



ENVIRONMENTAL HEALTH DEPARTMENT
ENVIRONMENTAL PROTECTION
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August 12, 2010

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:

Thank you for the recently submitted document entitled, "Monitoring Well Installation and 2010 Semi-annual Groundwater Monitoring Report," dated March 25, 2010, which was prepared by Stantec Consulting Corporation for the subject site. Alameda County Environmental Health (ACEH) staff has reviewed the case file including the above-mentioned report for the above-referenced site. Stantec decommissioned submerged screened groundwater monitoring wells MW-1 and MW-7 and re-installed monitoring wells MW-1R & MW-7R, with screened intervals from 3.5 ft to 20 ft bgs. Stantec states that "[w]ells MW-1R and MW-7R are appropriately screened to observe free product on the groundwater table based on measured static groundwater and the well screen interval," and recommends three additional sampling events to evaluate conditions in the new wells prior to preparing a FS/CAP.

ACEH has concerns that the newly installed groundwater monitoring wells may not be yielding analytical results representative of site conditions based on a review of the boring logs and analytical data and requests that you address the following technical comments and send us the technical reports described below.

TECHNICAL COMMENTS

1. **Monitoring Well Installations** – In the "Monitoring Well Installation Work Plan," dated October 27, 2009, Stantec proposed 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 "Soil and Groundwater Investigation and Groundwater Monitoring Report," dated September 1, 2009,

Stantec states that static depth to groundwater in borings installed at the site is approximately 9 to 10.5 feet bgs.

In our December 17, 2009 correspondence, ACEH had expressed concerns with Stantec's proposal and stated "static depths to groundwater in site groundwater monitoring wells are shallower at approximately 5 feet bgs."

In the above mentioned report, Stantec states that "[e]ach borehole was advanced to approximately 20.5 ft-bgs, the tool string was removed, and a temporary well casing was installed in the borehole. Groundwater levels in the boreholes were allowed to equilibrate overnight to provide for an accurate measurement of the static groundwater elevation. The static depth-to-groundwater was measured at 4.5 ft-bgs in the boring for MW-1R and at 5 ft-bgs in the boring for MW-7R. These measurements were used to determine the screened interval of the permanent well casing."

Based on Stantec's original proposal and ACEH's concerns identified in our December 17, 2009, the monitoring wells should have been installed with a screened interval from 3.5 ft to 13.5 ft bgs. However, according to Stantec, "[o]nce the static depth-to-groundwater was measured, the temporary well casing was removed and the borehole was then over-drilled using 8-inch-diameter hollow-stem auger. The wells were constructed of 2-inch-diameter Schedule 40 polyvinyl chloride (PVC) casing with a 0.020-inch slotted screen interval from 3.5 ft-bgs to 20 ft-bgs. This construction, approximately 1.5 feet of unsaturated screen above the static groundwater level, allows for seasonal fluctuations in the groundwater elevation." Therefore, the replacement monitoring wells appear to have been installed with excessively long screened intervals.

According to Stantec, "[t]he TPHd concentration reported in replacement well MW-1R is consistent with historical data from MW-1. The TPHd concentration reported in replacement well MW-7R is lower than historical data from well MW-7." Please note that the monitoring wells MW-1 and MW-7 were decommissioned and re-installed due to submerged well screens and the elevated concentrations of TPH-d (72,000 µg/L detected in SB-2, 190,000 µg/L detected in SB-3, and 4,000,000 µg/L in SB-5) detected in "grab" groundwater samples installed in the immediate vicinity of monitoring wells MW-1 and MW-7 in April 2009. During the April 2009 subsurface investigation, groundwater was encountered between 5 to 9 feet bgs in several of the borings, which were installed to a total depth of approximately 12 feet bgs, with the exception of SB-7 and SB-8, which were installed to a total depth of 20 feet bgs. A review of the boring logs for MW-1R and MW-7R identifies a clayey sand at a depth of approximately 16 feet bgs underlain by a silty sand from approximately 17 feet to approximately 20 feet bgs.

Since groundwater was encountered in several borings at shallow depth (5 to 9 ft bgs), ACEH is concerned that the excessively long screened intervals of newly installed groundwater monitoring wells MW-1R and MW-7R may be intersecting two water-bearing zones (second water-bearing zone may be semi-confined to confined), resulting in dilution of concentrations of TPH-d detected in those wells as well as providing a potential conduit for contaminant migration to a deeper water-bearing zone. ACEH does acknowledge that groundwater data from monitoring wells may be more representative of actual groundwater conditions than "grab" groundwater data. However, the monitoring wells used to obtain the data must be properly constructed based on site lithology. Please provide a discussion that addresses the

above-mentioned concerns as well as validates the data collected from the newly installed wells. Also discuss why the screened interval of the wells were installed to a depth of 20 feet bgs when it was specified in the work plan that wells screens would only intersect 10 feet into first encountered groundwater and whether or not the monitoring wells are intersecting two water-bearing zones. If adequate justification cannot be provided and additional data is required, please submit a work plan to address the concerns.

2. **Groundwater Sampling Analytical Suite** – One of the human health and environmental risk drivers for unauthorized releases of diesel fuel is the polycyclic aromatic hydrocarbon (PAH), naphthalene. A 10,000-gallon underground storage tank at the site was utilized to store diesel fuel. During the April 2009 subsurface investigation, naphthalene was detected in soil and groundwater samples. Therefore, please include naphthalene analysis to the current groundwater sample analytical suite.

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, including routine groundwater sampling.

TECHNICAL REPORT REQUEST

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

- **October 1, 2010** – Soil and Water Investigation Report Addendum or Work 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)
- **Due within 30 Days of Sampling** – Quarterly Monitoring Report (1st Quarter 2011)
- **Due within 30 Days of Sampling** – Quarterly Monitoring Report (2nd Quarter 2011)

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, 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

Mr. Cullen
RO0000354
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Enclosure: Responsible Party(ies) Legal Requirements/Obligations
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

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.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.

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 dehloptoxic@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.
 - 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 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.