



October 16, 2018

Stephen Siri
The Martin Group
Two Embarcadero Center
San Francisco, CA 94111 (Sent via e-mail to: stephen@themartingroup.com)

Subject: Technical Report Request for Fuel Leak Case No. RO0000199 and Geotracker Global ID T0600100406, Connell Oldsmobile, 3093 Broadway, Oakland, CA 94611

Dear Mr. Siri:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the following documents prepared and submitted on your behalf by Langan:

1. August 2, 2018 *Updated Petroleum Vapor Intrusion (PVI) Assessment of Current Conditions (Updated PVI)*, 3093 Broadway, Oakland, CA
2. June 28, 2018 *Results of the May 2018 Groundwater Monitoring Event*, 3093 Broadway, Oakland, CA
3. September 20, 2017 *Updated Petroleum Vapor Intrusion Assessment*
4. January 28, 2016, *Petroleum Vapor Intrusion Risk Evaluation Addendum (PVI Addendum)*
5. October 1, 2015 *Petroleum Vapor Intrusion Risk Evaluation*

TECHNICAL COMMENTS

A. Conference Call Discussion:

1. ACDEH staff e-mailed the following technical comments to your attention on October 1, 2018:
 - Modeling: PVI Risk Evaluation Addendum (September 2018) and the Updated PVI Assessment (February 2016)
 - a. Sensitivity analysis
 - b. Model inputs
 - Concentrations versus depth to water (higher concentrations observed in MW-21 when depth to water is deeper)
 - Depth to water differences (ranging from +5 feet to +8 feet) observed in MW-20, MW-21, MW-23, and MW-24
 - Groundwater Contour Maps: how they were generated; appropriateness of using all current wells to indicate groundwater gradient; are all current wells screened in the same water bearing zone (WBZ) - MW-25 and MW-13 may be screened in a deeper WBZ
 - How depth to water measurements (reported in feet below ground surface) equate to depth to bottom of the foundation.
2. Subsequently, Christina Rain and Chris Glen, Langan, submitted a draft Response to Comments (RTC) Table which was discussed during a conference call held with Dilan Roe and Karel Detterman, ACDEH, on October 4, 2018.
3. Per our discussions during the call, please revise your draft RTC Table and submit the Table prior to our scheduled October 30, 2018 conference call.

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4. As discussed during the conference call, please include the Site Utility Plan (Attachment B, BKF Figure C7) included with the August 2018 *Updated PVI* on Langan's Groundwater Elevation Figure.

B. Please conduct a Groundwater Monitoring and Sampling Event: Please conduct a dry season groundwater monitoring and sampling event using all monitoring wells and typical groundwater analyses. Please submit tables and figures summarizing results of the groundwater monitoring and sampling event with the RTC Table.

TECHNICAL REPORT REQUEST

Please revise your draft RTC Table as per our discussions during the call and submit the Table prior to our scheduled October 30, 2018 conference call.

- **October 26, 2018:** E-mailed RTC Table to karel.detterman@acgov.org

Please upload the following technical report to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule and please send an e-mail with the document to karel.detterman@acgov.org:

- **December 21, 2018:** Groundwater Monitoring and Sampling Report
File to be named: RO199_GWM_R_yyyy-mm-dd

This report is 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.

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.

Sincerely,

Karel Detterman, PG
Senior Hazardous Materials Specialist

Enclosures: Attachment 1: Responsible Party(ies) Legal Requirements/Obligations
ACDEH Electronic Report Upload (ftp) Instructions

cc: Christina Rain, Langan, (Sent via e-mail to: crain@Langan.com)
Chris Glen, Langan, (Sent via e-mail to: cglen@Langan.com)
Dilan Roe, ACDEH, (Sent via E-mail to: dilan.roe@acgov.org)
Karel Detterman, ACDEH, (Sent via E-mail to: karel.detterman@acgov.org)
Paresh Khatri, ACDEH, (Sent via E-mail to: paresh.khatri@acgov.org)
GeoTracker, eFile

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.