From:	Detterman, Karel, Env. Health
To:	Hawk, Christopher (Penske) (Christopher.Hawk@penske.com); "Hey, Eva"; Doran, Neil
Cc:	Roe, Dilan, Env. Health
Subject:	E-mail 1 of 2: Fuel Leak Case RO354 - Hertz-Penske, Geotracker Global ID TO600101062, 725 Julie Ann Way, Oakland, CA 94621
Date:	Wednesday, April 30, 2014 3:56:17 PM
Attachments:	Attachment_1_and_ftpUploadInstructions_2012_07_25.pdf RO354 Karel and Dilans comments on figures_tables for 3-10-2014 meeting.pdf

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Hello Chris, Eva, and Neil:

Thank you for participating in the meeting/conference call with Alameda County Environmental Health (ACEH) at our office on March 10, 2014 for a discussion of the *No Further Action Request* (*NFA Request*) dated January 14, 2014 prepared and submitted on your behalf by Stantec. Thank you for submitting the *NFA Request*.

ACEH staff has reviewed the case file, including the *NFA Request* in conjunction with the State Water Resources Control Board's (SWRCB) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on our review, the Site Conceptual Model (SCM) fails to support closure for residential standards due to non compliance with the LTCP General Criteria d (free product removal), e (Site Conceptual Model), f (secondary source removal), Media Specific Criteria for Groundwater and Direct Contact and Outdoor Air Exposure.

The following bulleted list summarizes the main discussion topics during the meeting:

1. The case meets LTCP's Media Specific Criteria: Direct Contact to Outdoor Air for *commercial* use;
    a. We understand that the RP would prefer to close the site to residential standards;
    b. Data is needed for 0 - 5' below ground surface (bgs) for shallow soil across the site;
    c. Boring SB-4 fails residential 5' to 10' bgs;
    d. Soil samples 2 through 5 taken during 10/10/1989 UST removal fail residential;
    e. No soil data for 0 – 5 feet bgs in vicinity of piping, dispenser island(s), and/or surface spills;
    f. Request verification of UST piping, dispenser island(s), shown on CORRES, PDF pages 86-92 and indicate on all site figures;
    g. Dispenser Islands: request historical infrastructure and samples on future site figures;
    h. Verify accurate locations of all monitoring wells, soil borings, and site structures with respect to each other and site buildings and landmarks (drainage channels, surrounding streets, etc.);
2. The case doesn't meet LTCP's Media Specific Criteria: Groundwater:
    a. Please use an extended site map(s) utilizing an aerial photographic base map with sufficient resolution to show the facility, delineation of streets and property boundaries within the adjacent neighborhood, drainage channels, monitoring wells, and soil borings;
    b. Well Survey: Please amend the well survey to include a well survey from the Alameda County Public Works Agency (ACPWA) because information from California Department of Water Resources and ACPWA is sufficiently different to warrant inclusion of both in the study;

c. Show distances from site to drainage channels;
d. Because of the site's close proximity to the San Francisco Bay, ecological risk is the most important criteria for this site;
    1. Provide physical dimensions such as width and depth of channels of the two drainage channels; determine whether or not channels are tidally influenced; and are channels losing or gaining;
    2. Provide distance of channels to San Francisco Bay;
e. Adequacy of monitoring well network:
    1. Many monitoring wells have continually submerged well screens;
    2. Need a depth discrete monitoring well network;
    3. Groundwater gradient flow direction varies – please include a rose diagram documenting direction variations of the groundwater gradient;
    4. Regarding March 2013 gradient figure: groundwater gradient near MW-8 is shown to be west-southwest and if MW-8 the most down gradient sentry well, what about the groundwater gradient near MW-5 and MW-6 shown to be towards the northwest? Potential data gap in vicinity of MW-8;
    5. Please provide plume map including soil boring/grab groundwater samples SB-1 through SB-8 with monitoring wells; All grab groundwater samples indirect evidence of free product;
    6. Depth discrete sampling event of 2/3/2011;
    7. Request a table with corrected groundwater elevations and free product concentrations;
    8. Soil concentrations indicate indirect evidence of free product at the site;
    9. Examine MW-6 with respect to plume stability and determine if channels are being impacted by free product/high concentrations of dissolved TPH;
f. MW-6 needs to be monitored and sampled on a regular basis as do all of the monitoring wells;
g. Add free product/sheen observations and well screen intervals to Groundwater Elevation Data Tables for all past, present and future groundwater monitoring events;
h. Has free product been removed to the extent practicable? An affirmative answer to this question could be important especially if excavation is preformed at a neighboring site and free product is encountered;
i. Please conduct another groundwater monitoring/sampling event and analyze all samples for VOCs and SVOCs. The last semi-annual event was November 2013.

Based on the discussions during our meeting, to advance your case to site closure, ACEH requests performance of an additional groundwater monitoring and sampling event using the eight monitoring wells and two observation wells followed by revision and submittal of the SCM and Data Gap Work Plan (if appropriate) using existing site and adjacent site data, then participation in a meeting in early July 2014 with ACEH to discuss the results and path forward.

TECHNICAL REPORT REQUEST

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Please upload the technical report to the ACEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with Attachment 1 and the following specified file naming convention and schedule:

- **June 30, 2014 –** Revised Site Conceptual Model and Data Gap Investigation Work Plan and Semi Annual Groundwater Monitoring and Sampling Report
  File to be named: RO354_SCM_WP_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.

I've attached the NFA Request text with comments to this e-mail and in a separate e-mail I will send the NFA Request tables and figures with comments.

Page 27 of the attachment to this e-mail can be found in pages 86-92 of *CORRES* and page 28 of the attachment can be found in ANALYT_R_1987-10-19, both on ACEH's ftp site.

Thank you,

Karel Detterman, PG
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Email: karel.detterman@acgov.org

PDF copies of case files can be downloaded at:

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

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