

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-93

February 13, 2009

Ms. Rita Sullins  
Don Sul, Inc.  
187 North L Street  
Livermore, CA 94550

Ms. Jennifer Sedlacek  
Exxon Mobil  
4096 Piedmont, #194  
Oakland, CA 94611

Subject: Fuel Leak Case No. RO0000394 and Geotracker Global ID T0600100116, Arrow Rentals, 187 North L Street, Livermore, CA 94550 – Reduced Groundwater Monitoring

Dear Ms. Sullins and Ms. Sedlacek:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site including the recently submitted correspondence dated February 4, 2009. The correspondence, which was prepared by Geological Technics, Inc. on behalf of Tony and Rita Sullins, requests a reduction in groundwater monitoring frequency. The site is currently monitored on a semi-annual basis. The February 4, 2009 correspondence requests that semi-annual groundwater monitoring be suspended in anticipation of remediation system installation and that a reduced schedule of annual monitoring be resumed after the remediation system is installed. A reduction or suspension of monitoring is also requested for wells W-Es and MW-306.

We have no objection to suspending groundwater monitoring until the remediation system becomes operational. We also have no objection to reducing or suspending groundwater monitoring for wells W-Es and MW-306. However, we do not concur with the proposal to conduct annual monitoring after the remediation system becomes operational. A greater frequency than annual monitoring is required to evaluate remedial system performance. The "*Corrective Action Plan (Final)*," dated August 1, 2007 proposes semi-annual groundwater monitoring with monthly sampling of wells W-1, W-1s, W-Bs, MW-4, 104, & 204, and MW-8, 108 & 208 for monitoring contaminant trends following remediation start-up. ACEH concurred with and approved the Final CAP in correspondence dated August 17, 2007. In order to modify the groundwater monitoring and reporting proposed in the Final CAP, you may submit a modified proposal for groundwater monitoring but the modified proposal must provide sufficient data following remediation start-up to monitor remedial system performance and to make decisions regarding system operation.

**TECHNICAL REPORT REQUEST**

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

- **May 1, 2009** – Remediation System Start-Up Report

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

#### ELECTRONIC SUBMITTAL OF REPORTS

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/cleanup/electronic\\_reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

#### PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this 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.

Rita Sullins  
Jennifer Sedlacek  
RO0000394  
February 13, 2009  
Page 3

### **UNDERGROUND STORAGE TANK CLEANUP FUND**

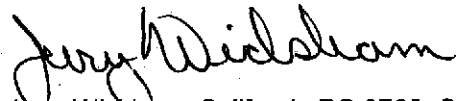
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

### **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) 567-6791 or send me an electronic mail message at [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org).

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297  
Senior Hazardous Materials Specialist

Attachment: Correspondence from Geological Technics, Inc. dated February 4, 2009  
Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

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

Chris Davidson, City of Livermore, Economic Development, 1052 S. Livermore Ave., Livermore, CA  
94550

Tamora Bryant, Geological Technics, Inc., 1101 7<sup>th</sup> Street, Modesto, CA 95354

Heidi Timken, Timken, Johnson, Hwang, 500 Ygnacio Valley Road, Suite 360, Walnut Creek, CA  
94596

Christa Marting, ETIC Engineering, Inc., 2285 Morello Avenue, Pleasant Hill, CA 94523

Donna Drogos, ACEH  
Jerry Wickham, ACEH

1101 7<sup>th</sup> Street  
Modesto, CA 95354  
209.522.4119  
209.522.4227 (fax)  
gti@geologicaltechnics.com

2009 FEB -6 PM 3:08

February 4, 2009

Project No.: 1262.2  
Project Name: Sullins (L St.)

Jerry Wickham  
Hazardous Materials Specialist  
Alameda County Environmental Health Services  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577

RE: Arrow Rentals Service  
187 North L Street  
Livermore, CA 94550

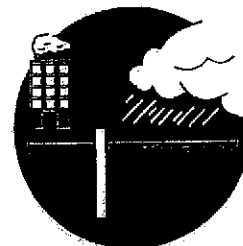
Dear Mr. Wickham:

The purpose of this correspondence is to respectfully request ACEHS approval to reduce the groundwater monitoring frequency for the Arrow Rentals Service site in Livermore. GTI is in the process of implementing a Corrective Action Plan (CAP) for the site, which includes coordinating with PG&E for temporary service to the site in anticipation of installing and operating a dual phase remediation system.

Under the current schedule, the next groundwater monitoring event of the existing 22 on-site groundwater monitoring wells would occur in the second quarter of 2009.

Upon reviewing the groundwater monitoring data, it appears that monitoring well W-Es and MW-306 have been reporting trace or levels of contamination below laboratory analytical data detection limits. In fact, monitoring well W-Es has been non-detect since the second quarter of 2006. In the interests of providing site characterization and remediation in the most cost effective manner, we would like to request that the monitoring of these two wells be reduced or suspended.

At this time, we respectfully request that the semi-annual groundwater monitoring be temporarily suspended in anticipation of the remediation system installation, and that a reduced schedule of annual monitoring (of the 20 on-site groundwater monitoring wells) be resumed after the remediation system is installed and start up operations have commenced.



# Geological Technics Inc.

1101 7<sup>th</sup> Street  
Modesto, CA 95354  
209.522.4119  
209.522.4227 (fax)  
gti@geologicaltechnics.com

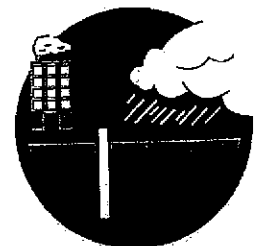
Please contact me at (209) 522-4119 should you have any questions or need more information.

Thank you,



Tamorah Bryant, P.E.

cc. Tony & Rita Sullins  
USTCUF  
Chris Davidson – City of Livermore  
Jennifer Sedlecek – Exxon Mobile Corp.



<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>ISSUE DATE:</b> July 5, 2005
	<b>REVISION DATE:</b> December 16, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures.	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

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.

#### 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](mailto:dehloptoxic@acgov.org)  
or
  - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
- 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](mailto: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 at acgov.org. (e.g., [firstname.lastname@acgov.org](mailto: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)