Hello Mr. Hawk:

Alameda County Environmental Health (ACEH) staff has reviewed the case file, including the March 13, 2015 *Data Gap Investigation Report* prepared on your behalf by Stantec Consulting Services, Inc. (Stantec). Thank you for submitting the Report. Based on ACEH staff review of the Report, we do not concur that the remaining data gaps have been addressed and therefore the site is not eligible for closure at this time. Our conclusion is based on the following technical comments pertaining to the data presented in the March 13, 2015 *Data Gap Investigation Report*:

TECHNICAL COMMENTS

1) Total petroleum hydrocarbons (TPH) as gasoline was detected at concentrations of 1,700 and 890 micrograms per liter (ug/l) in two of the six grab groundwater samples (SB-12 and SB-13, respectively). These concentrations exceed the aquatic habitat Environmental Screening Level (ESL) of 500 micrograms per liter as indicated in Table F-2C, San Francisco Bay Regional Water Quality Control Board's (SFBRWQCB's). The borings from which these samples were collected are located immediately adjacent to and within approximately 10 feet of the top of the eastern bank of the drainage channel. Strong hydrocarbon odors and sheen were noted during sample collection.

2) TPH as diesel (TPHd), the contaminant with the highest historic concentrations at the site, was not analyzed as proposed in the November 21, 2014 *Data Gap Investigation Work Plan* and as approved by Alameda County Environmental Health due to insufficient sample volume. Based on the current results of the TPHg in the grab groundwater samples, it is reasonable to assume that TPHd concentrations would be detected at the drainage ditch bank also and likely at higher concentrations than that detected for TPHg.

3) Given the close proximity of the boring locations to the earthen drainage ditch bank, there is a likely potential for direct-exposure of aquatic biota to the elevated TPHd and TPHg concentrations without the mitigating effect of dilution between groundwater and surface water.

Therefore, at this juncture, please re-implement the approved November 20, 2014 *Data Gap Investigation Work Plan* to collect the data that was not collected in January 2015. Please ensure collection of adequate sample volume of all grab groundwater samples to enable TPHd and TDS analysis on all groundwater samples. Please anticipate slow groundwater recharge which may require the installation of temporary wells to ensure adequate sample collection.

TECHNICAL REPORT REQUEST

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 the following specified file naming convention and schedule:

- **August 7, 2015 –** Soil and Groundwater Investigation Report
    File to be named: RO354_SWI_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.

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PDF copies of case files can be downloaded at:

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