

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

COLLEEN CHAWLA, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP) FOR
HAZARDOUS MATERIALS RELEASES
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September 25, 2018

Mr. Ed Hemmat and Mr. Mehrdad Dokhanchy
PO Box 11390
Oakland, CA 94611-0390
(Sent via electronic mail to:
edhemmat@gmail.com and
mehrdad.dokhanchy@comcast.net

Award Motors Inc.
210 Scenic Dr.
Piedmont, CA 94611
Attention: Jacki Li

Ms. Rita Robinson
13199 Skyline Blvd.
Oakland, CA 94619

Mr. Donald Rosenberg
2740 Ptarmigan Dr.
Walnut Creek, CA 94595-3121

Exchange Support Services, Inc.
Attention: Lloyd Kendall Jr
Address Unknown

Subject: Work Plan Review, Fuel Leak Case No. RO0000182 and GeoTracker Global ID T06019784055, Robinson Property / Mohawk Oil Co., 5630 San Pablo Ave., Oakland, CA 94608

Dear Responsible Parties:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file and the recently submitted document entitled *Cleanup Program Data Gap Investigation Workplan (Work Plan)*, dated July 18, 2018 and prepared by Pangea Environmental Services, Inc. (Pangea) for the subject site. ACDEH understands the site is the location of proposed redevelopment consisting of a five-story mixed-use structure with the upper four floors designated for residential occupancy.

The Work Plan presents a site conceptual model (SCM), identifies data gaps to be addressed for case closure, and proposes steps to address the data gaps. In the Work Plan, Pangea proposes to advance a total of three soil bores and two soil gas probes. As presented in the SCM, two of the soil bores are proposed between the potential preferential pathway conduits (sanitary sewer and storm drain utilities) and the area exhibiting the highest hydrocarbon impacts to groundwater, and one soil bore to be located in the hoist area. Pangea indicates the soil gas probes will be installed within the footprint of the proposed building.

ACDEH has evaluated the data and recommendations presented in the above-mentioned report. Based on ACDEH staff review, we have noted inconsistencies between the text of the Work Plan and the SCM presented in table format in Appendix D. Therefore, ACDEH requests that you prepare a Revised Data Gap Investigation Work Plan to address the Technical Comments provided below.

TECHNICAL COMMENTS

- 1. Local sub element- Site Conceptual Model** – Pangea states groundwater monitoring well STWM-1 (stet) was found to have a broken casing and is not used in the groundwater gradient calculation. According to the SCM, the broken casing is not identified as a data gap. If the casing break short circuits the well screen and/or sanitary seal, ACDEH considers this a data gap. The well should be repaired or, if warranted, the well destroyed and replaced. Please address the nature of the broken casing and the suitability of the well to remain in the monitoring well network in the Revised Data Gap Investigation Work Plan requested below.
- 2. Nearby Wells sub element- Site Conceptual Model** – The State Water Resources Control Board's (SWRCBs) Groundwater Ambient Monitoring & Assessment (GAMA) program database was reviewed for supply wells in the vicinity of the site. Pangea proposes no further action as the closest supply well identified in GAMA is 2.2 miles from the site.

ACDEH requests a search of the California Department of Water Resources (DWR) and the Alameda County Public Works Agency (ACPWA) databases for nearby wells. ACDEH notes that Sanborn maps, provided in Appendix C, and Figure 5, *Locations of Water Wells in 1910*, of the East Bay Plain Groundwater Basin Beneficial Use Evaluation Report, Alameda and Contra Costa Counties, CA 1999, California Regional Water Quality Control Board Groundwater Committee, June 1999, provide evidence that domestic supply wells may have been located within the vicinity of the site. ACDEH requests the additional review for supply wells be addressed in the Revised Data Gap Investigation Work Plan requested below.

3. Preferential Pathway Evaluation sub element- Site Conceptual Model – As indicated above, Pangea proposes advancing two soil bores between the sanitary sewer/ storm drain utilities and the area exhibiting the highest hydrocarbon impacts to groundwater. ACDEH notes that Figure 9 of the Work Plan depicts three proposed soil bore locations, none of which are depicted in locations consistent with that described in this SCM sub element. ACDEH requests clarification of the bore locations proposed to address this sub element in the Revised Data Gap Investigation Work Plan requested below.

4. Contaminant Source and Release Information – Chemicals of Concern sub element Site Conceptual Model – Identifies total petroleum hydrocarbons (TPH) as gasoline (TPHg), TPH as diesel (TPHd) and benzene, toluene, ethylbenzene, and xylenes (collectively BTEX) compounds as the chemicals of concern. As presented in the Land Use and Site History sub element of the SCM, a gas station was constructed and began operating in 1925 and the property used as a gas station and automobile repair facility until the mid-1960s. ACDEH notes that, other than petroleum hydrocarbons, site soil has not been analyzed for the presence of contaminants associated with vehicle repair. As specified in the SCM, Pangea proposes to analyze for polychlorinated biphenyls (PCBs) and TPH. The Work Plan text states that analysis for volatile organic compounds (VOCs) is merited.

ACDEH requests additional analysis include the scope outlined in the SWRCBs Leaking Underground Fuel Tank (LUFT) Guidance Manual (September 2012) for waste oil tanks. If warranted, please include additional soil bore locations to adequately delineate potential contamination associated with vehicle repair activities.

5. Contaminant Source and Release Information – Soil sub element – Pangea proposes a soil bore in the hoist area, as depicted on Figure 9, and analyze soil for PCBs and TPH. Pangea indicates there is insufficient soil analytical data to evaluate for the media specific criteria for Table 1 of the SWRCBs Low Threat Underground Storage Tank Case Closure Policy (LTCP). Naphthalene is specifically identified in this sub element but is not identified as an analyte. VOC analysis is identified in the Work Plan text.

ACDEH uses the LTCP guidance for the petroleum portion of a site cleanup program (SCP) case. However, closure will be based on the San Francisco Bay Regional Water Quality Control Board (Region 2) Environmental Screening Levels (ESLs).

Please refer to Technical Comment 4 for proposing the scope of analyses for evaluating the site for potential repair facility contaminants.

6. Contaminant Source and Release Information – Groundwater sub element – Pangea discusses the COCs as the TPH and BTEX compounds identified in the Chemicals of Concern sub element (Technical Comment 4 above). This section does not address non-petroleum compounds. ACDEH requests a review of the data for non-petroleum hydrocarbon concentrations. ACDEH notes that VOC analysis is proposed in the text of the Work Plan. Based on the review, please identify if a data gap exists and discuss in the Revised Data Gap Investigation Work Plan requested below.

7. Contaminant Source and Release Information – Soil Gas sub element – Pangea proposes to install and sample two soil gas wells for volatile organic compounds (VOCs) at locations within the footprint of the proposed building. The text of the Work Plan indicates three probes will be installed, two within the foot print of the current building.

ACDEH notes that three soil gas probe locations are depicted on Figure 9. Work Plan Figure 3 and Figure 9 appear to have an overlay of the first floor of the proposed building, and the site development plan Plate A-3 - Ground Level, is provided in Appendix B. No elevator is depicted on these plans; however, the Work Plan text states soil gas well

SG-5 will be installed near the planned elevator shaft. Please clarify the number and location of the proposed soil gas probes, and depict the probe locations relative to the elevator pit on a revised figure. ACDEH does request collection of a soil vapor sample from within the elevator pit area.

8. **Soil Analysis Scope** – Pangea proposes analyzing soil samples for TPHg, TPHd, and VOCs, with select samples analyzed for TPH as motor oil (TPHmo) and PCBs. Based on the historic use of the site as an automotive repair facility, ACDEH requests soil samples be analyzed in accordance with the analysis scope for waste oil as presented in the LUFT Guidance Manual. Please identify the analysis scope in the Revised Data Gap Investigation Work Plan.
9. **Groundwater Analysis Scope** – Pangea proposes analyzing recovered grab-groundwater (GGW) samples for VOCs. ACDEH requests GGW samples be analyzed in accordance with the analysis scope for waste oil in accordance with the LUFT Guidance Manual. Please identify the analysis scope in the Revised Data Gap Investigation Work Plan.
- 10 **Soil Gas Analysis Scope** – Pangea proposes to collect and analyze soil gas samples for VOCs by EPA Method TO-15 and fixed gases including oxygen, methane, nitrogen, and carbon dioxide by ASTM Method D-1946. As isopropanol will be used as a leak check compound, please insure it is an analyte reported in the TO-15 analysis. ACDEH requests the addition of isopropanol to the analysis scope if it is not included in the TO-15 target compound list.

TECHNICAL REPORT REQUEST

Please submit technical reports to SWRCB GeoTracker site according to the following schedule. ACDEH requests notification of the GeoTracker submittals via electronic mail, Attention: Keith Nowell.

- **October 9, 2018**– Revised Data Gap Investigation Work Plan (file to be named RO182_WP_ADEND_R_YYYY-MM-DD)

If your email address does not appear on the cover page of this notification ACDEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Thank you for your cooperation. ACDEH looks forward to working with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Sincerely,

Keith Nowell, PG, CHG
Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations

cc: Bob Clark-Riddell, Pangea Environmental Services, Inc. 1710 Franklin Street, Suite 200 Oakland, CA 94612
(Sent via electronic mail to: briddell@pangeaenv.com)
Dilan Roe, ACDEH (Sent via electronic mail to: dilan.roe@acgov.org)
Paresh Khatri, ACDEH (Sent via electronic mail to: paresh.khatri@acgov.org)
Keith Nowell, ACDEH (Sent via electronic mail to: keith.nowell@acgov.org)
GeoTracker, file

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) 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 licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.