

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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January 3, 2008

Ms. Diana Pagano
6912 Broadway Terrace
Oakland, CA 94611-1924

Subject: Fuel Leak Case No. RO0002925 Global ID#T0600102165, Quality Tune Up, 14901 East 14th Street, San Leandro, CA

Dear Ms. Pagano:

Alameda County Environmental Health Department (ACEH) staff has reviewed the case file and the report entitled, "Draft Remedial Action Plan (RAP)," and "Additional Soil and Groundwater Investigation," Dated October 12, 2007 and May 2007 and prepared on your behalf by Ninyo & Moore. Results from the soil and groundwater investigation indicate that soil and groundwater beneath your site were impacted because of an unauthorized release of TPH. Ninyo & Moore has evaluated several remedial options including natural attenuation, soil over-excavation, in-situ remediation, and mechanical remediation by a combination of groundwater extraction and soil vapor extraction.

The scope of work in the RAP proposes the excavation of soil impacted by petroleum hydrocarbon contamination. Once soil excavation has been completed, groundwater monitoring wells will be installed to monitor the effectiveness of the remediation effort. ACEH generally agrees with the proposed remedial action recommended by Ninyo & Moore.

We request that you perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to steven.plunkett@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Soil and Groundwater Investigation Results.** Results from the recently completed soil and groundwater investigation indicate that residual TPHg and TPHd were detected in the subsurface beneath your site. Soil and groundwater data indicate that residual contamination left in place after the UST removal may continue to add mass to the dissolved groundwater contamination plume. Dissolved phase TPHg and TPHd were detected in groundwater at concentrations of up to 2,200 µg/L and 10,000 µg/L, respectively. While low levels of TPHg and TPHd were detected in soil beneath the former UST tank pit. During the investigation, benzene and MtBE were not detected in soil or groundwater above laboratory detection limits.
2. **Source Area Soil Removal.** Ninyo & Moore has evaluated several remedial alternatives to reduce residual contamination in the source area beneath the site; the selected remedial option is targeted removal of TPH impacted soil. Several areas have been targeted for over-excavation including the three former fuel dispenser islands and the former UST tank pit.

ACEH concurs with the recommendation to excavate residual soil contamination in the source area. Additionally, use of the Regional Water Quality Control Board Environmental Screening Levels as cleanup goals is acceptable. Provided that residential a land use scenario and a potential drinking water resource are considered. Please present results from the remedial action in the report requested below.

- 3. Proposed Monitoring Well Locations for Verification Monitoring.** Currently, no groundwater monitoring wells have been installed at your site. To monitor the efficacy of the remedial action, 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.

ACEH generally agrees with the monitoring well locations as proposed in the RAP; however, we request one additional monitoring well must be installed approximately midway between soil boring NM-14 and NW-18. Please present your rationale for the proposed monitoring well locations and well construction in the Work Plan requested below.

- 4. Soil Sampling and Analysis.** ACEH requests that soil samples are to be collected at any interval where staining, odor or elevated PID readings are observed. Additional soil samples are to be collected at the capillary fringe, changes in lithology and at the total depth of the monitoring well. Soil samples are to be submitted for TPHg and TPHd by EPA Method 8015M or 8260, BTEX, EDB, EDC, MIBE, TAME, ETBE, DIPE, TBA and EtOH by EPA Method 8260. Please present the results from soil sampling in the Well Installation report requested below.
- 5. Groundwater Sampling.** ACEH requests that after groundwater monitoring wells have been installed and properly developed, groundwater sampling must be implemented. TPHg and TPHd by EPA Method 8015M or 8260, BTEX, EDB, EDC, MIBE, TAME, ETBE, DIPE, TBA and EtOH by EPA Method 8260. Results from groundwater sampling shall be presented in the Quarterly Monitoring report requested below.
- 6. Geotracker Submissions.** During our customary review of the State Water Resources Control Board Geotracker website, we have found that the requisite documents have not been submitted to the Geotracker database. ACEH requests that all documents pertinent to this case must be submitted to Geotracker by January 21, 2007. Please submit the Soil and Groundwater Investigation Report and the Remedial Action Plan dated May 2007 and October 12, 2007, respectively. Provide ACEH with documentation that the previously mentioned reports have been submitted to the Geotracker database.

TECHNICAL REPORT REQUEST

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

- **February 15, 2007** – Interim Remedial Action Report
- **February 30, 2008** – Work Plan for Monitoring Well Installation Report
- **March 30, 2008** – 1st Quarter 2008 Groundwater Monitoring and Sampling Report
- **June 30, 2008** – 2nd Quarter 2008 Groundwater Monitoring and Sampling Report
- **September 30, 2008** – 3rd Quarter 2008 Groundwater Monitoring and Sampling Report
- **December 30, 2008** – 4th Quarter 2008 Groundwater Monitoring and Sampling 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.

ELECTRONIC SUBMITTAL OF REPORTS

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).

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.

Should you have any questions, do not hesitate to call me at (510) 383-1767.

Sincerely,



Steven Plunkett
Hazardous Materials Specialist

Cc: Mr. Austine Osakwe
City of San Leandro
Engineering and Transportation Department
835 E 14th Street
San Leandro, CA 94577

Kris Larson
Ninyo & Moore
1956 Webster Street, Suite 400
Oakland, CA 94612

Karl Busche
City of San Leandro Environmental Service Division
Civic Center, 835 East 14th Street
San Leandro, CA 94577

Donna Drogos, ACEH, Steven Plunkett, ACEH, File