

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

COLLEEN CHAWLA, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY, SUITE 250
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

21 August 2018

Andrew Saberi
Sabek, Inc.
1045 Airport Blvd.
South San Francisco, CA 94080
(Sent via E-mail to: tsaberi@aol.com)

Andrea Wing
Equilon Enterprises dba Shell Oil Products US
20945 S. Wilmington Ave.
Carson, CA 90810-1039
(Sent via E-mail to: andrea.wing@shell.com)

Som Gupta
c/o Carmerlengo & Johnson
500 Airport Blvd.
Burlingame, CA 94010

Subject: Fuel Leak Case No. RO0000433 and GeoTracker Global ID T0600101691, Shell / Sabek Inc, 1230 14th Street, Oakland, CA 94607 –Additional Investigation Report and Request for Additional Sampling and Reporting

Dear Responsible Parties:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file for the above-referenced site, including the *Additional Investigation Report* (“the Report”), dated 15 July 2018, and prepared by Pangea Environmental Services, Inc. (Pangea), on behalf of Andrew Saberi. The Report responds to ACDEH’s directive letter for the site, dated 27 February 2018.

Pangea collected and analyzed soil and groundwater samples from borings DG-1 and DG-2; soil and soil gas samples from borings/wells SG-7A/B, SG-8A/B, SG-9A/B, and VMP-1B; and a soil gas sample from well VMP-1 in April 2018. Pangea concludes in the Report:

- Potential human and environmental health risk from chemicals in the site subsurface is below acceptable levels, as defined by the State of California and the United States Environmental Protection Agency (USEPA).
- Vapor intrusion to surrounding residential structures from residual site contamination is unlikely.
- VOCs were detected in soil gas at concentrations below the Tier 1 Environmental Screening Levels (ESLs).
- The site generally meets the media-specific criteria for low threat closure.
- Pangea recommends additional sampling to further validate the conceptual site model (CSM).

We request that you conduct additional groundwater sample collection and analysis concurrent with the August 2018 groundwater monitoring event and address the following technical comments as part of an expanded monitoring report. Provide 72-hour written notification to robert.schultz@acgov.org prior to the start of field activities. Send us the reports described below according to the specified schedule.

TECHNICAL COMMENTS

ACDEH requests that you address the following technical comments in the technical reports requested below:

1. **Soil Gas Wells SG-8B and SG-9B.** Due to elevated groundwater levels, soil gas wells SG-8B and SG-9B could not be sampled. If water levels are lower during the August 2018 monitoring event, a second attempt should be made to sample these wells.
2. **Soil Gas Sampling and Analysis.** Well VMP-1B should be resampled and samples analyzed for VOCs.
3. **VOCs in Soil Gas.** VOCs detected in soil gas were not summarized in a data table. The analytical results for all chemicals with detectable concentrations need to be summarized in a data table. In addition, analytical results for chemicals with elevated detection limits (if applicable) need to be summarized in the table.
4. **Groundwater Sampling and Analysis.** Groundwater samples collected in August 2018 as part of the monitoring event should be analyzed for naphthalene and 1,2-dibromoethane (EDB) to adequately define the extent of these compounds in site groundwater.
5. **Results Reporting and Low Threat Closure Evaluation.** The Additional Investigation Report should include a comparison of site conditions to the LTCP criteria. This evaluation should be supported by figures of chemical concentrations in soil, soil gas, and groundwater. Please compare site conditions to both general and media-specific criteria.
6. **Summary of Residual Impacts.** Please provide depth-specific analysis of the likely extent of (1) petroleum hydrocarbons, (2) metals, and (3) polycyclic aromatic hydrocarbons (PAHs) in site soil (e.g., isoconcentration maps). Note areas, if any, where additional sampling may be warranted for future residential site use on your figures. No additional soil investigation appears necessary for case closure under the LTCP, which assumes current land use at the site.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

ACDEH requires a Submittal Acknowledgement Statement, signed by the Responsible Party (RP), as a cover letter to technical reports and submittals. The requirement is described in Attachment 1. The language for the Submittal Acknowledgement Statement is as follows:

"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 Resources Control Board's GeoTracker website."

Mr. Saberi, Mr. Gupta, and Ms. Wing
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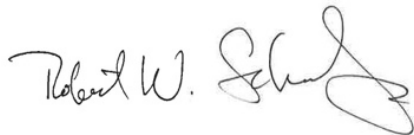
TECHNICAL REPORT REQUEST

Please upload technical reports to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- 31 October 2018 – Additional Investigation Report
File to be named: RO0000433_SWI_yyyy-mm-dd

If you have any questions, please call me at (510) 567-6721 or send me an electronic mail message at robert.schultz@acgov.org. Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Sincerely,



Robert W. Schultz, CHG
Senior Hazardous Materials Specialist

Attachment: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations &
ACEH Electronic Report Upload (ftp) Instructions

cc: Bob Clark-Riddell, Pangea Environmental, 1710 Franklin Street, Suite 200, Oakland, CA 94612
(Sent via E-mail to: briddell@pangeaenv.com)
Michael Leslie, Caldwell, Leslie & Proctor, 725 South Figueroa Street, 31st Floor, Los Angeles, CA
90017-5524
(Sent via E-mail to: mack@caldwell-leslie.com)
William Paynter, Law Offices of William H. Paynter, 809 Broadway, Suite 6, Sonoma, CA 94576
Michael Taffet, Oak Center Neighborhood Association
(Sent via E-mail to: mjtaffet@gmail.com)
Ellen Wyrick-Parkinson, 1420 Magnolia Street, Oakland, CA 94607
M. Willingham, 1418-1420 Union Street, Oakland, CA 94607
Dorine Kohn, Poeschl & Kohn LLP, 825 Washington Street, Suite 301, Oakland, CA 94607
Dilan Roe, ACEH (Sent via E-mail to: dilan.roe@acgov.org)
GeoTracker, eFile

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

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.