

From: [Detterman, Karel, Env. Health](#)
To: "[Mary Cotter](#)"; neil.cotter@comcast.net; "trisargil@aol.com"; "coyleamc@gmail.com"
Cc: "[Garner, Des](#)"; "[Skov, Erik](#)"; "lgriffin@oaklandnet.com"; [Roe, Dilan, Env. Health](#); [Drogos, Donna, Env. Health](#); [dehloptoxic, Env. Health](#)
Subject: RO27: Approval of Site Investigation Work Plan; Fuel Leak Case No. RO27 and GeoTracker Global ID T06000102106, Grove Street Wash Rack, 3884 Martin Luther King, Jr. Way, Oakland, CA 94609
Date: Monday, July 08, 2013 6:03:14 PM
Attachments: [Attachment 1 and ftpUploadInstructions 2012 07 25.pdf](#)

Dear Ladies and Gentlemen:

Alameda County Environmental Health Department (ACEH) staff has reviewed the case file, including the *Site Investigation Work Plan* (Work Plan), dated July 5, 2013 prepared and submitted on your behalf by URS Corporation (URS). The July 5, 2013 Work Plan was revised based on meetings held on May 23 and June 5, 2013 with ACEH, URS, and the Cotters. Thank you for submitting the report. The Work Plan proposes the installation of eleven soil borings and the installation of five groundwater monitoring wells to delineate the horizontal and vertical extent of petroleum hydrocarbon contamination in shallow soil and groundwater. ACEH understands that the site is to be redeveloped for residential and commercial use and the top approximately 12 feet is to be excavated across the entire site for an underground parking garage.

Based on ACEH staff review of the work plan the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed field investigation. Submittal of a revised work plan or a work plan addendum 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 following technical comments, 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: karel.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- 1. Well Screen and Sand Pack Interval** – The Work Plan indicates that “it is anticipated the well screens will be set between approximately 10 to 20 feet below ground surface depth with 5 to 10 feet of 0.010-inch machine-slotted well screen...The filter pack material will be brought to approximately 0.5 foot above the screened interval”. As discussed during our May 23, 2013 meeting, ACEH recommends the use of monitoring wells designed to have a total length of screen interval and sand pack of no more than seven feet because a well with a shorter screen interval will be more likely to provide samples representative of depth discrete groundwater conditions.
- 2. Groundwater Monitoring and Sampling Program** - Please note that the newly installed wells are required to be sampled on a quarterly basis for a minimum of one year after installation, and that a reduced sampling interval may thereafter be appropriate depending on analytical results.
- 3. Soil and Groundwater Investigation Report** – Please present the work plan investigation results in a soil and groundwater investigation report that is appended to a draft Feasibility Study/Corrective Action Plan (FS/CAP). The draft FS/CAP should also include contamination cleanup levels and cleanup goals, in accordance with the San Francisco Regional Water Quality Control Board (SFRWQCB) Basin Plan and appropriate ESL guidance for all COCs and for the appropriate groundwater designation. Please note that soil cleanup levels should ultimately (within a reasonable timeframe) achieve water quality objectives (cleanup goals) for groundwater in accordance with the SFRWQCB Basin Plan. Please propose appropriate cleanup levels and cleanup goals, and the time frame necessary to reach those goals, in accordance with 23 CCR Section 2725, 2726, and 2727 in the FS/CAP.

The FS/CAP must evaluate at least three viable alternatives for remedying or mitigating the actual or potential adverse effects of the unauthorized release(s) besides the “no action” and “monitored natural attenuation” remedial alternatives. Each alternative shall be evaluated not only for cost-effectiveness but also its timeframe to reach cleanup levels and cleanup goals, and ultimately the Responsible Party must propose the most cost-effective corrective action.

Public participation is a requirement for the CAP process. Once the fact sheet has been approved, public comments on the proposed remediation will be accepted for a period of thirty days. Following the public comment period, the comments received including ACEH's comments described below, must be addressed and incorporated into a Final CAP. Please submit the FS/CAP by the date specified below.

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TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with Attachment 1 and the following specified file naming convention and schedule:

- **August 30, 2013** – Draft FS/CAP
File to be named: RO27_FEASSTUD_CAP_R_yyyy-mm-dd
- **September 20, 2013** – Third Quarter Groundwater Monitoring Report
File to be named: RO27_GWM_R_yyyy-mm-dd
- **December 20, 2013** – Fourth Quarter Groundwater Monitoring Report
File to be named: RO27_GWM_R_yyyy-mm-dd

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.

Should you have any questions, please contact me at (510) 567-6708 or send me an electronic mail message at karel.detterman@acgov.org

Sincerely,

Karel Detterman, PG
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
Direct: 510.567.6708
Fax: 510.337.9335
Email: karel.detterman@acgov.org

PDF copies of case files can be downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>

Enclosures: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations
ACEH Electronic Report Upload (ftp) Instructions