundwater than other petroleum hydrocarbon compounds, is highly soluble in groundwater, and is not readily biodegradable. MtBE plumes can be long, narrow, and erratic.

Because of these characteristics, conventional investigation techniques and monitoring well networks currently used at fuel leak sites are generally insufficient to adequately characterize MtBE contamination. Therefore, it is requested that you propose an investigation that will include depth-discrete soil and groundwater sampling. Soil and groundwater samples should be collected at 5 foot intervals, areas of obvious contamination, the soil/groundwater interface, and at each lithologic change noted during boring advancement, at a minimum. It is recommended that your investigation incorporate expedited site assessment techniques and borings installed along transects to define and quantify the full three-dimensional extent of MtBE impacts. The borings are to be continuously cored and logged. Detailed cross-sections, fence diagrams, structural contours and isopachs, and rose diagrams for groundwater flow, should be subsequently incorporated into the SWI completion report.

Discuss your proposal for performing this work in the SWI work plan. The results of the conduit study, and the initial SCM, are to be presented and discussed in the SWI work plan to justify the proposed scope of work.

Expedited site assessment tools and methods are a scientifically valid and cost-effective approach to fully define the three-dimensional extent of the plume. Technical protocol for expedited site assessments are provide in the US EPA "Expedited Site Assessment Tools for Underground Storage Tank Sites: A guide for Regulators" (EPA 510-B-97-001), dated March 1997.

3. Corrective Action Plan

The purpose of the CAP is to use the information obtained during investigation activities to propose cost-effective **final cleanup objectives and remedial alternatives for both soil and groundwater impacts, including those caused by MtBE**, that will adequately protect human health and safety, the environment, eliminate nuisance conditions, and protect water resources.

A final CAP for the soil and groundwater impacts caused by an unauthorized release at the site will be requested upon completion of the SWI in accordance with the schedule specified below. The CAP shall address at least two technically and economically feasible methods to restore and protect beneficial uses of water and to meet the cleanup objectives for each contaminant established in the CAP. The CAP must propose verification monitoring to confirm completion of corrective actions and evaluate CAP implementation effectiveness.

TECHINCAL REPORT REQUEST

Please submit technical reports according to, or otherwise comply with, the following schedule:

March 7, 2003 – Work plan for Soil and Water Investigation

45 Days from Work Plan Approval – Soil and Water Investigation field work initiated

60 Days from Completion of Soil and Water Investigation – Soil and Water Investigation Completion Report

90 Days after Submittal of Soil and Water Investigation Completion Report - Corrective Action Plan

May 30, 2003 – Quarterly Sampling and Monitoring Report for 1st Quarter 2003

August 30, 2003 – Quarterly Sampling and Monitoring Report for 2nd Quarter 2003

November 30, 2003 – Quarterly Sampling and Monitoring Report for 3rd Quarter 2003

February 30, 2004 - Quarterly Sampling and Monitoring Report for 4th Quarter 2003

Messrs. Davis and Anderson
RE: 6450 Dublin Ct., Dublin
January 31, 2003
Page 3 of 3

These reports and work plans are being requested pursuant to the Regional Board's authority under Section 13267(b) of the California Water Code. Each technical report shall include conclusions and recommendations for the next phases of work required at the site. We request that all required work be performed in a prompt and timely manner, as suggested by the noted schedule, above. Revisions to this schedule shall be requested in writing with appropriate justification for anticipated delays.

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that all work plans and technical reports containing professional geologic or engineering evaluations and/or judgments be completed under the direction of an appropriately-registered or certified professional. This registered or certified professional shall sign and wet stamp all such reports and work plans.

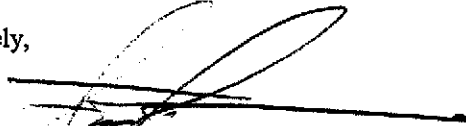
All reports and work plans are to be submitted under cover, signed under penalty of perjury, by the Responsible Party(ies) who have taken a lead role in compliance with corrective action directives.

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 Alameda County District Attorney, for possible enforcement follow up. Enforcement follow up may include administrative action or monetary penalties of up to \$10,000 per day for each day of violation of the California Health and Safety Code, Division 20, Chapter 6.76.

If you have any questions, I can be reached at (510) 567-6783.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

c: Roger Brewer, RWQCB
Shari Knieriem, SWRCB UST Fund
Matt Katen, Zone 7 Water Agency
James Gribi, Gribi Associates, 1350 Hayes St., Ste. C-14, Benicia, CA 94510

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



12-10-01

RO0000333 ✓

December 7, 2001

Mr. Scott Anderson
Dublin Toyota
6450 Dublin Court
Dublin, CA 94568

RE: QMR for 6450 Dublin Court, Dublin, CA

Dear Mr. Anderson:

This office is not in receipt of any quarterly groundwater monitoring reports since 4th quarter 2000. Be advised that Title 23 of the California Code of Regulations (23CCR), Section 2652(d), requires the owner or operator of an UST facility to submit reports every three months, or at a more frequent interval as specified by the local agency or regional water board, until investigation and cleanup are complete. In addition, the California Health and Safety Code (CHSC), Section 25298, states that underground storage tank closure is incomplete until the responsible party characterizes and remediates the contamination resulting from product discharge.

At this time, you are directed to reinstate a quarterly schedule of well sampling and monitoring. Technical summary reports documenting each well sampling and monitoring episode are also due quarterly. This schedule shall continue until further notice.

Based on Gribi Associates' September 2000 *Report of Additional Soil and Groundwater Characterization* the full extent of the MTBE plume has not been delineated. It may be necessary to install additional groundwater monitoring wells in the near future to demonstrate that the plume will not impact potential sensitive receptors. You should have a sensitive receptor survey prepared for the site at this time. The survey is due within 60 days of the date of this letter, or by **February 14, 2002**.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

email: Jim Gribi

dublinto7

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Swt 2-29-2000
INCD CC'S

20333

ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 25
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

StID 699

February 28, 2000

Mr. Scott Anderson
Dublin Toyota
6450 Dublin Court
Dublin, CA 94568

RE: Monitoring Well Installation at 6450 Dublin Court, Dublin, CA

Dear Mr. Anderson:

In October 15, 1999, I approved the proposal to install a groundwater monitoring well approximately 50 feet south, southwest of Well MW-1. To date I have not received communication from you that the well has been installed.

According to Section 25298 of the California Health and Safety Code, underground storage tank closure is incomplete until the responsible party characterizes and remediates the contamination resulting from product discharge. Therefore, Dublin Toyota, as the responsible party is in violation of this section of the Code.

After further review of the case file and a recent quarterly monitoring report (dated January 2000), it is recommended that a soil boring also be installed inside the maintenance garage for the collection of a grab groundwater sample. Please submit a revised site plan indicating the proposed soil boring in the maintenance garage within 14 days of the date of this letter or by **March 15, 2000**. The groundwater monitoring well and soil boring should be installed no later than **April 28, 2000**.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

email: Jim Gribi (jegribi@email.msn.com)

dublinto6

SENT 10-18-99

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

PO333

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

StID 699

October 15, 1999

Mr. Scott Anderson
Dublin Toyota
6450 Dublin Court
Dublin, CA 94568

RE: Workplan Approval for 6450 Dublin Court, Dublin, CA

Dear Mr. Anderson:

I have completed review of Gribi Associates' October 11, 1999 report entitled *Report of Quarterly Groundwater Monitoring Conducted on July 14, 1999, and Workplan to Conduct Additional Investigative Activities* prepared for the above referenced site. Groundwater samples were collected from the onsite wells in July 1999. Elevated MTBE levels (65,000ppb) continue to be detected in groundwater from Well MW-1.

Due to the elevated levels of MTBE, an additional groundwater monitoring well is proposed approximately 50 feet further south, southwest from well MW-1. The proposal to install the additional well is acceptable. Please notify this office at least 72 hours prior to the start of field activities.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

email: Jim Gribi (jegribi@email.msn.com)

dublintoys

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO333

ENVIRONMENTAL HEALTH SERVICES

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

StID 699

July 26, 1999

Mr. Scott Anderson
Dublin Toyota
6450 Dublin Court
Dublin, CA 94568

RE: Additional Investigations at 6450 Dublin Court, Dublin, CA

Dear Mr. Anderson:

I have completed review of Gribi Associates' July 1999 *Report of Soil and Groundwater Investigation* prepared for the above referenced site. Groundwater was sampled from the two onsite monitoring wells in April 1999. Analytical results identified elevated TPHg (45,000ppb) and MTBE (86,000ppb) levels in Well MW-1.

At this time, additional investigations are required to delineate the extent of the groundwater plume and to determine groundwater flow direction. A workplan for the next phase of investigation is due within 60 days of the date of this letter, or by **September 27, 1999**.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

C: James Gribi
1350 Hayes Street, Suite C-14
Benicia, CA 94510

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



20336

ENVIRONMENTAL HEALTH SERVICES

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

July 21, 1999
StID # 4008

Mr. Christopher Rants
P. O. Box 448
Sioux City, Iowa 51102

Re: Request for Site Closure, 580 Julie Ann Way, Oakland CA 94621

Dear Mr. Rants:

In response to the May 20, 1999 Secor International Inc. Quarterly Groundwater Monitoring Report request for site closure, our office has reviewed the site data and find that a risk assessment will be required due to elevated residual benzene concentrations. It appears, however, that using typical risk assessment assumptions, an acceptable risk may be shown. You may have your consultant contact me to discuss their risk assessment. These assumptions should be included in a Tier 2 Risk Based Corrective Action (RBCA) evaluation for this site. Should your Tier 2 RBCA conclude that the site does not pose an unacceptable risk, please also provide a risk management plan in addition to the risk assessment.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. Karey Krantz, Interstate Brands West, 580 Julie Ann Way, Oakland CA 94621
Mr. William Brasher, Secor International Inc., 90 New Montgomery St., Suite 620,
San Francisco, CA 94105-4503

RBCA580Julie

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0333

ENVIRONMENTAL HEALTH SERVICES

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

StID 699

June 3, 1999

Mr. Ed Cornelius
Dublin Toyota
6450 Dublin Court
Dublin, CA 94568

**SUBJECT: NEW LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS
FOR 6450 DUBLIN BOULEVARD, DUBLIN, CA**

This letter is to inform you of new legislative requirements pertaining to cleanup and closure of sites where an unauthorized release of hazardous substance, including petroleum, has occurred from an underground storage tank (UST). Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code requires the primary or active responsible party to notify all current record owners of fee title to the site of: 1) a site cleanup proposal, 2) a site closure proposal, 3) a local agency intention to make a determination that no further action is required, and 4) a local agency intention to issue a closure letter. Section 25297.15(b) requires the local agency to take all reasonable steps to accommodate responsible landowners' participation in the cleanup or site closure process and to consider their input and recommendations.

For purposes of implementing these sections, you have been identified as the primary or active responsible party. Please provide to this agency, within twenty calendar days of receipt of this notice, a complete mailing list of all current record owners of fee title to the site. You may use the enclosed "list of landowners" form (sample letter 2) to comply with this requirement. If the list of current record owners of fee title to the site changes, you must notify the local agency of the change within 20 calendar days from when you are notified of the change.

If you are the sole landowner, please indicate that on the landowner list form. The following notice requirements do not apply to responsible parties who are the sole landowner for the site.

In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 1) consider a cleanup proposal (corrective action plan)
- 2) consider a site closure proposal
- 3) make a determination that no further action is required
- 4) issue a closure letter

Ed Cornelius
re: 6450 Dublin Blvd, Dublin, CA
June 3, 1999
Page 2 of 2

You may use the enclosed "notice of proposed action" form (sample letter 3) to comply with this requirement. Before approving a cleanup proposal or site closure proposal, determining that no further action is required, or issuing a closure letter, the local agency will take all reasonable steps necessary to accommodate responsible landowner participation in the cleanup and site closure process and will consider all input and recommendations from any responsible landowner.

If you have any questions, I can be reached at (510) 567-6762.



eva chu
Hazardous Materials Specialist

Attachments

c: Chuck Headlee, RWQCB

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO#333

StID 699

October 16, 1998

Mr. Scott Anderson
Dublin Toyota
6450 Dublin Court
Dublin, CA 94568

ENVIRONMENTAL HEALTH SERVICES

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

RE: Work Plan Approval for 6450 Dublin Court, Dublin, CA

Dear Mr. Anderson:

I have completed review of Gribi Associates' October 1, 1998 "Workplan to Conduct Soil and Groundwater Investigation" prepared for the above referenced site. The proposal to advance six exploratory soil borings and converting two of the borings into groundwater monitoring wells is acceptable. Soil and groundwater samples will be analyzed for TPHg, BTEX, MTBE, and TPH-D/MO. The following changes/additions should be incorporated into the workplan:

1. soil and groundwater samples collected after overexcavation of the former UST pit identified low levels of naphthalene. The initial groundwater sample from the southeasterly well should also be analyzed for PNAs, and,
2. if MTBE is reported using Method 8020, run a confirmation sample using Method 8260.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

C: James Gribi
884 Vintage Ave
Suisun, CA 94585

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO# 333

StID 699

July 8, 1998

Mr. Scott Anderson
Dublin Toyota
6450 Dublin Court
Dublin, CA 94568

Mr. Nolan Davis
50 Oak Court, Suite 160
Danville, CA 94526

RE: PSA for 6450 Dublin Blvd, Dublin, CA

Dear Messrs. Anderson and Davis:

I have completed review of Scott Co's June 1998 "Closure Report" for the above referenced site. This report included the analytical results of soil and groundwater samples collected when three underground storage tanks (UST) were removed in June 1998. Up to 2,000 parts per million total petroleum hydrocarbons as gasoline (ppm TPHg), 720 ppm TPH as diesel, 5.5 ppm benzene, and 30 ppm MTBE were detected in the soil samples. And groundwater samples contained up to 61,000 parts per billion (ppb) TPHg, 2,700 ppb benzene, and 120,000 ppb MTBE. Clearly, an unauthorized release of petroleum hydrocarbons has occurred at the site.

At this time, additional investigations are required to determine the extent and severity of soil and groundwater contamination at the site. Such an investigation shall be in the form of a **Preliminary Site Assessment**, or PSA. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, and Article 11 of Title 23, California Code of Regulations. The major elements of such an investigation are summarized in the attached Appendix A.

The PSA proposal is due **within 60 days** of the date of this letter. Once the proposal is approved, field work should commence within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this site qualifies for RWQCB "sign off." All reports and proposals must be submitted under seal of a California Registered Geologist, Certified Engineering Geologist, or Registered Civil Engineer.

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

Messrs. Anderson and Davis
re: PSA for 6450 Dublin Blvd, Dublin
July 8, 1998
Page 2 of 2

Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this agency.

If you have any questions about the contents of this letter, I can be reached at (510) 567-6762.



eva chu
Hazardous Materials Specialist

enclosure

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0333

August 14, 1990

Jim Welle
Crossroads Pontiac Toyota
6450 Dublin Ct.
Dublin, CA 94568

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

Re: Waste Minimization Assessment

Dear: Jim Welle:

Your business has been selected to receive a "pilot" hazardous waste minimization assessment. As you are probably aware, hazardous waste reduction has become a statewide, if not a national, issue. To address this issue at a county level, Alameda County is establishing its own Hazardous Waste Minimization Program and is planning to conduct waste minimization assessments for all hazardous waste generating facilities in the County. To begin the program, we have selected twenty auto repair businesses to receive assessments. It is our hope that these "pilot" assessments will assist the businesses in minimizing their hazardous wastes and will give us further information on the most effective way to structure our minimization program.

One of our Hazardous Materials Specialists will be contacting you to arrange to meet with you and assess your business during the week of August 21. During this meeting and assessment, the Specialist will work with you in examining your business's hazardous waste generating practices. The Specialist will then provide you with materials on existing waste reduction technology, and assist you in setting up appropriate hazardous waste minimization practices.

We thank you in advance for your participation in this pilot study. Your comments and suggestions are welcomed and encouraged; we need your input so we can best assist you! Please direct your comments and any questions to Katherine Chesick at 415/271-4320.

Sincerely,

A handwritten signature in cursive script that reads "Edgar B. Howell". A horizontal line is drawn across the signature.

Edgar B. Howell, Chief,
Alameda County Hazardous Materials Division

EBH:kac

cc: Fire Department
Files