

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
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September 10, 2007

Mr. Nick Garcia  
Olson Company/In Town Communities LLC  
3130 Crow Canyon Place, Suite 210  
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 (Global ID #T06019771179), Impulse Motors, 1210 Bockman Road, San Lorenzo, CA

Dear Mr. Garcia and Ms. Wallace:

Alameda County Environmental Health (ACEH) staff has reviewed the case file and the documents entitled, "Soil, Soil Vapor and Groundwater Investigation" and Soil Excavation Report" dated May 29, 2007 and February 7, 2007 prepared by Secor International. Additional overexcavation of the former UST and dispenser island was completed in February 2007 and approximately 200 cubic yards of contaminated soil was removed and disposed of offsite. Soil sampling conducted after the overexcavation identified TPHg at concentrations of up to 120 mg/kg at one location, while benzene and MtBE were not detected above laboratory detection limits.

The investigation report presents the results from soil vapor, soil and groundwater sampling conducted to evaluate the unauthorized release associated with the former underground storage tanks and dispenser islands. Results from the investigation indicate that dissolved phase petroleum hydrocarbon contamination was detected in groundwater at concentrations of up to 21,000 µg/L TPHg and 110,000 µg/L TPHd beneath your site. Low concentrations of up to 52 µg/L TPHg were detected in soil vapor, while benzene and MtBE were not detected in soil vapor above laboratory detection limits. Therefore, ACEH requests you're your prepare a work plan to install groundwater monitoring wells to monitor and evaluate the extent of dissolved phase petroleum hydrocarbon contamination beneath and immediately downgradient of the former gasoline service station.

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 prior to the start of field activities (e-mail preferred to <mailto:steven.plunkett@acgov.org>).

**TECHNICAL COMMENTS**

1. **Monitoring Well Installation and Well Construction.** Currently, no groundwater monitoring wells have been installed at your site. To monitor groundwater conditions beneath the former gasoline service station, groundwater monitoring wells are required. Considerable research has been conducted to demonstrate that conventional long screen monitoring wells produce biased groundwater quality data. In particular, well-bore mixing and vertical flow within the well bore can result in variable concentration and vertical distribution of contamination across the well screen that are not representative of the actual vertical distribution of dissolved contamination in the aquifer. Therefore, ACEH request the installation of monitoring wells designed with sand pack intervals of 5' or less. Please present your rationale for the proposed monitoring well locations and well construction in the Work Plan requested below.
2. **Quarterly Groundwater Monitoring.** Following the installation of groundwater monitoring wells, ACEH request that quarterly groundwater monitoring and sampling be initiated for your site. We requests that you collect groundwater samples on a quarterly basis from each of the monitoring wells. The groundwater samples are to be analyzed for total petroleum hydrocarbons as gasoline (TPH-G), total petroleum hydrocarbons as diesel (TPH-D), benzene, toluene, ethylbenzene, total xylenes (BTEX compounds), five fuel oxygenates, methyl-t-butyl ether (MTBE), diisopropyl ether (DIPE), ethyl-t-butyl ether (ETBE), tert-amyl methyl ether (TAME), and tert-butanol (TBA), 1,2-dichloroethane (1,2-DCA), and ethylene dibromide. Please present the results from quarterly monitoring in the reports requested below.

#### TECHNICAL REPORT REQUEST

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

- **October 5, 2007** – Work Plan for Monitoring Well Installation
- **November 30, 2007** – Fourth Quarter 2007 Quarterly Groundwater Monitoring Report
- **February 28, 2008** – First Quarter 2008 Groundwater Monitoring Report
- **May 30, 2008** – Second Quarter 2008 Groundwater Monitoring Report
- **August 30, 2008** – Third Quarter 2008 Groundwater Monitoring 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.

#### 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

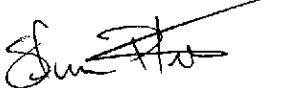
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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

cc: Kyle Emerson  
Secor International  
25684-F Business Center Drive  
Redlands, CA 92374

Donna Drogos, ACEH  
Steven Plunkett, ACEH  
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