



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

December 17, 2009

Andrew Cullen (*Sent via E-mail to: andrew.cullen@penske.com*)
Penske Truck Leasing Company
Route 10 Green Hills Road
P.O. Box 7635
Reading, PA 19603-7635

Subject: Fuel Leak Case No. RO0000354 and GeoTracker Global ID T0600101062, Hertz Penske, 725 Julie Ann Way, Oakland, CA 94621

Dear Mr. Cullen:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted documents entitled, "Soil and Groundwater Investigation and Groundwater Monitoring Report," dated September 1, 2009 and the "Monitoring Well Installation Work Plan," dated October 27, 2009, which were both prepared by Stantec Consulting Corporation for the subject site. The report summarizes the subsurface investigation conducted to assess the effectiveness of the Fenton's reagent injection remedial action as well as evaluate the existing groundwater monitoring well construction to ensure that that groundwater samples collected from the wells are representative of actual contaminant concentrations.

Stantec concluded that although successful, the Fenton's reagent was "likely limited by the predominance of fine-grained soils beneath the Site," and recommended replacing monitoring wells MW-1 and MW-7 due to their inability to monitor free product.

ACEH does not agree that the Fenton's reagent was as successful as Stantec stated since elevated concentrations of TPH-g, TPH-d, benzene, and naphthalene are present in soil and groundwater samples collected from several borings installed down-gradient of the USTs at the site. However, ACEH does generally concur with the proposed decommissioning and re-installing of monitoring wells MW-1 and MW-7 and that the proposed scope of work may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. 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.

TECHNICAL COMMENTS

1. **Monitoring Well Construction** – In the work plan, Stantec proposes that "[f]ollowing advancement of the borehole at least 10 feet into first-encountered groundwater, the tool string will be removed and static groundwater will be allowed to equilibrate in the borehole for approximately one hour. This will allow for an accurate determination of the static depth-to-groundwater prior to installing the well casing, in order to confirm that the well screen intercepts the groundwater surface." In the above-mentioned report, Stantec states that static

depth to groundwater in borings installed at the site is approximately 9 to 10.5 feet bgs. However, static depths to groundwater in site groundwater monitoring wells are shallower at approximately 5 feet bgs. According to the several boring logs included in the above-mentioned report, soils were logged as "wet" at approximately 5 feet bgs (SB-1, SB-3, SB-4, SB-6, and SB-7), but static groundwater was reported deeper at approximately 9 to 10.5 feet bgs. Perhaps the borings were not left open long enough for groundwater to equilibrate since it appears that the borings were grouted the day they were installed. In fine-grained soils, it is not uncommon to leave the borings open overnight for groundwater to stabilize. Therefore, please allow sufficient time for groundwater to stabilize prior to installing the monitoring wells. Should groundwater elevation for the newly installed wells rise above the screened interval, re-installation of monitoring points may be required.

2. **Feasibility Study/Corrective Action Plan** – As mentioned above, elevated concentrations of petroleum hydrocarbons still remain in soil and groundwater. Confirmation soil sample analytical results detected TPH-g, TPH-d, benzene, and naphthalene at elevated concentrations of 320 mg/kg, 12,000 mg/kg, 4.8 mg/kg, and 0.610 mg/kg, respectively. Confirmation "grab" groundwater samples detected TPH-g, TPH-d, benzene, and naphthalene at elevated concentrations of 300,000 µg/L, 4,000,000 µg/L, 12,000 µg/L, and 950 µg/L, respectively. Analytical results appear to indicate that the site poses a potential risk to human health and the environment. To that end, once monitoring wells MW-1 and MW-7 are decommissioned and re-installed, a Feasibility Study/Corrective Action Plan (FS/CAP) prepared in accordance with Title 23, California Code of Regulations, Section 2725 appears appropriate. The FS/CAP must include a concise background of soil and groundwater investigations performed in connection with this case and an assessment of the residual impacts of the chemicals of concern (COCs) for the site and the surrounding area where the unauthorized release has migrated or may migrate. The FS/CAP should also include, but not limited to, a detailed description of site lithology, including soil permeability, and most importantly, contamination cleanup levels and cleanup goals, in accordance with the San Francisco Regional Water Quality Control Board (SFRWQCB) Basin Plan for all COCs and for the appropriate groundwater designation. Please note that soil cleanup levels should ultimately (within a reasonable timeframe) achieve water quality objectives (cleanup goals) for groundwater in accordance with the SFRWQCB Basin Plan. Please specify appropriate cleanup levels and cleanup goals in accordance with 23 CCR Section 2725, 2726, and 2727 in the FS/CAP.

At least three viable alternatives for remedying or mitigating the actual or potential adverse effects of the unauthorized release(s) besides the "no action" and "monitored natural attenuation" remedial alternatives must be evaluated in the FS/CAP. Each alternative shall be evaluated not only for cost-effectiveness but also its timeframe to reach cleanup levels and cleanup goals, and ultimately the Responsible Party must propose the most cost-effective corrective action.

NOTIFICATION OF FIELDWORK ACTIVITIES

Please schedule and complete the fieldwork activities by the date specified below and provide ACEH with at least three (3) business days notification prior to conducting the fieldwork.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Paresh Khatri), according to the following schedule:

- **March 17, 2010** – Soil and Water Investigation Report
- **Due within 30 Days of Sampling** – Semi-annual Monitoring Report (1st Quarter 2010)
- **April 16, 2010** – Feasibility Study/Corrective Action Plan
- **Due within 30 Days of Sampling** – Quarterly Monitoring Report (3rd Quarter 2010)
- **Due within 30 Days of Sampling** – Quarterly Monitoring Report (4th Quarter 2010)

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.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml).

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.

Mr. Cullen
RO0000354
December 17, 2009, Page 4

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) 777-2478 or send me an electronic mail message at paresh.khatri@acgov.org.

Sincerely,

Paresh C. Khatri
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Eva Hey, Stantec Consulting Corporation, 57 Lafayette Circle, 2nd Floor, Lafayette, CA 94549
(Sent via E-mail to: Eva.Hey@stantec.com)

Angus E. McGrath, Stantec Consulting Corporation, 57 Lafayette Circle, 2nd Floor, Lafayette, CA 94549 (Sent via E-mail to: Angus.McGrath@stantec.com)

Neil Doran, Stantec Consulting Corporation, 57 Lafayette Circle, 2nd Floor, Lafayette, CA 94549 (Sent via E-mail to: Neil.Doran@stantec.com)

Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (Sent via E-mail to: lgriffin@oaklandnet.com)

Donna Drogos, ACEH (Sent via E-mail to: donna.drogos@acgov.org)

Paresh Khatri, ACEH (Sent via E-mail to: paresh.khatri@acgov.org)

GeoTracker

File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: March 27, 2009
	PREVIOUS REVISIONS: December 16, 2005, October 31, 2005
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

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- 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)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

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 dehloptoxic@acgov.org
Or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of My Le Huynh.
 - 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 and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - 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 dehloptoxic@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.