

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
8-28-06

2918

August 28, 2006

Jordan Family Trust c/o
Mr. Anthony Varni
650 A Street
Hayward, CA 94541

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

Dear Mr. Varni:

Subject: Toxics Case RO0002918, Jordan Ranch, 4233 Fallon Rd., Dublin, CA 94568

Alameda County Environmental Health (ACEH) staff has reviewed the files for the subject site including the following reports:

- August 7, 2006 Technical Comments Jordan Ranch 4233 Fallon Road Dublin, California by ICES
- August 4, 2006 Groundwater Monitoring- July 2006 Jordan Ranch 4233 Fallon Road Dublin, California
- August 7, 2006 Revised Site Mitigation Plan Jordan Ranch 4233 Fallon Road Dublin, California

These reports respond to the County's July 10, 2006 letter. We approve the Revised Site Mitigation Plan (SMP), however, we request you address the following technical comments prior to performing this work.

TECHNICAL COMMENTS

1. Perjury Statement- We note that a cover letter with a perjury statement signed by an authorized representative was not included with the submitted reports. Please include a cover letter satisfying these requirements for these and all future reports and technical documents submitted for this fuel leak case.
2. Geotracker Submission- Electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please notify our office by e mail once this submission has occurred.
3. Receptor Survey- Prior to the completion of the planned future residential development, the existing supply well on the site must be properly decommissioned.
4. Other Areas of Potential Concern- In addition to the well requirements of comment #3, please provide our office with the results of soil analysis of the sample collected from the base of the power pole and from beneath each of the stained areas as requested.
5. In the Revised ICES SMP, Figure 3 presents the revised anticipated excavation area. Will the extent of the excavation be limited due to the presence of existing buildings or extended as results dictate? Please clarify prior to starting excavation.

TECHNICAL REPORT REQUEST

Please submit the following technical reports according to the following schedule:

- 45 days after the completion of field activities- Soil and Water Investigation Report (Remedial Action Implementation Report) and soil analytical results from samples collected near power pole and beneath stained areas.
- Well Decommission Report- 45 days after submission of Soil and Water Investigation report.

ELECTRONIC SUBMITTAL OF REPORTS

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. Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was 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)).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at barney.chan@acgov.org.

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.

Mr. Anthony Varni
August 28, 2006
Page 3 of 3

If you have any questions, please call me at (510) 567-6765.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: files, D. Drogos

Mr. Derek Wong, ICES, P.O. Box 99288, Emeryville, CA 94662-9288

Mr. Aaron Ross-Swain, Standard Pacific Homes, 3825 Hopyard Road, Ste. 195,
Pleasanton, CA 94588

8_28_06 4233 Fallon Rd

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

July 10, 2006

Jordan Family Trust c/o
Mr. Anthony Varni
650 A Street
Hayward, CA 94541

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

Dear Mr. Varni:

Subject: Toxics Case RO0002918, Jordan Ranch, 4233 Fallon Rd., Dublin, CA 94568

Alameda County Environmental Health (ACEH) staff has reviewed the files for the subject site including the following reports:

- September 14, 2000 Phase I Environmental Site Assessment Jordan Ranch 4233 Fallon Road Alameda County for Shea Homes by Berlogar Geotechnical Consultants (BGC)
- January 25, 2001 Limited Phase II Environmental Site Assessment Jordan Ranch 4233 Fallon Road Alameda County, California for Shea Homes by Berlogar Geotechnical Consultants (BGC)
- March 13, 2006 Supplementary Site Investigation Jordan Ranch 4233 Fallon Road Dublin, California by ICES
- June 16, 2006 Soil and Groundwater Quality Investigation Jordan Ranch 4233 Fallon Road Dublin, California by Northgate Environmental Management, Inc.
- March 15, 2006 Site Mitigation Plan Jordan Ranch 4233 Fallon Road Dublin, California by ICES

The ICES March 15, 2006 report proposes as the Site Mitigation Plan, the excavation of impacted soil and extraction of groundwater. We have the following observations and technical concerns we request you address prior to performing this work.

TECHNICAL COMMENTS

1. 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.
2. Please perform a conduit study/sensitive receptor survey for the site including those receptors within a ¼ mile radius of this site. This should include a detailed well survey including information on the previously identified on-site well. Please evaluate the probability of MTBE encountering preferential pathways and conduits through lateral and vertical migration.

3. Though the primary release appears to have been from the former fuel underground storage tank (UST) at the site, we request you address all other non-UST areas of concern identified in the Phase I report. This includes the status of the well identified ~300' northeast of the ranch house, the closure of the two septic systems associated with the former homes at the site, the power pole transformer, oil stains observed beneath tractors and bulldozers, the 55 gallon drums with observed petroleum releases to soil north of Barn #2 and the circular zones. Please provide a figure indicating the locations of these areas and describe how each was or will be evaluated.
4. The Northgate report appears incomplete. A figure indicating the locations of the shallow soil sample collected for pesticides and herbicides analysis was not included. In addition, analysis of soil samples from the borings for monitoring wells MW-1-MW-5 was not provided. Please provide this additional technical information.
5. The gradient was determined to be south in the December 05 sampling, is this the only monitoring events were performed on the Northgate wells? Is this gradient consistent with what would be expected in this area? What is the status of these wells? We recommend an additional sampling event for these wells if they are still viable for the parameters; TPHg, TPHd, and by EPA 8260, BTEX, MTBE, TAME, ETBE, DIPE, TBA, EDB and EDC and VOCs.
6. In the ICES SMP, Figure 3 is presented as the extent of impacted area. We request that you provide a detailed figure justifying the impacted soil and groundwater areas. Iso-concentration contours and analytical results should be shown. It appears that Figure 3 represents the groundwater impact area, not the soil impacted area. Please revise Figure 3 to illustrate the soil impacted/proposed excavation area.
7. Excavated soil is to be aerated, re-sampled and, providing it meets soil Residential ESLs where groundwater is a potential source of drinking water, reused as backfill. Although we do not believe aeration would be successful in remediating diesel contamination, we concur with these remedial goals. Please note that the proposed cleanup level in Table 1 for benzene is incorrect. The correct value should be 0.044 ppm. Your sampling of excavated soil should follow the guidelines of the SFRWQCB document, Characterization & Reuse of Petroleum Hydrocarbon Impacted Soil as Inert Waste.
8. The proposed sampling plan for the excavation pit should be changed. One floor sample per every 400 square feet is recommended. The floor samples should be discrete samples and take into account existing "hotspots". Sidewall samples, one per every 25 linear feet is acceptable, however, one sample every 10 vertical feet should be taken for analysis, in addition to any visual or odor impacted areas.
9. Post excavation groundwater sampling should be done in a manner representative of actual groundwater conditions. Therefore, we request that groundwater samples be collected from areas of known impact ie near the former UST pit and down-gradient. Samples should be collected from slotted casing ie temporary wells installed into the saturated soils.

TECHNICAL REPORT REQUEST

Please submit the following technical reports according to the following schedule:

- August 7, 2006- Conduit/Receptor Survey, addressing of non-UST areas of concern with figure, additional Northgate technical information, revised figures for soil and groundwater area impact and confirmation of post-excavation soil and groundwater sampling methods.
- August 7, 2006- Groundwater Monitoring Report
- Perjury Statement should accompany all submitted reports. Please insure that the next report includes such a statement and also references the prior ICES March 15, 2006 Site Mitigation Plan.

ELECTRONIC SUBMITTAL OF REPORTS

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was 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).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at barney.chan@acgov.org.

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

Mr. Anthony Varni
July 10, 2006
Page 4 of 4

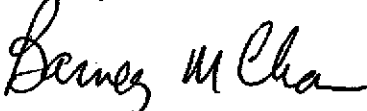
recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

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) 567-6765.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: files, D. Drogos

Mr. Derek Wong, ICES, P.O. Box 99288, Emeryville, CA 94662-9288

Mr. Aaron Ross-Swain, Standard Pacific Homes, 3825 Hopyard Road, Ste. 195,
Pleasanton, CA 94588

7_10_06 4233 Fallon Rd