

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

COLLEEN CHAWLA, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP) FOR
HAZARDOUS MATERIALS RELEASES
1131 HARBOR BAY PARKWAY
ALAMEDA, CA 94502
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October 5, 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 *LUFT Cleanup Program Data Gap Investigation Workplan (Work Plan)*, dated July 17, 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. The Work Plan was prepared in conjunction with the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). As presented in the Work Plan, Pangea proposes to advance a total of five soil bores (designated as B-1 through B-5) for soil contamination delineation, seven bores (B-4 through B-10) for contaminant plume definition, and two soil gas probes (SG-1 and SG-2) to assess potential vapor intrusion to indoor air (VI-IA) health risks. The soil gas probes will be semi-permanent to allow for repeatable sampling.

Soil and grab-groundwater (GGW) samples will be analyzed for total petroleum hydrocarbons (TPH) as gasoline (TPHg) and TPH as diesel (TPHd) by EPA Method 8015, and benzene, toluene, ethylbenzene, and xylenes (collectively BTEX), methyl tertiary butyl ether (MTBE), and naphthalene by EPA Method 8260. Soil gas samples will be analyzed for volatile organic compounds (VOCs) by EPA Method TO-15 and fixed gases including oxygen, methane, nitrogen, and carbon dioxide by ASTM Method D-1946.

Based on ACDEH staff review of the referenced document and of the case file we generally concur with the recently proposed scope of work, provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. We request that you address the following technical comments, and perform the proposed work. Please provide 72-hour advance written notification to this office (electronic mail preferred to: keith.nowell@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. ACDEH Letter Dated September 25, 2018:

- a. **Compromised Well** - As indicated in our letter dated September 25, 2018, groundwater monitoring well STWM-1 (stet) was found to have a broken casing. The well should be assessed and if warranted, repaired or destroyed and replaced.

- b. **Well Survey** – ACDEH requests an expanded well survey to include a search of the California Department of Water Resources (DWR) and the Alameda County Public Works Agency (ACPWA) databases for nearby wells. Additionally, 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.
 - c. **Soil Gas Well Location** – Pangea proposes to install and sample two soil gas wells for volatile organic compounds (VOCs) at locations within the footprint of the proposed building. ACDEH notes that two soil gas wells are depicted on Figure 9 within the building footprint. 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. ACDEH requests collection of a soil vapor sample from within the elevator pit area.
 - d. **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.
2. **Former Dispenser Island** – Figure 9 identifies an area of approximately 20 feet by 40 feet as a former dispenser island. Two soil bores and one soil vapor probe are proposed to be advanced within this area. ACDEH notes that AEI-3, previously advanced in the vicinity of the proposed bore B-1, contained 620 micrograms per liter (ug/L) TPHg, 12 ug/L benzene, and 12 ug/L ethylbenzene. However, the proposed B-1 bore is reported to be for soil sampling only. ACDEH requests collection and analysis of a grab- groundwater (GGW) sample from bore B-1, and if warranted, the location be considered for a contingency soil vapor probe. Bore AEI-1, also collected from within the dispenser area, was reported to contain 1,300 milligrams per kilogram (mg/kg) TPHg, 4.5 mg/kg benzene and 4.6 mg/kg ethylbenzene. As no water samples have been collected from this immediate area, ACDEH requests recovery and analysis of a GGW sample from bore B-2.
 3. **Soil Sampling** – Pangea proposes to advance the soil bores to a depth of 10 feet below the ground surface (bgs) with a minimum of two soil samples collected per bore- one from 0-5 feet bgs and one from 5-10 feet bgs and that additional samples may be collected based on field observations. ACDEH requests collection of a soil sample from the vadose zone. Depth to water (dtw) varies from approximately 4 feet to 10 feet bgs. Please insure an adequate number of soil samples have been collected from each bore to assess the vertical distribution of contaminants at the site.
 4. **Contingency Well Locations** – Pangea has proposed contingency locations for one soil gas well and three groundwater monitoring wells. ACDEH would like to review the data and meet with you prior to the installation of any of these wells.

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.

- **January 4, 2019**– Soil, Groundwater and Soil Vapor Investigation Report (file to be named RO182_SWI_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.

Responsible Parties
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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, Division3, 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.