

## Nowell, Keith, Env. Health

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**From:** Nowell, Keith, Env. Health  
**Sent:** Friday, November 07, 2014 3:01 PM  
**To:** Louis Badetscher (louisbadetscher@gmail.com); Wannetta Hall (wannetta4414@yahoo.com)  
**Cc:** 'CharleneNeely@aol.com'; Roe, Dilan, Env. Health  
**Subject:** Fuel Leak Case RO280- Scooter Wilson, 3600 MacArthur Blvd, Oakland  
**Attachments:** RO280\_ACPWA\_WellSearch\_Plot.pdf; RO280\_ACPWA-WellSearch-2000ft\_radius\_3600MacArthurBlvd.pdf

Dear Ms. Hall and Mr. Badertscher:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the subject site (Site) and recently submitted email, dated October 31, 2014 and submitted by Ms. Charlene Neely, which provided the analytical laboratory report of a recently performed groundwater monitoring event as an attachment. The groundwater monitoring event, conducted on October 13, 2014, was requested as Bullet Point One in ACEHs directive letter dated August 15, 2014. ACEHs August 15, 2014 directive letter contains five (5) bullet points: (1) Data Trends, (2) Sensitive Receptors, (3) Preferential Pathways, (4) Primary Source Removal, and (5) Chevron Boring B-15. These item were discussed in a conference call with Mr. Badertscher and Ms. Neely on November 7, 2014.

As discussed below, it is the opinion of ACEH that Bullet Point items (1), (4) and (5) do not require additional investigation at this time as discussed below.

Item (4) Primary Source Removal - As presented in the directive letter, it is the opinion of ACEH that Bullet Point 4- Primary Source Removal, as it pertained to the potential for remnant product piping, does not require investigation at this time as the potential presence of remnant product piping does not appear to be an active primary source continuing to introduce contaminants into the environment.

However, it should be noted that this statement should not be interpreted that the Site is "clean", as remnant product piping may be present at the Site as there is no documentation in the case file that product piping has been removed, and residual contamination has been documented to remain in the subsurface as evidenced by 5,000 mg/kg total petroleum hydrocarbons as gasoline (TPHg) at seven feet below the ground surface (bgs) in sidewall sample #7 and the most elevated Site photoionization detector (PID) reading of 166 parts per million by volume (ppmv) were reported in soil boring B-1 at 2 feet bgs at the dispenser island.

Item (5) Chevron Boring B-15 - As presented in the directive letter, it is the opinion of ACEH that reported concentrations of TPHg and total petroleum hydrocarbons as diesel (TPHd) referenced in Bullet Point 5- Chevron Boring B-15 - located across MacArthur Boulevard from the Site, are not consistent with the reported on Site concentrations and are unlikely a result of the Scooter Wilson release. Hence, ACEH is of the opinion that an investigation in MacArthur Boulevard is not warranted at this time.

Item (1) Data Trends - The recent groundwater monitoring event, conducted on October 13, 2014, was performed to address the data gap identified in Bullet Point One – Data Trends- where no groundwater monitoring well samples were collected over a 4-1/2 year period between 2008 and 2013. A concentration trend analysis is not appropriate due to the lack of data between 2008 and 2013; hence, ACEH could not effectively evaluate the proposed soil gas investigation until an additional round of groundwater sampling and analysis was performed to validate the 2013 data. The additional groundwater monitoring event was conducted on October 13, 2014. Results of the investigation validated the October 25, 2013 event demonstrating residual benzene, toluene, ethylbenzene, and xylenes (BTEX) compounds are not present at concentrations warranting a soil vapor investigation.

Therefore, at this time, the only two bullet items remaining to be addressed are (2) Sensitive Receptors and (3) Preferential Pathways.

## Technical Comments

Item (2) Sensitive Receptors: Residual contamination, including TPHg, remains in the groundwater, and the plume does not appear to be defined. As requested in the August 15, 2014 directive letter, please prepare a figure using an aerial photographic base showing the sensitive receptors identified within 2,000 feet of the Site, including wells and surface water bodies. Include the rose diagram depicting historic groundwater flow direction and frequency on the figure. Wells depicted on the figure should include results from well surveys from *both* Alameda County Public Works Agency (ACPWA) and Department of Water Resources (DWR) database searches. As the DWR database search has been previously performed, ACEH requested an ACPWA well search using a 2,000-foot radius from the Site which can be used for a part of the figure. A summary table of the ACPWA wells to be plotted on the figure, including the approximate distance between the Site and the wells, is provided as an attachment. Results of the DWR well survey, located in the case file, also need to be plotted. Additionally, a copy of the ACPWA well search results is provided as an attachment.

Item (3) Preferential Pathways: In the August 15, 2014 directive letter, ACEH stated groundwater at the site has been reported as shallow as 0.91-foot below the ground surface (bgs). The variable direction of groundwater flow at the site places the catch basin located adjacent to the northeast corner of MacArthur Boulevard and Magee Avenue periodically down gradient of the former UST pit. To address the potential introduction of contaminated groundwater to the storm drain system, please determine the outfall location of the storm drain system that connects to the catch basin, identify what feature the outfall discharges into, and document the distance between the Site and the outfall. Plot the outfall location of the figure requested in Item (2) Sensitive Receptors above should the distance between the outfall and the Site be 2,000 feet or less.

Additionally, the findings of the recent groundwater monitoring event, conducted on October 13, 2014, has not been presented in a formal report. Therefore, please include the a table containing depth to water and concentrations of TPHg, TPHd, BTEX, and methyl tertiary butyl ether (MTBE), and a groundwater contour map with rose diagram for this current event. Include the laboratory analysis report as an attachment. Please note that at the date of this letter, neither the EDF, GEO\_WELL, or the GEO\_MAP data have been uploaded to GeoTracker.

## Technical Report Request

We request that you address the aforementioned technical comments, perform the proposed work, and send us the technical reports requested below. 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:

- **December 29, 2014- Sensitive Receptor and Groundwater Monitoring Report** (file name: RO0000280\_COND\_WELL\_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](mailto:keith.nowell@acgov.org).

Respectfully,  
Keith Nowell

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Attachment 1- Alameda County Public Works Agency Well Search Results

