



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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July 17, 2008

Karen Burlingame
Goodyear Tire & Rubber Company
1144 East Market Street
Akron, OH 44316-0001

Melissa W. Phillips
Aimee L. West Trust
1352 A Street
Hayward, CA 94541-2927

Subject: Fuel Leak Case No. RO0000474 and Geotracker Global ID T0600101801, Merritt Tire Sale, 3430 Castro Valley Boulevard, Castro Valley, CA 94546

Dear Ms. Burlingame and Ms. Phillips:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Semi-annual 2007 Groundwater Monitoring Event (December 2007)," dated February 22, 2008, which was prepared by Secor International Incorporated (Secor) for the subject site. It appears that the waste oil UST was removed prior to 1993. Two borings were installed within the former footprint of the UST in September 1993, which detected elevated concentrations of hydrocarbons in the soil. In September 1994, three groundwater monitoring wells (MW-1 through MW-3) were installed to assess groundwater conditions. Free product was detected in groundwater monitoring well MW-3. In December 1996, four additional borings (PB-1 through PB-4) were installed at the site with boring PB-4 converted to groundwater monitoring well MW-4. To date, free product has been persistently detected in groundwater monitoring well MW-3, located down-gradient of the waste oil UST.

ACEH requests that you address the following technical comments and send us the work plan and technical reports requested below.

TECHNICAL COMMENTS

1. **Contaminant Source Area Characterization** – In September 1993, SEMCO installed two borings and collected soil samples at 8 feet below the ground surface (bgs) to determine whether the former waste oil UST had impacted the soil at the site. Total petroleum hydrocarbons (TPH) as diesel (d) and total oil and grease (TOG) were detected at concentrations of 2,400 milligrams per kilogram (mg/kg) and 6,100 mg/kg, respectively, in soil sample No. 1 – South indicating the soil has been impacted. EMCON installed four additional borings at the site with boring PB-1 located just south of the former UST excavation. Concentrations of TPH as gasoline (g) and benzene were detected at 120 mg/kg and 0.6 mg/kg, respectively, in a soil sample collected at 3 to 3.5 feet bgs. Based on the analytical results, the vertical and lateral extent of the contaminant source area appears undefined.

In November 1993, Touchstone Developments installed three groundwater monitoring wells (MW-1 through MW-3) with MW-3 located approximately 10 feet south of the former UST excavation. Free product has been persistently detected in this monitoring well since 1994. Based on the analytical results, the extent of free product in groundwater also appears undefined. Please propose a scope of work to address the above-mentioned concerns and submit a work plan by date specified below.

2. **Monitoring Wells and Hydrogeologic Setting** – In September 1994, Touchstone Developments installed three groundwater monitoring wells (MW-1 through MW-3) with MW-3 located approximately 10 feet south of the former UST excavation where free product has been persistently detected since the monitoring well was installed. Monitoring well MW-1 was installed to a total depth of 22 feet bgs with a screened interval from 10 to 20 feet bgs, MW-2 was installed to a total depth of 21 feet bgs with a screened interval from 8.5 to 20 feet bgs, and MW-3 was installed to a total depth of 21 feet bgs with a screened interval from 10 to 20 feet bgs. In December 1996, monitoring well MW-4 was installed to a depth of 16 feet bgs with a screened interval from 5.03 to 14.55 ft bgs, located approximately 85 feet down-gradient of the former UST. Depth to groundwater measured in site groundwater monitoring wells range from 3.77 to 8.68 feet bgs. Since groundwater elevation is above the screened interval for site monitoring wells MW-1 through MW-3 and petroleum hydrocarbons have a specific gravity that is lower than water (therefore, float on water); concentrations of contaminants detected may not be representative of actual site conditions, including the amount of free product measured in monitoring well MW-3. Therefore, the monitoring wells appear to be incorrectly constructed, which may affect the contaminant concentrations detected in groundwater. Please evaluate and discuss the effect that groundwater elevations rising above monitoring well screens have on hydrocarbon concentrations for each monitoring well at the site. Please address the above-mentioned concerns and include your analysis in the work plan requested below.
3. **Preferential Pathway Study**- Depth to groundwater at the site has ranged between 3.77 to 8.68 feet bgs. Since groundwater is relatively shallow at the site, a preferential pathway evaluation appears prudent. The purpose of the preferential pathway study is to locate potential migration pathways and conduits and determine the probability of the NAPL and/or plume encountering preferential pathways and conduits that could spread contamination. We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for vertical and lateral migration that may be present in the vicinity of the site.

Discuss your analysis and interpretation of the results of the preferential pathway study (including the detailed well survey and utility survey requested below) and report your results in the work plan requested below. The results of your study shall contain all information required by California Code of Regulations, Title 23, Division 3, Chapter 16, §2654(b).

a. Utility Survey

An evaluation of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s) is required as part of your study. Please include maps and cross-sections illustrating the location and depth of all utility lines and trenches within and near the site and plume areas(s) as part of your study.

b. Well Survey

The preferential pathway study shall include a detailed well survey of all wells (monitoring and production wells: active, inactive, standby, decommissioned (sealed with concrete), abandoned (improperly decommissioned or lost); and dewatering, drainage, and cathodic protection wells) within a ¼ mile radius of the subject site. As part of your detailed well survey, please perform a background study of the historical land uses of the site and properties in the vicinity of the site. Use the results of your background study to determine the existence of unrecorded/unknown (abandoned) wells, which can act as contaminant migration pathways at or from your site. Please review and submit copies of historical maps, such as Sanborn maps, aerial photographs, etc., when conducting the background study.

4. **Groundwater Contaminant Plume Monitoring** – Currently semi-annual groundwater monitoring is being conducted at the site with analysis for TPH-d, TPH-g, TPRH, BTEX, MtBE, and lead. However, groundwater samples collected in October 1994 detected semi-volatile organics (i.e. Vinyl Chloride, 1,1-Dichloroethene, 1,1-Dichloroethane, c-1,2-Dichloroethene, 1,1,1-Trichloroethene, 1,2-Dichloroethane, Trichloroethene, Tetrachloroethene). Please add semi-volatile organics and lead scavengers (i.e. ethylene dichloride (EDC) and ethylene dibromide (EDB)) to the analytical suite and submit groundwater monitoring reports by the date specified below.
5. **Feasibility Study/Corrective Action Plan** – Once the contaminant source areas are adequately characterized, 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 Basin Plan and appropriate ESL guidance 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 San Francisco Regional Water Quality Control Board Basin Plan. Please propose appropriate cleanup levels and cleanup goals in accordance with 23 CCR Section 2725, 2726, and 2727 in the FS/CAP.

The FS/CAP must evaluate at least three viable alternatives for remedying or mitigating the actual or potential adverse effects of the unauthorized release(s) in addition to the 'no action' and 'monitored natural attenuation' remedial alternatives. Each alternative shall be evaluated for cost-effectiveness and the Responsible Party must propose the most cost-effective corrective action.

TECHNICAL REPORT REQUEST

Please submit work plans and technical reports to Alameda County Environmental Health (Attention: Paresh Khatri), according to the following schedule:

- **October 13, 2008** – Soil and Water Investigation Work Plan & Preferential Pathway Evaluation
- **January 30, 2009** - Quarterly Monitoring Report (4th Quarter 2008)
- **July 30, 2009** - Quarterly Monitoring Report (2nd Quarter 2009)

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

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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



Donna L. Drogos, PE
Supervising Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Chris Strong, Secor International Incorporated, 2301 Leghorn Street, Mountain View, CA 94043
Donna Drogos, ACEH (sent via electronic mail)
Paresh Khatri, ACEH (sent via electronic mail)
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: 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
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 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)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload)