

## Nowell, Keith, Env. Health

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**Subject:** Fuel leak case RO359- Dave's Station 225 Telegraph Ave., Oakland; GeoTracker global ID T0600100431, CUF claim # 4127

Dear Mr. Trommer,

Alameda County Environmental Health (ACEH) thanks you for the opportunity to discuss the subject fuel leak case with Cleanup Fund (CUF) representatives Pat Cullen, and Lisa Babcock and yourself today, Tuesday, September 16, 2014. As expressed in the conference call, ACEH is of the opinion the site is close to closure, having a few data gaps to be addressed as outlined below.

- ACEH is of the opinion the well search is incomplete. The Responsible Party well search consisted a review of the Department of Water Resources database and did not include a search of the Alameda County Public Works Agency database.
- ACEH is of the opinion the contaminant plume length is greater than 100 feet as MW-6, the down gradient off-site groundwater monitoring well, is more than 100 feet from the former UST pit and is at least 90 feet from the nearest potential contaminant source (dispenser island) and was most recently (last sampled on October 5, 2010) reported to contain 910 ug/L TPHg and 420 ug/L TPHd.
- While ACEH agrees with the rationale for naphthalene in gasoline formulations, ACEH is of the opinion that the rationale is valid for TPHg-only release sites. This case had releases associated with the waste oil (WO) tank. Numerous holes were observed in the waste oil UST at the time of its removal and two rounds of over excavation were performed in the WO UST area. The naphthalene concentration in waste oil is known to be higher than that found in TPHg.

Additionally, a Corrective Action Plan (CAP), approved by ACEH on November 8, 2012, was implemented in June 2013 and the report released in December 2013. Since the recently implemented CAP, only one round of groundwater monitoring has been conducted.

ACEH issued a directive on August 29, 2014 requesting an updated well search to include the Alameda County Public Works Agency (ACPWA) database with a well search radius of 2,000 feet – the maximum plume length (855 feet for total petroleum hydrocarbons as gasoline) and a 1,000-foot buffer per the Low Threat Underground Storage Tank Case Closure Policy (LTCP) – and to conduct an additional round of groundwater monitoring to evaluate the effectiveness of the CAP. ACEH requested the scope of groundwater analysis include naphthalene. ACEH requested the groundwater analytical data for review prior to making a determination if a soil vapor study should be conducted. ACEH also stated that groundwater monitoring well MW-6 needs to be incorporated in sampling of the well network.

CUF Comments:

- Expressed concern regarding the excessive number of data points generated by a 2,000-foot radius and inquired if it was possible to search an 90° arc in the down gradient direction. ACEH said the Alameda County Public Works Agency (ACPWA) search was performed by computer based on an input radius distance and that it was far easier for the consultant to narrow down the data. ACEH also reported that data in the well search, if known, includes installation date, depth, well type, and well destruction date.
- As presented in the conference call, the CUF indicated that gasoline data should not be used when evaluating the stability and length of the plume as there are no water quality objectives (WQOs) for gasoline. ACEH pointed out that gasoline is used in the LTCP *Technical Justification for Groundwater Plume Length, Indicator Constituents, Concentrations, Buffer Distances (Separation Distances) to Receptors* (LTCP Guidance; SWRCB 2012).

- The CUF complimented ACEH for including naphthalene in the scope of analysis for groundwater and said they wished this was done more often

The conclusion of the conference call pertaining to this site the CUF was in agreement with ACEH and its August 29, 2014 directive.

Again, thank you for the opportunity to discuss this case with you.

Regards,  
Keith Nowell

Keith Nowell PG, CHG  
Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda , CA 94502-6540  
phone: 510 / 567 - 6764  
fax: 510 / 337 - 9335  
email: keith.nowell@acgov.org

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