

ALAMEDA COUNTY
HEALTH CARE SERVICES



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AGENCY
DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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February 20, 2007

Mr. Jerry Pluth
In Town Communities LLC
3130 Crow Canyon Road
San Ramon, CA 94583-4631

Ms. Carol Wallace
Christopher and Carol P. Wallace Trust
509 Ironwood Road
Alameda, CA 94502

Subject: Fuel Leak Case No. RO0002737, Impulse Motors, 1210 Bockman Road, San Lorenzo, CA

Dear Mr. Pluth and Ms. Wallace:

Alameda County Environmental Health (ACEH) staff has reviewed the case file and the documents entitled, "Underground Storage Tank Closure Report," prepared by ACC Environmental Consultants, dated June 15, 2004, and "Soil Excavation Report," Prepared by Secor International dated February 1, 2007. The soil excavation report presents the results from excavation activities associated with the former underground storage tank and the former dispenser islands.

Based on the concentrations of TPH and TPH constituents detected in the soil, and the limited amount of soil and groundwater data downgradient of the source area, an investigation is required to evaluate the extent of soil contamination and determine if groundwater contamination is present immediately downgradient of your site. Please submit a work plan detailing your proposal to define the extent of soil and groundwater contamination downgradient of your site.

Based on ACEH staff review of the documents referenced above, we request that you address the following technical comments, perform the proposed work, and send us the reports described below. This report is being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code. Please provide 72-hour advance written notification to this office (e-mail preferred to <mailto:steven.plunkett@acgov.org>) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Site Characterization.** Soil sampling conducted during the initial underground storage tank (UST) and fuel dispenser removal detected high concentrations of TPHg and BTEX constituents at up to 5,900 mg/kg of TPHg and 8.5 mg/kg benzene. Subsequently, remedial activities in the source area including excavation and disposal of approximately 300 cubic yards of impacted soil to mitigate petroleum hydrocarbon contamination. However, the horizontal and vertical extent of soil and groundwater contamination downgradient of the source area has not been fully defined. Therefore, you are required to complete a soil and

groundwater investigation to characterize the extent of petroleum hydrocarbon contamination immediately downgradient of the former UST and dispenser complex.

We recommend that your investigation incorporate expedited site assessment techniques. Expedited site assessment tools and methods are a scientifically valid and cost-effective approach to fully define the three-dimensional extent of groundwater contamination. Technical protocol for expedited site assessments are provided in the U.S. Environmental Protection Agency's "Expedited Site Assessment tools for Underground Storage Tanks: A Guide for Regulators," (EPA 510-B-97-001), dated March 1997. Therefore, we recommend that you utilize direct push technology to collect soil samples and depth-discrete groundwater samples. Sampling locations should be sited to assess the extent of soil and groundwater contamination downgradient of the source area. Other options for additional investigation may be appropriate to define contamination at your site. Please present plans to fully define the lateral and vertical extent of soil and groundwater contamination at the site in the Work Plan requested below.

2. **Soil Gas Investigation and Soil Vapor Sampling.** The proposed redevelopment activities include construction of residential housing units in the location of the former USTs and fuel dispensers. In order to evaluate the vapor intrusion pathway associated with petroleum hydrocarbon contamination in shallow soil, ACEH request that you conduct soil vapor sampling in conjunction with the soil and groundwater investigation. The potential for indoor air vapor intrusion cannot be evaluated directly using analytical data from soil or groundwater samples. Therefore, soil vapor sampling is to be conducted adjacent to and immediately downgradient of the former UST and fuel dispenser islands. Soil vapor sampling and quality control protocol are to be in conformance with guidelines contained in the January 28, 2003 *Advisory for Active Soil Gas Investigations* prepared jointly by the California Department of Toxic Substances Control and Los Angeles Regional Water Quality Control Board. Please describe the scope of work and methods for soil vapor sampling and analyses in the Work Plan requested below.
3. **Monitoring Well Abandonment.** During a site visit to observe soil excavation and confirmation sampling, ACEH staff identified two pvc pipes projecting above grade. It was determined that the pvc casings were likely "monitoring wells" installed during previous activities. ACEH has been unable to document the existence of any monitoring wells associated with the site. Consequently, ACEH request the "monitoring wells" be abandoned in accordance with Alameda County Department of Public Works guidelines for well abandonment.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Steven Plunkett), according to the following schedule:

- March 30, 2007 – Work Plan for Soil and Groundwater Investigation

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.

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

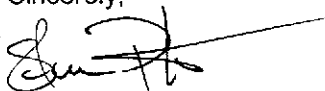
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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) 383-1767.

Sincerely,



Steven Plunkett
Hazardous Materials Specialist

Mr. Jerry Pluth
February 17, 2005
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cc: Kyle Emerson
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25684-F Business Center Drive
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Donna Drogos, ACEH
Steven Plunkett, ACEH
File