

Nowell, Keith, Env. Health

From: Nowell, Keith, Env. Health
Sent: Tuesday, May 27, 2014 4:57 PM
To: 'charles.carmel@bp.com'
Cc: 'Kristene Tidwell'; Roe, Dilan, Env. Health
Subject: Fuel Leak Case RO190 - ARCO #2162, 15135 Hesperian Blvd., San Leandro, CA

Dear Mr. Carmel,

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the report entitled *Soil and Groundwater Investigation Report, Updated Conceptual Site Model and Request for Closure* (RFC), dated March 28, 2014, prepared by Broadbent for the subject site. ACEH acknowledges the case may be a candidate for closure in the near future under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). However, based on our review ACEH disagrees that the site meets Scenario 1 of the LTCP Media Specific Groundwater criteria as the plume length exceeds 100 feet using both the source as the underground storage tank pit or the dispenser islands. Specifically, the contaminant plume length that exceeds water quality objectives is greater than 100 feet in length, the distance from the leading edge of the plume to the nearest supply well is less than 1,000 feet, and the distance from the leading edge of the plume to the nearest supply well is less than 1,000 feet.

Although a figure showing Alameda County Public Works (ACPW) well search data was provided in Appendix J of the RFC, the requisite tabular data was not included. Therefore, ACEH reviewed the data provided by ACPW and was unable to verify the location of off-site well location #10 and the irrigation well located on Upton Avenue on Appendix J Figure 2 of the RFC.

Therefore at this juncture, ACEH requests that you review the ACPW well search data presented in the figure for plotting accuracy and re-submit the figure with the report requested below. Please establish the status of wells on Upton Avenue and Nabor Street and for the well at location #10 should it be determined the well is not a monitoring well. If any of these wells are in service, please recover a water sample from the in-service well(s). Analyze the water samples for total petroleum hydrocarbons as gasoline (TPHg), benzene, toluene, ethylbenzene, xylenes (BTEX) the fuel oxygenates methyl tertiary butyl ether (MTBE), diisopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), and tertiary butyl alcohol (TBA), and the lead scavengers 1,2-dibromroethane (aka ethylene dibromide) (EDB), and 1,2-dichloroethane (aka ethylene dichloride- EDC) (or 1,2-DCA).

Present the updated figure plotting well locations, the findings presenting the status of the wells, and results of well sampling, if any by the date specified below:

Technical Report Request

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

- **August 1, 2014– Supply Well Investigation** (file name: RO0000190_SWI_R_yyyy-mm-dd)

Thank you for your cooperation. ACEH 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.

Regards,
Keith Nowell

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PDF copies of case files can be reviewed/downloaded at:

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