

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

COLLEEN CHAWLA, Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY, SUITE 250
ALAMEDA, CA 94502
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November 26, 2018

Ms. Andrea Wing
Equilon Enterprises LLC
Dbas Shell Oil Products, US
20945 S. Wilmington Avenue
Carson, CA 90810
(Sent via electronic mail to:
andrea.wing@shell.com)

Foothill Blvd. LLC
c/o Linli Lee
141 Woodland Way
Piedmont, CA 94611
(Sent via electronic mail to:
linliphua@yahoo.com)

Mr. Walter Watters
101 Jasmine Creek Dr.
Corona Del Mar, CA 92625

Subject: Conditional Work Plan Approval; Fuel Leak Case No. RO0000415 and GeoTracker Global ID T0600101065, Shell #13-5686, 4411 Foothill Blvd, Oakland, CA 94601

Dear Responsible Parties:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *Soil Gas Investigation Report and Data Gap Work Plan*, dated September 28, 2018, that was submitted on your behalf by AECOM. Thank you for submitting the report and work plan. The investigation portion of the report documented the resampling of soil vapor wells V-2, V-3, and V-4 located at the site. The vapor data from V-4 could not be evaluated due to the presence of helium in the vapor sample over the 5% tracer threshold cited in Department of Toxic Substances Control (DTSC) guidance for acceptability of a sample. The report also indicated that subslab vapor points SSV-1 and SSV-2, had been destroyed and filled with grout since the last subslab vapor sampling event in February 2013, and that SSV-3 could not be located and is additionally presumed to have been destroyed.

The data gap work plan proposed the installation of soil vapor well V-17 at 1718 High Street proximal but slightly downgradient of the residential apartment building with an occupied basement, for the purpose of collecting a soil vapor sample. The vapor well is proposed to be installed at a depth of approximately 8.5 feet below grade surface (bgs) in order to collect the vapor sample five feet below the foundation of the basement in accordance with the Low Threat Closure Policy (LTCP).

Based on ACDEH staff review of the referenced documents and of the case file we generally concur with the recently proposed scope of work, provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or technical comments below is proposed. We request that you address the following technical comments, submit the requested document, and upon ACDEH approval, perform the proposed work, and send us the technical reports requested below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Conditional Work Plan Approval** – The referenced work plan proposes several actions with which ACDEH is in general agreement of undertaking; however, ACDEH requests concurrent additional data collection. Please submit the results of the investigation in a report by the date identified below.
 - a. **Vapor Well Location** – As noted above, the location of proposed vapor well V-17 is located within proximity of but downgradient of the occupied basement at 1718 High Street. Provided the well is installed north of the stairs to the front door, and within three feet of the foundation the well location appears appropriate. ACDEH notes that should access to the property be an issue an alternative location may be present at the southwestern corner of the adjacent building, 1724 -1728 High Street.

- b. **Vapor Well V-4 Resampling** – ACDEH is in agreement that it is necessary to resample vapor well V-4. Should helium again be detected at a concentration greater than 5%, ACDEH requests to be informed and requests the reinstallation of the vapor well be included in the Technical Comment 2.
- c. **Vapor Resampling** – The sampling of soil vapor wells indicate vapor concentrations beneath the site have substantially decreased since the previous sampling event in May 2011; however, depending on location fail to meet LTCP vapor intrusion criteria at a site which appears to have a five foot bioattenuation interval with less than 100 milligrams per kilogram (mg/kg) combined TPH (TPH as gasoline and TPH as diesel). This either requires a minimum of 4% oxygen or groundwater benzene concentrations of less than 100 micrograms per liter (μ /l). Resampled vapor wells V-2 and V-3 fail to meet the LTCP criteria due to the presence of oxygen at less than four percent, at a site with benzene recently up to 160 μ /l (Please also note that petroleum sites must be analyzed under the LTCP, unless subslab or indoor air samples are required at a site, for which there are no LTCP values).

Selected other vapor wells also do not either meet the LTCP criteria, or lack data required for evaluation under the LTCP. Therefore, ACDEH also requests the resampling of vapor wells V-5 (<4% oxygen and lack of naphthalene vapor data), V-6 (lack of naphthalene vapor data and potential temporal variability), V-7 and V-8 (lack of naphthalene vapor data), V-12 (lack of naphthalene vapor and oxygen data), V-13 to V-16 (temporal variability or inability to successfully collect a sample at V-15).

Additionally at V-16, the detection limit for naphthalene in V-16 did not meet the residential LTCP goal for a site without a bioattenuation zone. Please note that due to the lack of a soil sample at V-16 ACDEH cannot determine if an alternative LTCP vapor intrusion criteria should be utilized to ensure the residential apartment building at 1724 – 1728 High Street is adequately protected from contamination beneath the property (Specifically, please refer to soil analytical data from soil bore S-12 at 5.5 feet). The sampling of V-15 also appears to be warranted due to the presence of the highest current groundwater contaminant concentrations in groundwater well S-13.

- 2. **Work Plan Request** – While ACDEH is in agreement with the proposed work discussed above, ACDEH notes that additional data gaps remain at the site as partly discussed in the meeting of November 1, 2018, and as previously discussed in the May 30, 2018 directive letter. These include the following:
 - a. **Subslab Well SSV-3** – Review of previously generated analytical data from this well indicates that vapor concentrations (TPHg and potentially benzene dependent on temporal variability) for subslab vapor did not meet Environmental Screening Levels (ESLs) concentrations. Therefore, due to the potentially unknown source for vapor at this location it appears appropriate to reinstall the vapor location to verify that the vapor source has been reduced with time. ACDEH requests the submittal of a work plan by the date identified below.
 - b. **Groundwater Plume Delineation** – Thank you for bringing existing cross sections to the attention of ACDEH. The ACDEH review of cross section B – B' appears to indicate the presence of a "paleochannel" beneath the site and vicinity. ACDEH is in agreement that groundwater concentrations downgradient of well S-13, to well C-11, document substantial reduction; however, due to the strong probability of other "paleochannels" at this location that can influence or control the contaminant flow path, ACDEH requests a work plan to investigate groundwater concentrations laterally along High and Bond Streets to ensure the groundwater plume has been defined. ACDEH requests the submittal of a work plan by the date identified below.
 - c. **4320 Bond Well** – ACDEH recognizes that the water supply well at this address is no longer in use. California Department of Water Resources (DWR) requires the destruction of all wells not

used in over a year. Consequently, ACDEH requests an effort to locate and destroy the well as it remains a vertical conduit with a groundwater plume.

TECHNICAL REPORT REQUEST

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

- **February 2, 2019** – Site Investigation Report and Data Gap Work Plan
File to be named RO415_WP_R_YYYY-mm-dd
- **February 25, 2019** – Second Semi-Annual 2018 Groundwater Monitoring Report
File to be named: RO415_GWM_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 your email address does not appear on the cover page of this notification, ACDEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

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

Sincerely,



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

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

cc: Carmen Goodell, AECOM, 300 Lakeside Drive, Suite 400, Oakland, CA 94612; (Sent via electronic mail to: carmen.goodell@aecom.com)

Bill Phua, 141 Woodland Way, Piedmont, CA 94611; (Sent via electronic mail to: billphua@yahoo.com)

Dilan Roe, ACDEH, (Sent via electronic mail to: dilan.roe@acgov.org)

Paresh Khatri, ACDEH; (Sent via electronic mail to: paresh.khatri@acgov.org)

Mark Detterman, ACDEH, (Sent via electronic mail to: mark.detterman@acgov.org)

Electronic File; GeoTracker

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| Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) | REVISION DATE: December 14, 2017 |
| | ISSUE DATE: July 25, 2012 |
| | PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016 |
| SECTION: ACDEH Procedures | SUBJECT: Responsible Party(ies) Legal Requirements / Obligations |

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

| Report Title | Sample Period | PDF Report | GEO_MAPS | Sample ID | Matrix | GEO_Z | GEO_XY | GEO_BORE | GEO_WELL | EDF |
|---|---------------|------------|----------|-----------|--------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 2016 Subsurface Investigation Report | 2016 S1 | ✓ | ✓ | Effluent | SO | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ✓ |
| 2012 Site Assessment Work Plan | 2012 | ✓ | ✓ | | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2010 GW Investigation Report | 2008 Q4 | ✓ | ✓ | SB-10 | W | ✓ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ✓ |
| | | | | SB-10-6 | SO | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ✓ |
| | | | | MW-1 | WG | ✓ | ✓ | ✓ | ✓ | ✓ |
| | | | | SW-1 | W | ✓ | ✓ | ✓ | ✓ | ✓ |

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

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| Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) | REVISION DATE: NA |
| | ISSUE DATE: December 14, 2017 |
| | PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016 |
| SECTION: ACDEH Procedures | SUBJECT: Responsible Party(ies) Legal Requirements / Obligations |

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) 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 licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.