

From: [Detterman, Karel, Env. Health](#)
To: ["paulsappal@yahoo.com"](mailto:paulsappal@yahoo.com); ["Gowri"](#); ["Scott"](#)
Cc: [Roe, Dilan, Env. Health](#)
Subject: Fuel Leak Case No. RO0000127, Alaska Gasoline Station, GeoTracker Global ID T0600101804, 6211 San Pablo Avenue, Oakland, CA 94608
Date: Friday, August 29, 2014 5:44:33 PM
Attachments: [SCM-Data Gap Work Plan Sample Table.docx](#)
[Attachment A SCM Table.pdf](#)

Hello Everyone:

Thank you for participating in the meeting held at Alameda County Environmental Health's (ACEH) offices on July 29, 2014 attended by the Responsible Party, Mr. Pritpaul Sappal, and representatives from Stratus Environmental, Inc. (Stratus), the RP's consultant. The purpose of the meeting was to briefly discuss the status of the site and to identify the next steps to progress the case to closure. ACEH staff has reviewed the case file in conjunction with the State Water Resources Control Board's (SWRCB) Low Threat Underground Storage Tank Case Closure Policy (LTCP).

The following bulleted list summarizes the main topics discussed during the meeting:

1. Stratus provided a general background summary of historical work activities including the 2004 UST removal and excavation and 2011 overexcavation;
2. Discussion of potential data gaps in each of the three LTCP's Media Specific Media:
 - a. LTCP's Media Specific Media – Groundwater:
 1. Declining TPH concentrations in on-site groundwater monitoring wells, probably due to site excavation and extensive source removal;
 2. Discussed potential relationship between elevated and increasing Gasoline-Range Organics (GRO) and tert butyl alcohol (TBA) concentrations with respect to the location and screen intervals of two off-site down gradient wells MW-7 and MW-8, location of underground utility corridors adjacent to the site, and possible off-site sources;
 3. Discussed Environmental Screening Levels (ESLs) for TBA including potential impact to surface water bodies;
 - b. LTCP's Media Specific Media - Vapor Intrusion (VI) – both on-and off-site:
 1. The site is exempt from VI on-site because it is an active gas station;
 2. The site appears to lack a 5 feet below ground surface (bgs) bioattenuation zone as saturated soils were encountered at a depth of 5 feet bgs in soil borings and at 0.95 feet bgs in MW-10;
 - c. LTCP's Media Specific Media - Direct Contact to Outdoor Air:
 1. Two excavation events (2004 and 2011) have removed significant on-site source material from 12-16 feet below ground surface;

Based on the discussions during our meeting, ACEH requests that you address the following Technical Comments and submit the requested reports by the dates provided below.

TECHNICAL COMMENTS

1. **Well Survey** – Please update the 2008 well survey using data from the Alameda County Public Works Agency (ACPWA) and Department of Water Resources (DWR) and list the wells in a table and a figure.
2. **Site Conceptual Model (SCM)** – Please prepare a SCM in a tabular form by synthesizing existing site data into the attached Word document template, including the updated well survey. Please prepare tables summarizing historical soil and groundwater analytical results including sample depths, detection limits, if sample result is not detected/less than the detection limit; provide a figure with all sample locations; indicate in grey sample locations

and results removed by excavation activities. Please submit the report as requested below.

3. **LTCP's Technical Justification for Groundwater Media-Specific Criteria** – Please estimate the GRO and benzene plume lengths in conjunction with an updated 2,000 foot well survey radius from the ACPWA and DWR and submit the report as an appendix of the SCM requested below.
4. **Johnson-Ettinger (J-E) Model Sensitivity Analysis** – Please prepare a J-E Model sensitivity analysis to estimate off-site VI risk using current groundwater contaminant data and submit the report as an appendix of the SCM requested below.

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, according to Attachment 1 and the following specified file naming convention and schedule:

- **October 30, 2014** – Site Conceptual Model including the Sensitivity Analysis and plume lengths
File to be named: RO127_SCM_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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please send me an e-mail message at karel.detterman@acgov.org or call me at (510) 567-6708.

Karel Detterman, PG
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
Direct: 510.567.6708
Fax: 510.337.93350.

Email: karel.detterman@acgov.org

PDF copies of case files can be downloaded at:

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