

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

REBECCA GEBHART, Acting Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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April 14, 2016

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Exchange Support Services, Inc.
180 Grand Ave., Suite 1385
Oakland, CA 94621
Attention: Lloyd Kendall Jr.

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

Subject: Request for Work Plan, 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 Environmental Health (ACEH) has evaluated the case files to determine if the site is eligible for closure as a low risk site under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on ACEH staff review, we have determined that it is unclear if the LTCP General Criteria c (The Unauthorized Release from the Underground Storage Tank- UST- System has stopped) and General Criteria f (Secondary Source Removal) has been satisfied. Additionally, the site fails to the Media-Specific Criteria for Groundwater, Vapor Intrusion to Indoor Air, and for Direct Contact.

Additional data may be available that ACEH is not aware of, or may not have been submitted, and therefore has not been incorporated in to ACEH's review. If additional data is made available, the data can be incorporated in future LTCP reviews. The evaluation of the site under the LTCP that is presented below is intended to initiate further discussions, submittal of other available documents, or the collection of additional data in order to determine if or when the site can be closed under the LTCP and to document current LTCP data gaps.

Therefore, at this juncture ACEH requests that you prepare a Data Gap Investigation Work Plan that is supported by a focused Site Conceptual Model (SCM) to address the Technical Comments provided below.

TECHNICAL COMMENTS

- 1. LTCP General Criteria c (The Unauthorized Release from the UST System has stopped) –**
According to the LTCP, the primary source is defined as the tank, pipe, or other appurtenant structure that released petroleum into the environment has been removed, repaired, or replaced. There is conflicting data in the case files related to the presence and location of the USTs, and there is no documentation pertaining the status or condition of the USTs and associated fuel dispenser piping.

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