



ENVIRONMENTAL HEALTH DEPARTMENT  
ENVIRONMENTAL PROTECTION  
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January 6, 2011

Terri Costello  
Betty J. Woolverton Trust  
12 Meadowlark Court  
Danville, CA 94526

Patrick Costello (*Sent via E-mail to: [chevypat@aol.com](mailto:chevypat@aol.com)*)  
Crown Chevrolet  
P.O. Box 2010  
Dublin, CA 94568

Subject: Site Investigation for Fuel Leak Case No. RO0003014 and GeoTracker Global ID T10000001616, Crown Chevrolet Cadillac Isuzu, 7544 Dublin Boulevard, Dublin, CA 94568

Dear Ms. Costello and Mr. Costello:

Thank you for the recently submitted document entitled, "Soil and Groundwater Investigation Report," dated November 16, 2010, which was prepared by AMEC Geomatrix, Inc. (AMEC) for the subject site. Alameda County Environmental Health (ACEH) staff has reviewed the case file including the above-mentioned report for the above-referenced site. Twelve borings were installed to characterize previously detected elevated concentrations of petroleum hydrocarbons. Soil sample analytical results detected TPH-g at 1,200 mg/kg, which AMEC states appear to be related to non-gasoline VOCs in the sample, and TPH-d at a concentration of 2.6 mg/kg. However, elevated concentrations of VOCs were detected in soil samples collected from boring SB-03 located near the sump area. Groundwater sample analytical results detected TPH-g at a concentration of 63 µg/L, but did not detect TPH-d and TPH-mo above the laboratory reporting limit. AMEC attributes the previous hydrocarbon detections on sampling methodology and the omission of silica gel cleanup. AMEC also recommends that a limited excavation be performed in the area of the sump and dewatering to reduce the VOC mass.

ACEH generally concurs with the proposed scope of work related to the elevated concentrations of VOCs detected at the site. However, adequate justification and/or discussion for the use of silica gel cleanup related to the petroleum hydrocarbon contamination were not presented. Also, analytical results presented in Table 2 in the above-mentioned report contained PAHs data that were reported as milligrams per kilogram (mg/kg) but do not appear to have been converted from micrograms per kilogram (µg/kg) as reported in the laboratory analytical data. Hence, it appears that recommendations and conclusions may have been based on data with incorrect units and

erroneous comparisons to Regional Water Quality Control Board's (RWQCB) Environmental Screening Levels (ESLs) Therefore, an adequate evaluation of the report could not be performed at this time. ACEH requests that you address the following technical comments and send us a Report addendum/revised report as requested below.

### **TECHNICAL COMMENTS**

1. **Silica Gel Cleanup** – As mentioned above, elevated concentrations of petroleum hydrocarbons were previously detected at the site. Specifically, analytical results detected total petroleum hydrocarbons (TPH) as motor oil (mo) at a concentration of 49,000 micrograms per liter ( $\mu\text{g/L}$ ) in a “grab” groundwater sample collected from boring B2-W. Groundwater sample analytical results from this most recent investigation did not detect TPH-d or TPH-mo above the laboratory reporting limit. AMEC attributes the results to the sampling methodology (dual tube sampler) and use of silica gel cleanup to prepare the samples.

ACEH's understanding is the silica gel cleanup is used to prepare the sample to remove interference from polar biogenic (organic) material that may be present in the sample in situations where elevated concentrations of TPH have been detected but BTEX and PAHs have been absent. Typically, sites with high organic material are located around the San Francisco Bay margin, or water bodies which sustained or once sustained organic matter. With that being said, based on the sloping topography, it appears that the subject site is located within alluvial fan deposits which are located east of the Dublin hills, where high organic material content would not typically be expected. Therefore, the use of silica gel cleanup does not appear adequately justified.

Additionally, concentrations of naphthalene were detected in many soil samples collected at the site. Since naphthalene is a known component of TPH-d, it may be hypothesized that perhaps TPH-d contamination may be present at the site and the use of silica gel cleanup have biased the results. Please address the above mentioned concerns and submit a revised report due by the date specified below.

2. **Soil and Groundwater Characterization in the Sump Area** – AMEC recommends “limited excavation be performed in the area of the sump in order to remove accessible soil containing VOCs, and dewatering in conjunction with the excavation to reduce the mass of VOCs in groundwater.” However, it does not appear that the vertical and lateral extent of VOC contamination is defined in soil or groundwater at this time. Although an excavation may remove a majority of impacted soil, the extent of potential groundwater impact will remain uncharacterized. Please prepare a scope of work to address the above mentioned concerns and a work plan due by the date specified below.

### **TECHNICAL REPORT REQUEST**

Please submit technical reports to ACEH (Attention: Paresh Khatri), according to the following schedule:

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- **March 7, 2011** – Soil and Water Investigation Report (Revised)
- **March 7, 2011** – Soil and Water Investigation Work Plan

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 777-2478 or send me an electronic mail message at [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org).

Sincerely,

Paresh C. Khatri  
Hazardous Materials Specialist

Enclosure: Responsible Party(ies) Legal Requirements/Obligations  
ACEH Electronic Report Upload (ftp) Instructions

cc: Edward P. Conti, AMEC Geomatrix, 2101 Webster Street, 12<sup>th</sup> Floor, Oakland, CA 94612  
Avery Patton, AMEC Geomatrix, 2101 Webster Street, 12<sup>th</sup> Floor, Oakland, CA 94612 (Sent via E-mail to: [Avery.Patton@amec.com](mailto:Avery.Patton@amec.com))  
Cheryl Dizon (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551 (Sent via e-mail to: [cdizon@zone7water.com](mailto:cdizon@zone7water.com))  
Donna Drogos, ACEH (Sent via E-mail to: [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org))  
Paresh Khatri, ACEH (Sent via E-mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org))  
GeoTracker  
File

## Responsible Party(ies) Legal Requirements/Obligations

### REPORT REQUESTS

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](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, 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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> July 20, 2010
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

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

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection.**
- 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)

## 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](mailto:dehloptoxic@acgov.org)
  - 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, Safari, and Firefox browsers will not open the FTP site.
  - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
  - 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](mailto: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 @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) If site is a new case without an RO#, use the street address instead.
  - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.