

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION
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December 14, 2007

Ms. Beverly Adamo
Livermore Amador Valley Transit Authority
1362 Rutan Drive, #100
Livermore, CA 94551

Subject: SLIC Case RO0002943 and Geotracker Global ID SLT19742527, Livermore Amador Valley Transit Authority, 1362 Rutan Drive, Livermore, CA 94551 – Work Plan Approval

Dear Ms. Adamo:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above-referenced site, including the document entitled, "Work Plan – Limited Subsurface Soil Boring Investigation," dated November 27, 2007 and prepared on your behalf by ACC Environmental Consultants. The Work Plan proposes four soil borings and one possible step-out boring in the area of a former remote waste oil drain. The proposed scope of work may be implemented provided that the technical comments below are addressed and incorporated during the proposed field investigation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan or technical comments below is proposed.

We request that you address the technical comments below, perform the proposed work and send us the reports described below.

TECHNICAL COMMENTS

1. **Minimum Number of Borings.** The proposal to advance a minimum of four soil borings with an optional fifth boring as a step out boring from any boring exhibiting field evidence of waste oil impact is acceptable.
2. **Soil Sampling.** The soil borings are to be sampled continuously for logging and screening purposes. A minimum of two soil samples are to be collected for laboratory analysis from each soil boring. Soil samples are to be collected for laboratory analysis from any zones where visible staining, odor, or elevated PID readings are observed. If visible staining, odor, or elevated PID readings are observed, a sufficient number of soil samples must be collected to characterize the vertical interval over which the contamination occurs. If no visible staining, odor, or elevated PID readings are observed, the collection of soil samples at fixed depths as shown on Table 1 is acceptable. However, we request that the shallowest soil sample in each boring be collected from 2.5 to 3.0 feet bgs rather than 3.5 to 4.0 feet bgs. Please present the soil boring logs and results in the Site Investigation Report requested below.

3. **Soil Disposal Documentation.** Please provide documentation of the disposal of soil from the December 2006 waste oil drain removal and excavation in the Site Investigation report requested below.
4. **Groundwater Sampling.** The collection of one grab groundwater sample from first encountered groundwater in soil boring B-4 is acceptable. However, the condition that a grab groundwater sample will be collected only if groundwater is encountered less than 24 feet bgs is not acceptable. The collection of a grab groundwater sample to assess whether groundwater has been impacted is one of the primary purposes of the investigation. Soil boring B-4 must be extended deep enough to collect a grab groundwater sample from first-encountered groundwater. If boring B-4 meets refusal prior to reaching groundwater, an alternate drilling method must be implemented in order to collect a grab groundwater sample.
5. **Laboratory Analysis for Groundwater Sample.** In addition to analyses for Total Petroleum Hydrocarbons (TPH) as diesel and motor oil using EPA Method 8015, we request that the grab groundwater sample also be analyzed for TPH as gasoline and full scan VOCs including chlorinated solvents using EPA Method 8260. Please present the results in the Site Investigation Report requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **March 28, 2008 – Site Investigation 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

Ms. Beverly Adamo
RO0002943
December 14, 2007
Page 3

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.

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) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

Ms. Beverly Adamo
RO0002943
December 14, 2007
Page 4

cc: Cheryl Dizon, QIC 80201
Zone 7 Water Agency
100 North Canyons Parkway
Livermore, CA 94551

Danielle Stefani
Livermore-Pleasanton Fire Department
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Donna Drogos, ACEH
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File