

Nowell, Keith, Env. Health

To: angelcpt@gmail.com; peggy.h.garcia@sbcglobal.net
Cc: sbittinger@stratusinc.net; Griffin, Leroy; Roe, Dilan, Env. Health
Subject: Fuel Leak Case No. RO0000413, Geotracker Global ID T060010667, USTCF Claim No. 6378, Grit Auto Repair & Service

Dear Ms. LaMarca and Ms. Garcia,

Alameda County Environmental Health (ACEH) has recently been contacted by the State Water Resources Control Board (SWRCB) regarding potential closure of the site under the SWRCBs Low Threat Underground Storage Tank Case Closure Policy (LTCP). The SWRCB is of the opinion that the presence of chlorinated solvents are independent of the petroleum release. ACEH has reviewed the case file for the subject site (Site). ACEH's review indicates the petroleum hydrocarbon portion of the case may be a candidate for closure in the near future under the LTCP provided concerns regarding potential petroleum hydrocarbon constituent impacts to the nearby off-site production well, referenced in the March 23, 1994 Soil and Groundwater Testing Report prepared by Hoexter Consulting for the Site, are addressed. The nearby off-site production well is described as an active 4-inch-diameter irrigation well reported to be approximately 80 feet deep and located approximately 250 feet west of the Site. However, if the fuel leak case is closed, ACEH will open a Site Cleanup Program (SCP) case to address the chlorinated solvents.

Therefore at this juncture, please address the following technical comments and submit the requested document by the date specified below:

Technical Comments

Petroleum Fuel Release:

- Well Status_ – Please determine if the well is actively or periodically being used, or if use of the well been discontinued. Please determine what the groundwater extracted from the well is being used for and provide construction details if available (such as well depth, screened interval, sanitary seal length) for the well.
- Petroleum Hydrocarbon Constituent Groundwater Impact Evaluation – Based on the apparent inconsistency in groundwater flow direction, it is unclear to ACEH that the petroleum hydrocarbon contaminant plume has been delineated. Please evaluate the plume length analyzing the well groundwater for petroleum hydrocarbon constituents. Analyze well groundwater for total petroleum hydrocarbons as gasoline (TPHg), benzene, toluene, ethylbenzene, and xylenes (BTEX), fuel oxygenates (FOs) methyl tertiary butyl ether (MTBE), diisopropyl ether (DIPE), tertiary amyl methyl ether (TAME), and tertiary butyl alcohol (TBA), the lead scavengers 1,2-dibromoethane (EDB) and 1,2-dichloroethane (EDC), and naphthalene. Please analyze use EPA Test Method 8260B for TPHg, BTEX, FOs, lead scavenger and naphthalene analysis.

Chlorinated Solvent:

- Chlorinated Solvent Constituent Groundwater Impact Evaluation – It is unclear to ACEH that the chlorinated solvent plume has been defined. Please evaluate the plume length by analyzing the off-site production well groundwater for chlorinated solvent (non-petroleum volatile organic compounds) constituents using EPA Test Method 8260B.
- Corrective Action Plan – Please provide a status update on the Corrective Action Plan (CAP) implementation.

Laboratory Reporting:

- Groundwater Monitoring – The laboratory reporting limits should be low enough to compare analyte concentrations to the appropriate regulatory threshold values.

Please sample the well and provide a groundwater monitoring and CAP Implementation Plan report addressing the items discussed above.

Technical Report Request

Please upload technical report 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:

- **May 14, 2014 – Groundwater Monitoring and CAP Status Report** (file name: RO0000413_GWM_R_YYYY-MM-DD)

Thank you for your cooperation. ACEH looks forward to working with you and your consultant 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.

Respectfully,

Keith Nowell

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PDF copies of case files can be reviewed/downloaded at:

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