



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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July 7, 2011

Eugene and Shirley Macedo Trust
c/o Matt Macedo
2995 Taylor Way
Byron, CA 94514

Subject: Review of Site Characterization Report for Fuel Leak Case No. RO0003073 and GeoTracker Global ID T10000002919, Geno Country Store, 1000 North Vasco Road, Livermore, CA 94551

Dear Mr. Macedo:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted document entitled, "*Site Characterization Report*," dated June 17, 2011 (Report). The Report, which was prepared by Engeo Incorporated, presents results from soil, soil vapor, and groundwater sampling to characterize several environmental concerns at the site. The results from the Report were also discussed during a meeting on July 6, 2011 between Mr. Scott Menard of Arbor Development Group, Mr. Jeff Adams and Shawn Munger of Engeo, and Jerry Wickham of ACEH.

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

TECHNICAL COMMENTS

1. **Total Petroleum Hydrocarbons in Soil Gas.** Total petroleum hydrocarbons as gasoline (TPHg) were detected in soil gas at each of the 12 soil gas sampling locations at concentrations ranging from 2,800 to 31,000 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). The concentration of TPHg exceeded the Environmental Screening Level (ESL) for residential land use of $10,000 \mu\text{g}/\text{m}^3$ (San Francisco Bay Regional Water Quality Control Board, May 2008) at 10 of the 12 sampling locations. The sampling locations with TPHg concentrations exceeding the ESLs were widely distributed across the site and were not limited to the known source areas. The source of the TPHg at similar over a wide area of the site is unknown. We request that you conduct additional assessment to identify the source and specific TPH fraction represented by the soil vapor data and the potential for the TPHg to pose a risk for vapor intrusion. During the July 6, 2011 meeting, re-sampling of the soil vapor probes with additional laboratory analyses to further characterize the TPHg was discussed. Please present data from additional sampling and analysis of the soil vapor probes in the Site Characterization Report Addendum requested below.
2. **Tetrachloroethene (PCE) in Soil Gas.** The volatile organic compounds (VOCs) tetrachloroethene (PCE) and trichloroethene (TCE) were detected in soil vapor samples collected at the site in May 2011. The concentration of PCE in soil vapor exceeded the California Human Health Screening Level (CHHSL) of $180 \mu\text{g}/\text{m}^3$ (Office of Environmental Health Hazard Assessment, September 2010) at 4 of the 12 sampling locations. The concentration of PCE in soil vapor exceeded the ESL of $410 \mu\text{g}/\text{m}^3$ at 1 of the 12 sampling locations. The Report suggests that PCE and TCE originate from an off-site source upgradient of the site. However, PCE was not detected in grab groundwater samples

at concentrations above the reporting limit. The Report also compares the concentrations of PCE in soil vapor to a 95 percent Upper Confidence Limit (UCL). The UCL represents an estimate of the mean concentration for the site. We do not concur that comparison of a 95 percent UCL to screening levels is protective of human health for this site since potential exposure to vapor intrusion occurs within individual homes and is not an average exposure over the entire site. In conjunction with the re-sampling of the soil vapor probes with additional laboratory analyses to further characterize the TPHg discussed in technical comment 1, we request that you include analysis for VOCs in soil vapor. Please present data from additional sampling and analysis of the soil vapor probes in the Site Characterization Report Addendum requested below.

3. **Off-Site Well.** A well survey conducted for the site identified a water supply well (2S/2E 35L2) immediately northwest of the site. The well is reportedly used for irrigation. We request that you provide additional information from the well owner on the past, current, and future use of the well. The well is also to be sampled to assess whether fuel leaks or chlorinated solvents have impacted the water supply well. The water sample is to be analyzed for TPHg and TPHd using EPA Method 5035/8015B and VOCs (full scan including chlorinated solvents) using EPA Method 5035/8260B. Please present the information and sampling data for the water supply well in the Site Characterization Report Addendum requested below.
4. **Interim Removal Action.** The Report proposes preparation of a remedial work plan for excavation of the sources area. In general, excavation may be more appropriate after completion of site characterization activities since the full scope of cleanup is better understood. However, you may submit a Work Plan for excavation of the source area in order to achieve other logistical objectives for the site with the understanding that additional cleanup activities could be required in the future.
5. **Unauthorized Release Form.** Please submit an Unauthorized Release Form to document the discovery of the leak from the UST system at the site. This form can be found on the State Water Resources Control Board website.
6. **GeoTracker Requirements.** Review of the State's GeoTracker database indicates that the site still has not been claimed. Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3893, 3894, and 3895, you are required to claim your site and subsequently transmit electronic reports and other site data. Your site is currently out of compliance with these requirements. Please claim the site and upload all technical reports no later than August 8, 2011 in order for the site to achieve compliance with directives from this agency.

TECHNICAL REPORT REQUEST

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

- **September 8, 2011** – Site Characterization Report Addendum

Matt Macedo
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If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org. Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Sincerely,

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

Attachment: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Danielle Stefani, Livermore Pleasanton Fire Department, 3560 Nevada St, Pleasanton, CA 94566
(Sent via E-mail to: dstefani@lpfire.org)

Cheryl Dizon (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551
(Sent via E-mail to: cdizon@zone7water.com)

Scott Menard, Arbor Development Group, LLC, 3650 Mount Diablo Blvd., Suite 200, Lafayette, CA 94549 (Sent via E-mail to: smenard@arbordevelopmentgroup.com)

Jeff Adams, Engeo, Incorporated, 2010 Crow Canyon Place, Suite 250, San Ramon, CA 94583
(Sent via E-mail to: jadams@engeo.com)

Donna Drogos, ACEH (Sent via E-mail to: donna.drogos@acgov.org)
Jerry Wickham, ACEH (Sent via E-mail to: jerry.wickham@acgov.org)

GeoTracker, eFile

Attachment 1

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.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: 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 deh.loptoxic@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 as they are NOT being supported at this time.
 - 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 deh.loptoxic@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.