ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
ALEX BRISCOE, Agency Director

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ENVIRONMENTAL PROTECTION
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August 31, 2012

Ms. Catalina Espino Devine
Chevron Environmental Management Co.
6101 Bollinger Canyon Road
San Ramon, CA
(sent via electronic mail to
espino@chevron.com)

Mr. Mark Hom and Anna Cheng
3135 Gibbons Drive
Alameda, CA, 94501-1749
(sent via electronic mail to
mark@galvinhom.com)

JL and Jane Bolton
Address Unknown

John Thompson
Address Unknown

Shirley & Ruben Cohen
Address Unknown

Gary & Jerri Fenstermaker
Address Unknown

Claire Cepollina & Fred Martini
Address Unknown

Subject: Request for Site Conceptual Model and Data Gap Work Plan; Fuel Leak Case No. RO0000341; (Global ID # T0600100330); Chevron #9-1153, (3126 Fernside Blvd), 3135 Gibbons Drive, Alameda, CA 94501

Dear Mses. Devine and Cheng, and Mr. Hom:

Alameda County Environmental Health Department (ACEH) staff has reviewed the case file, including the *Subsurface and Crawl Space, Indoor and Ambient Air Investigation Report,* dated April 18, 2012 and the *Second Quarter 2012 Groundwater Monitoring and Sampling Report*, dated July 26, 2012. Both reports were prepared and submitted by Conestoga-Rovers & Associates (CRA) on your behalf. Thank you for submitting the reports. The subsurface report documented the results of the installation of eight soil bores (B-1 to B-8) and the collection of soil samples, and the collection of vapor samples (ambient background, indoor air, and crawl space; for TPHg, BTEX, MTBE, naphthalene, and aliphatic hydrocarbons) in an attempt to understand the potential vapor contribution from subsurface sources beneath the subject site. Background and crawl space vapor concentrations were very similar, reporting benzene concentrations over ESLs for ambient and residential indoor air; however, both crawl space samples reported slightly higher concentrations (except MTBE). Both indoor air samples contained substantially higher concentrations of one or more compounds above outdoor or crawl space air samples. While a building chemical survey was conducted, it does not appear chemical products were removed from the house prior to collection of the indoor air vapor samples in an attempt to determine the contribution from onsite subsurface contamination.

Based on the review of the case file ACEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

1. **Proposed Surfactant Enhanced Recovery Corrective Actions -** The referenced investigation report also contained a modified work plan largely based on a previous work plan (January 14, 2010 *Work Plan for Remediation and Vapor Survey),* that recommended surfactant enhanced recovery (SER) with a surfactant injection pilot test at free-phase well C-1. The recent work plan proposed the installation of two wells approximately 15 to 20 feet down and cross gradient (respectively) to monitor for the presence of surfactant in groundwater radially from the proposed

injection point at well C-1. Review of groundwater gradient maps and associated rose diagrams indicate that both proposed well locations are not appropriately positioned (are not downgradient of well C-1) to properly monitor or capture liberated soil free-phase hydrocarbons at the site unless the wells become extraction wells to manage (and confine) groundwater flow to the site. Critically, one of the principal rationales for the proposed SER is vicinity and property owner complaints related to remediation system noise. Otherwise, because free-phase well C-1 is essentially at the property line limits of the parcel, downgradient migration of free-phase cannot be precluded or controlled between individual short duration extraction events without an active system. Further the reported limited ability to locate bores or wells due to property owner preferences and exclusions, also indicates that the location of additional groundwater control wells (or bores) is also likely to be difficult to identify and limited. Thus while only well C-1 contains free-phase, existing data (confirmed and augmented by data collected in the recent site investigation), continues to indicate significant hydrocarbon contamination remains, at a minimum, in the majority of the southeastern half of the site; including significant concentrations at a depth of three feet, three to four feet from the foundation of a residential home (and is therefore presumed to also under lie the home due to likely source areas). ACEH also remains sufficiently concerned that the C-1 well pilot test might thus become essentially a spot treatment of a free-phase well without an apparent ability to also remediate elevated residual soil contamination across the site including in close proximity to the residential living spaces. As such SER appears to be an inappropriate remedial technology without the installation of a method to capture, manage, and collect liberated free-phase, and to monitor and remediate soil beneath the site, and ACEH does not concur with this approach.

2. **Request for SCM and Data Gap Work Plan –** ACEH requests the generation of an site conceptual model (SCM) to identify data gaps at the subject site, accompanied with a data gap work plan. One of several data gaps noted by ACEH includes an onsite well downgradient (east) of well C-1. It is understood that wells MW-8, MW-9, and MW-10 are downgradient and are non-detectable for hydrocarbon compounds found at the subject site; however, well placement limitations imposed by the five-star intersection (of three roads) and the presence of a major utility corridor along High Street, with multiple utilities located in the groundwater bearing zone, suggests a strong potential for direct migration to the Oakland – Alameda Estuary. While it is understood that the utilities may have used native soils as backfill, and that this is typically suggested not to create preferential pathways, ACEH also has direct experience with similar Alameda backfills acting as preferential pathways. A well positioned closer would serve multiple purposes onsite.

   The SCM will help synthesize all the analytical data and evaluate all potential exposure pathways and potential receptors that may exist at the site, including identifying or developing site cleanup objectives and goals. At a minimum, the SCM should include:

   - Local and regional plan view maps that illustrate the location of sources (former facilities, piping, tanks, etc.) extent of contamination, direction and rate of groundwater flow, potential preferential pathways, and locations of receptors;
   - Geologic cross section maps that illustrate subsurface features, man-made conduits, and lateral and vertical extent of contamination;
   - Plots of chemical concentrations versus time;
   - Plots of chemical concentrations versus distance from the source;
   - Summary tables of chemical concentrations in different media (i.e. soil, groundwater, and soil vapor); and
   - Well logs, boring logs, and well survey maps;
   - Discussion of likely contaminant fate and transport.

   For data gaps (i.e. potential contaminant volatilization to indoor air or contaminant migration along preferential pathways, etc.) identified in the SCM please include a data gap work plan, by the

date specified below. A sample SCM and Data Gap Table has been attached to this letter and may be an appropriate format for this site.

3. **Crawl Space, Indoor, and Ambient Air Analytical Results –** As noted above both ambient air and crawl space samples reported very similar concentrations, with slightly higher concentrations of most analytes (TPHg and BTEX) in the crawl space vapor samples; while significantly higher indoor air concentrations for the same analytes were reported. The subsequent analysis suggested that the indoor air samples were within a typical range for indoor air and cited data from six studies as support (Table D of the report, and derived in part from the November 2002 *Draft Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway form Groundwater and Soils [Subsurface Vapor Intrusion Guidance]* and the 2005 DTSC guidance document). ACEH has several technical concerns in regards with the analysis:

    a. **Age of Cited Source Studies –** The majority of the references cited predate the 1996 gasoline reformulation at the Federal level. One of the goals of gasoline reformulation was the reduction of benzene concentrations by approximately 50% by that date. Further reductions in benzene concentrations have followed, especially in California, with the required addition of MTBE in the late 1990's and the associated removal of benzene at that time (with subsequent further modifications in 2003 with the required removal of MTBE). The concentrations of benzene in the cited studies would be expected to reflect higher benzene source concentrations (including gasoline). These higher concentrations would also be expected to affect the background concentration of benzene inside or around (outside) homes at the time of the study. Consequently, it would appear inappropriate to compare older studies, which are likely to generate higher background benzene concentrations, to current generation gasoline formulations or analytical results.

    b. **Indoor Air Vapor Source Accounting –** As reported, the indoor air vapor concentrations were significantly higher than crawl space or ambient outdoor air concentrations and largely attributed higher indoor air concentrations to proximity of the garage and automotive gasoline use, and the laundry room which contained several consumer cleaning products, but which did not have a clear associated chemical content connection. Despite the generation of a chemical product inventory, the report did not otherwise seek to specifically identify other potential sources that would account for the significantly elevated indoor air concentrations.

    As a consequence of these concerns, ACEH requests further analysis of the analytical results of the vapor survey in the SCM, and inclusion of any associated data gaps in the data gap work plan requested above. One such data gap solution identified by ACEH may be the collection of sub-slab vapor samples from beneath the garage slab floor.

4. **Groundwater Monitoring of Recovery Well –** Recovery well RW-1 does not appear to have been monitored in recent history; however, appears to be extant. ACEH requests that it be incorporated into the current monitoring schedule, after it has been redeveloped. Please include redevelopment field sheets for the well in the next groundwater monitoring report, and past analytical data in all future groundwater monitoring reports, by the dates identified below.

5. **Groundwater Monitoring Schedule –** Except for well C-1, wells at the site are sampled on a semi-annual or annual basis; well C-1 is monitored on a quarterly basis. Review of the analytical data collected from downgradient well MW-10 (non-detectable for all compounds for over 11 years) indicates that sufficient and very consistent data indicates that well MW-10 should also be monitored on an annual sampling basis. Free-phase well C-1 should continue to be monitored on a quarterly (or more frequent) basis; however, ACEH requests that the data be reported on a semi-annual basis, as defined below.

6. **Request for an Updated Site Plan –** The current site plan does not appear to reflect site features as visible on aerial photograph map searches. As a consequence ACEH requests that an updated site plan be generated for future reports.

TECHNICAL REPORT REQUEST

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

- **October 19, 2012 –** SCM and Data Gap Work Plan
  File to be named: SCM_WP_R_yyyy-mm-dd
- **November 30, 2012 –** Second Semi-Annual 2012 Groundwater Monitoring Report
  File to be named: GWM_R_yyyy-mm-dd
- **May 24, 2013 –** First Semi-Annual 2013 Groundwater Monitoring
  File to be named: GWM_R_yyyy-mm-dd
- **60 Days After SCM & Data Gap Work Plan Approval –** Soil & Groundwater Investigation
  File to be named: SWI_R_yyyy-mm-dd
- **90 Days After SWI Approval –** Feasibility Study
  File to be named: FEASSTUD_R_yyyy-mm-dd

These reports are 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.

Online case files are available for review at the following website: http://www.acgov.org/aceh/index.htm.

If you have any questions, please call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Digitally signed by Mark E. Detterman
DN: cn=Mark E. Detterman, o, ou, email, c=US
Date: 2012.08.31 10:27:55 -07'00'

Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

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

cc: Nathan Lee, Conestoga-Rovers & Assoc., 5900 Hollis Street, Suite A, Emeryville, CA 94608
(sent via electronic mail to nlee@craworld.com)

Donna Drogos, (sent via electronic mail to donna.drogos@acgov.org)
Mark Detterman (sent via electronic mail to mark.detterman@acgov.org)
Electronic File, GeoTracker

Attachment 1

Responsible Party(ies) Legal Requirements/Obligations

REPORT/DATA REQUESTS

These reports/data are being requested pursuant to Division 7 of the California Water Code (Water Quality), Chapter 6.7 of Division 20 of the California Health and Safety Code (Underground Storage of Hazardous Substances), and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations (Underground Storage Tank Regulations).

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (Local Oversight Program [LOP] for unauthorized releases from petroleum Underground Storage Tanks [USTs], and Site Cleanup Program [SCP] for unauthorized releases of non-petroleum hazardous substances) require submission of reports in electronic format pursuant to Chapter 3 of Division 7, Sections 13195 and 13197.5 of the California Water Code, and Chapter 30, Articles 1 and 2, Sections 3890 to 3895 of Division 3 of Title 23 of the California Code of Regulations (23 CCR). Instructions for submission of electronic documents to the ACEH FTP site are provided on the attached "Electronic Report Upload Instructions."

Submission of reports to the ACEH FTP site is in addition to requirements for electronic submittal of information (ESI) to the State Water Resources Control Board's (SWRCB) Geotracker website. In April 2001, the SWRCB adopted 23 CCR, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1 (Electronic Submission of Laboratory Data for UST Reports). Article 12 required electronic submittal of analytical laboratory data submitted in a report to a regulatory agency (effective September 1, 2001), and surveyed locations (latitude, longitude and elevation) of groundwater monitoring wells (effective January 1, 2002) in Electronic Deliverable Format (EDF) to Geotracker. Article 12 was subsequently repealed in 2004 and replaced with Article 30 (Electronic Submittal of Information) which expanded the ESI requirements to include electronic submittal of any report or data required by a regulatory agency from a cleanup site. The expanded ESI submittal requirements for petroleum UST sites subject to the requirements of 23 CCR, Division, 3, Chapter 16, Article 11, became effective December 16, 2004. All other electronic submittals required pursuant to Chapter 30 became effective January 1, 2005. Please visit the SWRCB website for more information on these requirements. (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 7835, and 7835.1) 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 registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, late reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional 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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	**REVISION DATE:** July 25, 2012
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	**SUBJECT:** Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (petroleum UST and SCP) require submission of all reports in electronic form to the county's FTP site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single Portable Document Format (PDF) with no password protection**.
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- **Signature pages and perjury statements must be included and have either original or electronic signature.**
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted**.
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

  RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Submission Instructions

1) Obtain User Name and Password
   a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
      i) Send an e-mail to deh.loptoxic@acgov.org
   b) In the subject line of your request, be sure to include **"ftp PASSWORD REQUEST"** and in the body of your request, include the **Contact Information, Site Addresses**, and the **Case Numbers (RO# available in Geotracker) you will be posting for**.

2) Upload Files to the ftp Site
   a) Using Internet Explorer (IE4+), go to ftp://alcoftp1.acgov.org
      (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
   b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
   c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
   d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
   e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.

3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
   a) Send email to deh.loptoxic@acgov.org notify us that you have placed a report on our ftp site.
   b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
   c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
   d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.

TABLE 1

INITIAL SITE CONCEPTUAL MODEL
Crown Chevrolet
7544 Dublin Boulevard
Dublin, California

CSM Element	CSM Sub-Element	Description	Data Gap	How to Address
Geology and Hydrogeology	Regional	The site is in the northwest portion of the Livermore Valley, which consists of a structural trough within the Diablo Range and contains the Livermore Valley Groundwater Basin (referred to as "the Basin") (DWR, 2006). Several faults traverse the Basin, which act as barriers to groundwater flow, as evidenced by large differences in water levels between the upgradient and downgradient sides of these faults (DWR, 2006). The Basin is divided into 12 groundwater basins, which are defined by faults and non-water-bearing geologic units (DWR, 1974). The hydrogeology of the Basin consists of a thick sequence of fresh-water-bearing continental deposits from alluvial fans, outwash plains, and lacustrine environments to up to approximately 5,000 feet bgs (DWR, 2006). Three defined fresh-water bearing geologic units exist within the Basin: Holocene Valley Fill (up to approximately 400 feet bgs in the central portion of the Basin), the Plio-Pleistocene Livermore Formation (generally between approximately 400 and 4,000 feet bgs in the central portion of the Basin), and the Pliocene Tassajara Formation (generally between approximately 250 and 5,000 or more feet bgs) (DWR, 1974). The Valley Fill units in the western portion of the Basin are capped by up to 40 feet of clay (DWR, 2006).	None	NA
	Site	***Geology:*** Borings advanced at the site indicate that subsurface materials consist primarily of finer-grained deposits (clay, sandy clay, silt and sandy silt) with interbedded sand lenses to 20 feet below ground surface (bgs), the approximate depth to which these borings were advanced. The documented lithology for one on-site boring that was logged to approximately 45 feet bgs indicates that beyond approximately 20 feet bgs, fine-grained soils are present to approximately 45 feet bgs. A cone penetrometer technology test indicated the presence of sandier lenses from approximately 45 to 58 feet bgs and even coarser materials (interbedded with finer-grained materials) from approximately 58 feet to 75 feet bgs, the total depth drilled. The lithology documented at the site is similar to that reported at other nearby sites, specifically the Montgomery Ward site (7575 Dublin Boulevard), the Quest laboratory site (6511 Golden Gate Drive), the Shell-branded Service Station site (11989 Dublin Boulevard), and the Chevron site (7007 San Ramon Road). ***Hydrogeology:*** Shallow groundwater has been encountered at depths of approximately 9 to 15 feet bgs. The hydraulic gradient and groundwater flow direction have not been specifically evaluated at the site.	As noted, most borings at the site have been advanced to approximately 20 feet bgs, and one boring has been advanced and logged to 45 feet bgs; CPT data was collected to 75 feet bgs at one location. Lithologic data will be obtained from additional borings that will be advanced on site to further the understanding of the subsurface, especially with respect to deeper lithology. The on-site shallow groundwater horizontal gradient has not been confirmed. Additionally, it is not known if there may be a vertical component to the hydraulic gradient.	Two direct push borings and four multi-port wells will be advanced to depth (up to approximately 75 feet bgs) and soil lithology will be logged. See items 4 and 5 on Table 2. Shallow and deeper groundwater monitoring wells will be installed to provide information on lateral and vertical gradients. See Items 2 and 5 on Table 2.
Surface Water Bodies		The closest surface water bodies are culverted creeks. Martin Canyon Creek flows from a gully west of the site, enters a culvert north of the site, and then bends to the south, passing approximately 1,000 feet east of the site before flowing into the Alamo Canal. Dublin Creek flows from a gully west of the site, enters a culvert approximately 750 feet south of the site, and then joins Martin Canyon Creek approximately 750 feet southeast of the site.	None	NA
Nearby Wells		The State Water Resources Control Board's GeoTracker GAMA website includes information regarding the approximate locations of water supply wells in California. In the vicinity of the site, the closest water supply wells presented on this website are depicted approximately 2 miles southeast of the site; the locations shown are approximate (within 1 mile of actual location for California Department of Public Health supply wells and 0.5 mile for other supply wells). No water-producing wells were identified within 1/4 mile of the site in the well survey conducted for the Quest Laboratory site (6511 Golden Gate Drive; documented in 2009); information documented in a 2005 report for the Chevron site at 7007 San Ramon Road indicates that a water-producing well may exist within 1/2 mile of the site.	A formal well survey is needed to identify water-producing, monitoring, cathodic protection, and dewatering wells.	Obtain data regarding nearby, permitted wells from the California Department of Water Resources and Zone 7 Water Agency (Item 11 on Table 2).

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Constituents of Concern		Constituents of concern have been identified by comparing analytical results to environmental screening levels for residential land use and for groundwater that is a current or potential drinking water source, developed by the California Regional Water Quality Control Board, San Francisco Bay Region (May 2008). PCE and TCE have been identified as the primary constituents of concern at the site; these constituents have been detected in soil, groundwater and soil vapor in the northern portion of the site. Biodegradation byproducts (e.g., cis-1,2-DCE) are present in groundwater, but at lower concentrations relative to PCE and TCE and below their respective environmental screening levels. Vinyl chloride has been detected in soil vapor at concentrations above its screening level. In the northern portion of the site, benzene and ethylbenzene have been detected in soil vapor at concentrations above their respective screening levels. Chlorobenzene and related constituents, and to a lesser extent, benzene, are present in soil, groundwater, and soil vapor at the former sump and pit in Building B.	None	NA
Potential Sources	On-site	Building B has been used for servicing automobiles since the 1960s. Based on the minor detections of PCE in soil vapor (in an area where groundwater is not impacted) beneath Building B and in groundwater beneath the former sump in another portion of Building B, it is possible that PCE entered the drain line from the sump within Building B, and was released to the subsurface from the sewer line northeast of Building A between 1968 and the present. There is no likely source in Building A, which has only been used as a showroom. Investigation performed within and downgradient of Building C indicates that there are no significant impacts in this area.	Concentrations of PCE in groundwater and soil vapor are highest approximately 50 feet west of the sewer line; the mechanism for these constituents to be present west of the sewer line is not currently known.	A subsurface utility locator, using ground penetrating radar, will evaluate the area north of Building A to ascertain the possible presence of unknown, buried utilities that could serve as a PCE source or migration conduit in the area. See Item 10 on Table 2.
		Two USTs (one 1,000-gallon gasoline and one 1,000-gallon waste oil) are present just south of Building B). The tanks appear to have been replaced in the 1980s and upgraded in 1998. Recent data collected in the vicinity of the USTs indicate that there are no significant impacts.	The absence of localized impacts to soil in the vicinity of the USTs has not been confirmed.	No additional investigation is recommended at this time. Additional sampling may be conducted as part of the formal UST closure process, and any impacts addressed at that time.
Potential Sources	Off-site	The site is located within a commercial/industrial area, and several vehicle-maintenance related shops are located south of the site; these facilities appear to be served by a sewer that flows north along the western edge of the Crown site. It is possible that PCE was released to the subsurface upgradient of the site via the sewer line. Additionally, there are three dry cleaners located hydraulically upgradient of the Crown site, including Crow Canyon Cleaners at 7272 San Ramon Road, which has a known groundwater contamination issue (however, that site is approximately 0.5 mile from the Crown site and groundwater at the site has limited impact with maximum concentrations of 24 parts per billion). The other two sites, VIP Cleaners at 7214 Regional Street and “Dry Clean 1 Hour” at 7257 Regional Street, are slightly closer to the Crown site (0.3 mile) and may have had an undocumented release to soil or groundwater. All three of the sites are served by sewers that flow north, away from the Crown site, but sewer releases in the general area, if any, could have impacted groundwater flowing toward the Crown site.	A specific off-site source is not known at this time. It is possible that additional research and/or investigation will be warranted at a later time, pending the results of this investigation.	NA

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Potential Presence of DNAPL		Based on the currently available information, there does not appear to be separate-phase product (i.e., DNAPL) in soil or groundwater at the site. The U.S. EPA Fact Sheet entitled "Estimating Potential for Occurrence of DNAPL at Superfund Sites" (Fact Sheet) includes two flow charts that provide guidance for assessing whether site characterization data indicate the presence of DNAPL. The EPA approach uses lines of evidence that include consideration of historical site use and site characterization data. Based on the historical site use flow chart, some activities may have been performed (i.e., metal cleaning/degreasing and paint removing/stripping) that possibly may have resulted in historical DNAPL releases. However, review of available historical site chemical inventories does not indicate the presence of pure product PCE; it was likely present within other products at lower concentrations (percentage of product mixtures). Laboratory data generated from site characterization activities conducted to date do not indicate the potential for DNAPL, based on the following conditions, which are components of the laboratory data flow chart in the Fact Sheet: • Concentrations of PCE in groundwater are not greater than 1% of the solubility of PCE (i.e., greater than 2,000 µg/L, which is 1% of the pure product solubility of PCE)[1]; • Concentrations of PCE on soils are not greater than 10,000 mg/kg (and PID readings collected every 1 to 3 feet in the area of elevated groundwater concentrations were all 0, with the exception of several readings at 0.1 parts per million); and • Concentrations of PCE in groundwater calculated from water/soil partitioning relationships and soil samples are not greater than 1,500 µg/L.	Some elements listed in the Fact Sheet that would further our understanding of whether DNAPL is present at the site include additional knowledge of site stratigraphy and vertical distribution of PCE.	Four multi-port wells will be advanced to depth (up to approximately 75 feet bgs) and soil lithology will be logged. See items 4 and 5 on Table 2.
Nature and Extent of Environmental Impacts	Extent in Soil	PCE and TCE have been detected in soil samples collected north of Buildings A and B. All concentrations are less than their respective screening levels for residential shallow soil, applicable to groundwater considered to be a potential source of drinking water (screening levels of 370 and 460 µg/kg for PCE and TCE, respectively). PCE was detected at concentrations up to 6.8 µg/kg in soil at a depth of approximately 5.5 feet bgs in the vicinity of the highest PCE concentrations in groundwater and soil vapor (locations NM-B-32 and SV-22, respectively). It is likely that these PCE detections represent PCE in the vapor phase and not a source of PCE in soil. PCE and TCE were detected in deeper soil samples (between 12.5 and 14.5 feet bgs) at concentrations up to 36 µg/kg (in borings NM-B-23B, -24, -25, -26, 29, and -30). These soil samples were generally located within the saturated zone and it is likely that the detected concentrations represent PCE and TCE in groundwater. Soil was screened during advancement of the direct-push probe approximately every 1 to 4 feet using a PID; readings in most borings were 0 ppm; the highest PID readings (up to 22 ppmv of total VOCs) were observed at SB-02 within a likely saturated zone.	Additional samples will be collected to confirm absence of significant VOC concentrations in soil.	Soil samples will be collected from select borings, as indicated on Table 2 (Items 1, 3, and 8); sampling locations are prescribed and/or will be collected based on field observations.
		Chlorobenzenes and petroleum-related constituents were detected in soil in the vicinity of the former sump and pit at concentrations greater than their respective ESLs; soil remediation was performed in 2011. Currently inaccessible impacted soil remains in place under existing building foundation walls at concentrations greater than ESLs.	Soil samples have collected to a total depth of 11.5 feet bgs pre-remediation and 8 feet bgs post-remediation beneath the sump. The remediation consisted of soil excavation to a depth of 16 feet bgs. No soil samples were collected at the base of the excavation because the soil was saturated; there is currently no data confirming the absence of significant impacts to soil beneath the sump.	No additional investigation is recommended at this time. Additional soil removal and sampling may be conducted at the time of redevelopment.

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Dublin, California

CSM Element	CSM Sub-Element	Description	Data Gap	How to Address
Nature and Extent of Environmental Impacts	Extent in Soil	TPHho (at concentrations greater than the residential ESL) was detected in soil sample SB-20-11 near a hydraulic lift east of the former pit in Building B (an elevated concentration of TPHho also was detected in soil sample SB-25-8; this sample location subsequently was excavated). Analysis for PCBs was performed on 13 samples, which were collected in the vicinity of hydraulic lifts within Building B. One PCB, Arochlor 1242, was detected in a soil sample collected at location NM-B-5 just north of the pit in Building B; however, the concentration of Aroclor 1242 at this location was an order of magnitude lower than its screening level. No other PCBs were detected in soil samples (however, the detection limit for Aroclor in 1 sample of the 13 samples analyzed was above the screening level).	None	NA
Nature and Extent of Environmental Impacts	Extent in Shallow Groundwater	Grab groundwater data are available for VOCs on approximately 50- to 100-foot centers throughout the northern portion of the site, indicating that PCE, TCE, and some related breakdown products (other VOCs) are present in groundwater at concentrations greater than their respective screening levels that consider groundwater to be a current or potential drinking water resource (the screening level is 5 µg/L for both PCE and TCE). The current data indicate that the highest concentrations of PCE in groundwater are limited to a small area just north of Building A, adjacent to and near a sewer line (concentrations in this area range from 120 to 190 µg/L at locations NM-B-23B2 and NM-B-32, respectively; these concentrations are not indicative of separate-phase product in groundwater). PCE also was detected at concentrations less than 50 µg/L upgradient (to the north and west) and downgradient (to the east) of the highest concentration area. TCE is present at higher concentrations relative to PCE at sampling locations NM-B-26-W and NM-B-28-W, in the northeast corner of the site; cis- and trans-1,2-DCE also were detected in these groundwater samples (at concentrations below their respective screening levels). Cis- and trans-1,2-DCE also have been detected (below screening levels) at other groundwater sampling locations. The results suggest that natural biodegradation could be occurring. With the exception of one shallow grab groundwater sample (Basics sample B8 located at the former sump) in which PCE was detected at 9.6 µg/L, only low concentrations of PCE (less than 5 µg/L) were detected in shallow groundwater in the vicinity of the former sump and pit.	Groundwater concentrations are not defined to less than the ESL in the following areas: • The northern and western property boundaries. • The eastern property boundary and the adjacent property to the east. • Within Building A, south of the highest concentration area. No temporal data are available. Specific data to confirm that natural biodegradation processes may be occurring has not been collected.	Seven monitoring wells will be installed to collect groundwater samples for evaluation of current and long-term concentration trends. See items 1, 2, 3, 5, 4, 7, and 8 in Table 2. Groundwater samples will be analyzed for field parameters that could indicate that natural biodegradation is occurring. See Item 2 in Table 2.
		Chlorobenzenes and petroleum-related constituents are present in shallow groundwater at concentrations greater than ESLs in the vicinity of the former sump within Building B (where soil remediation was conducted in 2011). The presence of these constituents (e.g., gasoline-range organics, benzene, and chlorobenzene) in groundwater appears to be limited to an area within approximately 15 feet of the former sump. These constituents were not detected above ESLs in groundwater samples collected at the former pit in Building B.	No temporal data are available.	One shallow groundwater monitoring well will be installed within the area of known impacts. See Item 2 on Table 2.
Nature and Extent of Environmental Impacts	Extent in Shallow Groundwater	TPHho (at a concentration greater than its screening level) was detected in an unfiltered groundwater sample (SB-20) collected near one hydraulic lift east of the former pit in Building B; however, no TPHho was detected in the filtered groundwater sample. The unfiltered sample result is likely representative of TPHho sorbed onto soil particles, as TPHho was also detected in soil at 11 feet bgs at this location. The reporting limits for TPHho (and TPHd and TPHmo) in groundwater are greater than the respective screening levels for these constituents. However, no TPH was detected down to the laboratory's method detection limit for the filtered samples. While concentrations less than the laboratory reporting limit are estimated, the absence of detections indicates that dissolved TPHd, TPHmo, and TPHho are not present.	None	NA
		Total chromium was detected above the residential ESL at one location (SB-06), but dissolved concentrations in the vicinity were less than the screening level.	None	NA

TABLE 1

INITIAL SITE CONCEPTUAL MODEL
Crown Chevrolet
7544 Dublin Boulevard
Dublin, California

CSM Element	CSM Sub-Element	Description	Data Gap	How to Address
Nature and Extent of Environmental Impacts	Extent in Deeper Groundwater	Grab groundwater samples have been collected from two deeper water-bearing zones. Samples were collected from approximately 42 to 47 feet bgs and from 58 to 63 feet bgs from a boring just downgradient of the former sump within building B, and from approximately 43.5 feet bgs from a boring adjacent to the sewer line (northeast of Building A, just east of the highest concentration area). No constituents were detected in the deeper groundwater samples.	Limited data are available within the area of known PCE impacts to shallow groundwater, and no temporal data are available.	Nested, multi-port groundwater monitoring wells will be installed at four locations. Ports will be located within the shallowest water-bearing zone, in addition to one to two deeper water bearing zones (as possible based on saturated units encountered). See Item 5 of Table 2.
Nature and Extent of Environmental Impacts	Extent in Soil Vapor	PCE, TCE, vinyl chloride, and some related breakdown products, were detected in soil vapor in the northern portion of the north parcel; PCE, TCE, and vinyl chloride concentrations are greater than residential screening levels for evaluation of potential vapor intrusion concerns (410, 1,200, and 31 µg/m^3, respectively [Table E-2 of the May 2008 Water Board publication]) in some areas. The highest concentrations of PCE detected in soil vapor (up to a maximum concentration of 35,000 µg/m^3 at location SV-22) were in the vicinity of the highest concentrations of PCE in groundwater (north of Building A, near the sewer line). PCE has been detected in soil vapor at concentrations greater than the ESL (up to 9,600 µg/m^3 at location SV-24) at various locations north of Buildings A and B, along the sewer line running from between Buildings A and B to Dublin Boulevard, and along the floor drain lateral to the sewer line within Building B. (It should be noted that PCE was detected at 4,700 µg/m^3 in sample SV-3, collected from within a former pit in Building B; this pit has since been removed). The higher concentrations of TCE in soil vapor also generally correlate with the higher concentrations of TCE in groundwater. The concentration of vinyl chloride in soil vapor exceeded its screening level in three samples collected in the north-central area of the north parcel (SG-03, SG-04, and SV-23).	Only limited soil vapor data is available at the eastern property boundary.	A transect of four nested temporary soil vapor probes will be installed at the eastern property boundary. Based on results of initial sampling, at least two of these probes will be converted to permanent vapor monitoring probes. See Item 6 on Table 2.
		PCE was detected in one vapor sample, at a concentration that is approximately an order of magnitude less than its screening level, at the northwestern corner of the southern parcel. No auto servicing activities are known to have been conducted in this area, which was historically used as a parking lot. PCE was not detected in groundwater at this location.	The source and extent of PCE in soil vapor is not known.	Four temporary soil vapor probes will be installed and sampled in the southern parcel around the location of the PCE detection. See Item 9 on Table 2.
Nature and Extent of Environmental Impacts	Extent in Soil Vapor	Benzene and ethylbenzene have been detected in shallow soil vapor (i.e., collected from 1.5 to 5 feet bgs) north of Buildings A and B at concentrations exceeding their respective screening levels. Benzene was detected at concentrations generally ranging from 90 to 160 µg/m^3, with one detected concentration of 1,300 µg/m^3 (the shallowest soil vapor sample, which was collected from a depth of 1.5 to 2 feet bgs at location SV-16) in the northeastern portion of the north parcel. Ethylbenzene concentrations were greater than the screening level at two locations, up to a maximum concentration of 1,300 µg/m^3 at location SV-16. These constituents were not detected in corresponding soil and groundwater samples, and there was not a visible pattern to the soil vapor sample concentrations. Additionally, there is no known source of petroleum-related constituents in the northern portion of the north parcel.	The extent of benzene and ethylbenzene at concentrations greater than screening levels has not been defined. While shallow soil will be removed during the proposed redevelopment, and engineering controls are expected to be implemented in this area due to PCE concentrations in soil vapor, only limited soil vapor data is available at the eastern property boundary.	A transect of four nested temporary soil vapor probes will be installed at the eastern property boundary. Based on results of initial sampling, at least two of these probes will be converted to permanent vapor monitoring probes. See Item 6 on Table 2.
		Soil vapor sampling was conducted in the vicinity of the former sump and pit in Building B prior to remediation, and some concentrations of PCE, benzene, 1,2-dichlorobenzene, and 1,4-dichlorobenzene were greater than their respective screening levels at that time.	Post-remediation soil vapor concentrations are not known.	No additional investigation is recommended at this time. Additional sampling may be conducted at the time of redevelopment.
Migration Pathways	Potential Conduits	Figure 2 shows the known locations of on-site utilities, including sanitary sewer laterals, water, gas, and electrical lines. These facilities could act as conduits for vapor migration. From the data collected at the site, it appears that concentrations of VOCs in soil vapor generally correlate with concentrations of VOCs in groundwater. Based on this observation, it appears that these utilities act as only a minor conduit, if at all.	While we believe that PCE was released to the subsurface via the main on-site sewer line and lateral from Building B, the highest concentrations of PCE in soil vapor and groundwater are west (in the presumed upgradient direction) of the on-site sewer main. The extent of possible subsurface utilities just north of Building A, which may have acted as a source for a PCE release, is not known.	A subsurface utility locator will evaluate the area, including with ground-penetrating radar, to evaluate if there are potential conduits in the area. See Item 10 on Table 2.

TABLE 1

INITIAL SITE CONCEPTUAL MODEL
Crown Chevrolet
7544 Dublin Boulevard
Dublin, California

CSM Element	CSM Sub-Element	Description	Data Gap	How to Address
Potential Receptors/Risk	On-site	Potable water at the site currently is provided via municipal supply and will continue to be in the foreseeable future. As such, direct contact to groundwater is not contemplated. Receptors at the site could include the following: • Current worker via vapor intrusion to indoor air • Future construction worker via soil, groundwater, and soil vapor • Future resident via vapor intrusion to indoor air • Future maintenance worker via soil and soil vapor	Potential impacts to on-site receptors are not known.	Human health risks will be evaluated following additional data collection.
Potential Receptors/Risk	Off-site	Potential off-site receptors include: • Nearby water-producing wells, if any are present • Concrete-lined Dublin Creek and Martin Canyon Creek	Potential impacts to off-site receptors are not known.	Data will be obtained from the California Department of Water Resources and Zone 7 Water Agency regarding the location of nearby water-producing wells, including the depth at which groundwater is extracted, will be obtained. See Item 11 on Table 2. The potential for constituents at the site to impact off-site receptors will be evaluated pending the results of the proposed investigation.

Abbreviations
bgs = below ground surface
cis-1,2-DCE = cis-1,2-dichloroethene
trans-1,2-DCE = trans-1,2-dichloroethene
DNAPL = dense non-aqueous phase liquid
mg/kg = milligrams per kilogram
PCE = tetrachloroethene
PCBs = polychlorinated biphenyls
PID = photoionization detector
ppm = parts per million
ppmv = parts per million by volume
TCE = trichloroethene
TPHho = total petroleum hydrocarbons as hydraulic oil
TPHd = total petroleum hydrocarbons as diesel
TPHmo = total petroleum hydrocarbons as motor oil
µg/kg = micrograms per kilogram
µg/L = micrograms per liter
$\mu g/m^3$ = micrograms per cubic meter

Note
1. Pankow, J., et al, 1996, Dense chlorinated solvents in groundwater: background and history of the problem: in Pankow D. and Cherry J. (eds.), Dense Chlorinated Solvents and other DNAPLs in Groundwater, Waterloo Press, Portland, Ore., Ch. 1, pp. 1-52.

TABLE 2

DATA GAPS AND PROPOSED INVESTIGATION
Crown Chevrolet
7544 Dublin Boulevard
Dublin, California

Item	Data Gap	Proposed Investigation	Rationale	Analysis
1	Refine groundwater contours beneath Building A. Collect data relevant to the potential for biodegradation.	Advance two borings to approximately 20 feet bgs within Building A for collection of soil and grab groundwater samples.[1] Soil samples will be collected at two depths in the vadose zone. Soil samples will be collected based on field indications of impacts (PID readings, odor, staining) or, in the absence of field indications of impacts, at 5 and 10 feet bgs.	The highest concentrations of PCE in groundwater were detected at boring NM-B-32, just north of Building A. One boring will be advanced approximately 15 feet from the northern building wall to provide data close to the highest concentration area. A second boring will be advanced approximately halfway between the first boring and existing boring NM-B-31 to provide additional spatial data for contouring purposes. These borings will be part of a transect in the highest concentration area.	*Groundwater:* VOCs by EPA Method 8260, dissolved oxygen, oxidation/reduction potential, temperature, pH, and specific conductance. *Soil:* VOCs by EPA Method 8260 (soil samples to be collected using field preservation in accordance with EPA Method 5035).
2	Confirm shallow groundwater flow direction. Evaluate VOC concentration trends over time. Collect data relevant to the potential for biodegradation.	Install seven shallow groundwater monitoring wells to approximately 15 to 20 feet bgs in northern portion of site (monitoring well locations may be adjusted pending results of grab groundwater samples). • Three of these wells will be pre-pack wells installed using direct push technology, and a grab groundwater sample will be collected from these borings prior to installation of the well. • Four of these wells will be part of nested, multi-port wells that will also allow collection of chemical and water level data from deeper groundwater (see Item 6, below). • Soil samples will be collected only if there are field indications of impacts (with the exception of the well planned in the highest PCE concentration area, where soil samples will be collected at two depths in the vadose zone based on field indications of impacts (PID readings, odor, staining) or, in the absence of field indications of impacts, at 5 and 10 feet bgs.). • Groundwater monitoring frequency to be determined.	To evaluate groundwater flow direction, a minimum of three wells is needed; the seven proposed wells will provide for a more robust analysis. It is proposed that the wells be spaced throughout the northern portion of the north parcel to evaluate concentration trends while also evaluating groundwater flow direction. • In the west, one well is proposed at the western property boundary at the location where PCE concentrations are highest (the location may be adjusted based on the results of grab groundwater samples to be collected nearby). • A second well is proposed in the area with the highest concentrations of PCE in groundwater, north of Building A. • Three wells are proposed in a north-south line through the middle of the northern parking lot to evaluate spatial variations in PCE and TCE concentrations. • A sixth well is proposed just southwest (downgradent) of the former sump, where VOCs have been detected in groundwater. • A seventh well is proposed at the eastern property boundary; its distance from the northern property boundary is based on where existing data indicate the highest concentrations of PCE are present.	*Groundwater:* VOCs by EPA Method 8260, dissolved oxygen, oxidation/reduction potential, temperature, pH, and specific conductance. Soil: VOCs by EPA Method 8260 (soil samples to be collected using field preservation in accordance with EPA Method 5035).
3	Evaluate groundwater impacts along western property boundary (presumed upgradient boundary).	Advance a transect of three borings to approximately 20 feet bgs at the western property boundary for collection of soil and grab groundwater samples (one will be converted to a monitoring well; see Item 2, above). Soil samples will be collected at two depths in the vadose zone based on field indications of impacts (PID readings, odor, staining) or, in the absence of field indications of impacts, at 5 and 10 feet bgs.	PCE was detected in boring NM-B-34, at the western property boundary. A transect of three additional borings is proposed at an approximately 15-foot spacing to the south to provide more data regarding PCE at the upgradient property boundary. Data from these borings may be used to modify the location of one of the monitoring wells.	*Groundwater:* VOCs by EPA Method 8260, dissolved oxygen, oxidation/reduction potential, temperature, pH, and specific conductance. *Soil:* VOCs by EPA Method 8260 (soil samples to be collected using field preservation in accordance with EPA Method 5035).
4	Evaluate deeper lithology at the site.	Advance two direct push borings to approximately 75 feet bgs (one downgradient of the highest concentration area and one upgradient). Soil samples will be collected only if there are field indications of impacts. Soil lithology will be logged.	One boring is proposed adjacent to the location of the westernmost nested well, and one is proposed between the two nested wells in the central portion of the northern parking lot (see Item 6, below). No borings are proposed in the highest concentration area, as a precaution to avoid potential cross-contamination.	None

TABLE 2

DATA GAPS AND PROPOSED INVESTIGATION
Crown Chevrolet
7544 Dublin Boulevard
Dublin, California

Item	Data Gap	Proposed Investigation	Rationale	Analysis
5	Evaluate the possible presence of impacts to deeper groundwater. Evaluate deeper groundwater concentration trends over time. Obtain data regarding the vertical groundwater gradient. Obtain more lithological data below 20 feet bgs.	Install four continuous multichannel tubing (CMT) groundwater monitoring wells (aka multi-port wells) to approximately 65 feet bgs in the northern parking lot with ports at three depths (monitoring well locations may be adjusted pending results of shallow grab groundwater samples; we will discuss any potential changes with ACEH before proceeding). Groundwater monitoring frequency to be determined. Soil samples will be collected only if there are field indications of impacts. Soil lithology will be logged. However, information regarding the moisture content of soil may not be reliable using sonic drilling technology (two borings will be logged using direct push technology; see Item 4, above).	One well is proposed at the western (upgradient) property boundary to confirm that there are no deeper groundwater impacts from upgradient. Two wells are proposed near the center of the northern parking lot to evaluate potential impacts in an area where deeper impacts, if any, would most likely to be found. One well is proposed at the eastern (downgradient) property boundary to confirm that there are no impacts extending off-site. Port depths will be chosen based on the locations of saturated soils (as logged in direct push borings; see Item 4, above), but are expected at approximately 15, 45, and 60 feet bgs.	*Groundwater:* VOCs by EPA Method 8260, dissolved oxygen, oxidation/reduction potential, temperature, pH, and specific conductance.
6	Evaluate possible off-site migration of impacted soil vapor in the downgradient direction (east). Evaluate concentration trends over time.	Install 4 temporary nested soil vapor probes at approximately 4 and 8 feet bgs along the eastern property boundary. Based on the results of the sampling, two sets of nested probes will be converted to vapor monitoring wells to allow for evaluation of VOC concentration trends over time.	Available data indicate that PCE and TCE are present in soil vapor in the eastern portion of the northern parking lot. Samples are proposed on approximately 50-foot intervals along the eastern property boundary to provide a transect of concentrations through the vapor plume. The depths of 4 and 8 feet bgs are chosen to provide data closest to the source (i.e., groundwater) while avoiding saturated soil, and also provide shallower data to help evaluate potential attenuation within the soil column. Two sets of nested vapor probes will be converted into vapor monitoring wells (by installing well boxes at ground surface); the locations of the permanent wells will be chosen based on the results of samples from the temporary probes.	*Soil vapor* : VOCs by EPA Method TO-15.
7	Evaluate potential for off-site migration of impacted groundwater in the downgradient direction (east).	Advance two borings to approximately 20 feet bgs in the parking lot of the property east of the Crown site for collection of grab groundwater samples.	Two borings are proposed off-site, on the property east of the Crown site, just east of the building in the expected area of highest potential VOC concentrations.	*Groundwater:* VOCs by EPA Method 8260, dissolved oxygen, oxidation/reduction potential, temperature, pH, and specific conductance.
8	Evaluate VOC concentrations just north of the highest concentration area.	Advance two borings to approximately 20 feet bgs north of Building A for collection of soil and grab groundwater samples. Soil samples will be collected at two depths in the vadose zone. Soil samples will be collected based on field indications of impacts (PID readings, odor, staining) or, in the absence of field indications of impacts, at 5 and 10 feet bgs.	The highest concentrations of PCE in groundwater were detected at boring NM-B-32, just north of Building A. The nearest available data to the north are approximately 75 feet away. One of the borings will be advanced approximately 20 feet north of NM-B-32 to provide data close to the highest concentration area. A second boring will be advanced approximately halfway between the first boring and former boring NM-B-33 to provide additional spatial data for contouring purposes. These borings will be part of a transect in the highest concentration area.	*Groundwater:* VOCs by EPA Method 8260, dissolved oxygen, oxidation/reduction potential, temperature, pH, and specific conductance. *Soil:* VOCs by EPA Method 8260 (soil samples to be collected using field preservation in accordance with EPA Method 5035).
9	Evaluate VOC concentrations in soil vapor in the south parcel of the site.	Install four temporary soil vapor probes at approximately 5 feet bgs around boring SV-25, where PCE was detected in soil vapor at a low concentration.	PCE was detected in soil vapor sample SV-25 in the southern parcel, although was not detected in groundwater in that area. Three probes will be installed approximately 30 feet from of boring SV-25 to attempt to delineate the extent of impacts. A fourth probe is proposed west of the original sample, close to the property boundary and the location of mapped utility lines, which may be a potential conduit, to evaluate potential impacts from the west.	*Soil vapor* : VOCs by EPA Method TO-15.
10	Obtain additional information regarding subsurface structures and utilities to further evaluate migration pathways and sources.	Ground penetrating radar (GPR) and other utility locating methodologies will be used, as appropriate, to further evaluate the presence of unknown utilities and structures at the site.	Utilities have been identified at the site that include an on-site sewer lateral and drain line, and shallow water, electric, and gas lines. Given the current understanding of the distribution of PCE in groundwater at the site, it is possible that other subsurface utilities, and specifically sewer laterals, exist that may act as a source or migration pathway for distribution of VOCs in the subsurface.	NA

TABLE 2

DATA GAPS AND PROPOSED INVESTIGATION
Crown Chevrolet
7544 Dublin Boulevard
Dublin, California

Item	Data Gap	Proposed Investigation	Rationale	Analysis
11	Perform a formal well survey to identify water-producing wells.	A formal well survey will be performed to identify water-producing, monitoring, and cathodic protection wells. Data will be obtained regarding nearby, permitted wells from the California Department of Water Resources and Zone 7 Water Agency (Item 11 on Table 2).	If groundwater downgradient of the site is being used for supply purposes, it is possible that VOCs related to the site could be impacting groundwater.	NA

Notes
1. Borings for soil/grab groundwater collection may be terminated at 15 feet bgs if groundwater is encountered and grab groundwater sample collection is possible at that depth. Soil lithology will be logged at all borings.

Abbreviations
bgs = below ground surface
EPA = U.S. Environmental Protection Agency
PCE = tetrachloroethene
TPHg = total petroleum hydrocarbons quantified as gasoline
VOCs = volatile organic compounds