



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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December 5, 2008

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Subject: Fuel Leak Case No. RO0002860 and GeoTracker Global ID T06019799610, Quest Laboratory, 6511 Golden Gate Drive, Dublin, CA 94568

Dear Messrs. Brown and Thompson:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Workplan for Additional Environmental Investigation," dated November 19, 2008, which was prepared by Bureau Veritas for the subject site. Bureau Veritas proposes to install three pre-packed groundwater monitoring wells at the site to "determine site-specific groundwater gradient and confirm the extent and degree of petroleum hydrocarbons found in groundwater during the prior site investigations."

ACEH generally concurs with the proposed scope of work and the proposed scope of work may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed.

TECHNICAL COMMENTS

1. **Monitoring Well Locations** – Bureau Veritas proposes to install boring MW-1 immediately adjacent to the former UST pit, install MW-2 down-gradient at the northeast corner of the subject property, and install MW-3 near the east subject property boundary, southeast and down-gradient of the former UST. The locations of monitoring wells MW-1 and MW-2 appear appropriate based on previous contaminant concentrations detected at the site. However, the location of MW-3, while down-gradient of the former UST, is currently located 110 feet east southeast of the former UST and adjacent to boring Q-12, which did not detect contaminants above the laboratory detection limit. ACEH requests that MW-3 be re-located approximately 60 feet east southeast of the former UST to just southwest of previously installed boring Q-11. Since the down-gradient extent already appears defined by boring Q-

12, the revised location of MW-3 may aid in determining groundwater contaminant plume stability in the down-gradient direction rather than being a "sentry" well. Please submit a revised figure illustrating the locations of the proposed monitoring wells by the date specified below.

2. **Pre-packed Groundwater Monitoring Wells** – As a cost savings measure, Bureau Veritas proposes to install three pre-packed groundwater monitoring wells. ACEH does not object to pre-packed monitoring well installations. However, pre-packed monitoring wells have been reported to be problematic to pressure grouting at time of monitoring well decommissioning for case closure. Therefore, you may install pre-packed wells on the condition that the wells will be over-drilled at the time of well decommissioning. Please note that over-drilling monitoring wells may have increased costs over pressure grouting monitoring wells.

3. **Soil and Groundwater Sampling Analytical Suite** – According to Bureau Veritas, soil samples collected at the site will be selected for chemical analysis based on field screening or from the depth of the likely release. ACEH requests that at least two soil samples from each boring be submitted for chemical analysis. One soil sample should be collected at the capillary fringe and the other in the vadose zone, from obvious signs of contamination determined from field screening, or the depth of the likely release. Please include TPH-d, TPH-g, BTEX, fuel oxygenates, and VOCs to the analytical suite.

Bureau Veritas proposes to analyze groundwater samples for Modified for Total Petroleum Hydrocarbons as a Multi Fuel Scan for gasoline, diesel, and motor oil (TPH-g, -d, & -mo) using USEPA Method 8015C with silica gel cleanup for TPH-d and TPH-mo. For the first groundwater monitoring event, please include BTEX, fuel oxygenates, and VOCs to the analytical suite. Based on the analytical results, groundwater samples collected in future monitoring events may be analyzed as proposed in the above-mentioned work plan.

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:

- **January 5, 2009** – Revised MW Location Figure

- **March 5, 2009** – Soil and Groundwater Investigation Report

- **April 30, 2009** – Quarterly Monitoring Report (1st Quarter 2009)

- **July 30, 2009** – Quarterly Monitoring Report (2nd Quarter 2009)
- **October 30, 2009** – Quarterly Monitoring Report (3rd Quarter 2009)
- **January 30, 2010** – Quarterly Monitoring Report (4th Quarter 2008)

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,

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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 pareskhatri@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: Donald Ashton, Bureau Veritas, 6920 Koll Center Parkway, Suite 216, Pleasanton, CA 94566
Cheryl Dizon (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551
James Yoo, Public Works Agency, 399 Elmhurst Street, Hayward, CA 94544
Donna Drogos, ACEH
Paresh Khatri, ACEH
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)