

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



OUT
03-17-05

March 16, 2005

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

Michael J. Benner and Barbara Roberts, Cotrustees
Benner Automotive
488 – 25th St.
Oakland, CA 94612

Dear Mr. Benner and Ms. Roberts:

Subject: Fuel Leak Case No. RO0002518, Benner Automotive, 488 – 25th St.,
Oakland, CA 94612

Alameda County Environmental Health (ACEH) staff has reviewed "Additional Site Characterization Report" dated August 9, 2004, prepared by Stellar Environmental Solutions. We request that you address the technical comments and send us the technical report requested below.

TECHNICAL COMMENTS

- 1) Construction of Monitoring Wells – Only the proposed locations for three groundwater monitoring wells were provided. Please note that nested wells will not be allowed. Please provide the following information:
 - a. Drilling method for construction of monitoring wells, including decontamination procedures.
 1. Expected depth and diameter of monitoring wells
 2. Expected drilling date
 3. Sampling method and sampling interval (split spoon, at changes of lithology, at the soil/water interface, etc.)
 4. Well design and construction specifications, including casing type, diameter, screen length and interval, and filter pack and screen slot specifications including rational for their selection (sieve analysis, etc.).
 5. Depth interval and type of seal
 6. Construction diagram for wells
 7. Well development method and criteria used for assessing adequacy of development (the time period between construction, development, and sampling should be noted)
 8. Plans for characterizing and disposing of cutting spoils and development water (contact your Regional Board or Local Implementing Agency for guidance if onsite disposal is proposed)
 9. Surveying plan for wells (requirements include surveying to established benchmark to 0.01 foot).

b. Groundwater sampling plans

1. Water level measurement method
 2. Method(s) for measuring free-product, observation of sheen and odor (must be done prior to well purging; the use of an interface probe when checking for the presence of free-product is highly recommended)
 3. Well purging procedures
 4. Well purge water characterization and disposal plans
 5. Water sample collection protocol (include the pH, conductivity, and temperature of groundwater prior to sampling)
 6. Compounds being sampled for and analytic methodology
 7. Quality assurance/Quality Control plan
 8. Chain of custody procedures
- 2) Extended Offsite Map - Please provide so that potential sampling locations further downgradient may be evaluated. Please include with your Work Plan.
 - 3) BH-11 - 130 mg/kg TVHg and 1,300 ug/l TVHg were detected upgradient of the source. Please examine the possibility of another source.
 - 4) BH-06 and BH-09 - 120,000 ug/l TVHg and 7,700 ug/l TVHg were detected, respectively. Thus, the further downgradient sampling location detected much greater concentrations than that adjacent to the tank excavation. Please explain.

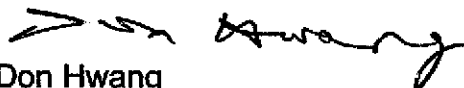
TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Don Hwang), according to the following schedule:

May 16, 2005 - Work Plan

This report is being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code. If you have any questions, please call me at (510) 567-6746.

Sincerely,



Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Bruce Rucker, Stellar Environmental Solutions, 2198-6th St., Suite 201,
Berkeley, CA 94710
Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
03-24-04

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

March 23, 2004

Michael J. Benner and Barbara Roberts, Cotrustees
Benner Automotive
488 - 25th St.
Oakland, CA 94612

Dear Mr. Benner and Ms. Roberts:

Subject: Fuel Leak Case No. RO0002518, Benner Automotive, 488 - 25th St., Oakland,
CA 94612

Alameda County Environmental Health (ACEH) staff has reviewed "Work Plan for Groundwater Characterization" dated February 13, 2004, prepared by Stellar Environmental Solutions. Additional boreholes are proposed to determine the location of the plume for optimal well locations. We request that you address the technical comments and send us the technical report requested below.

TECHNICAL COMMENTS

- 1) Proposed Borehole Locations - We would like justification for BH-11, otherwise we suggest that it be moved northeast of the tank excavation. Also, we suggest that BH-10 be moved eastward closer to the tank excavation. If you concur, please propose new borehole locations in the Work Plan Addendum.
- 2) Borehole Soil Sampling - The Work Plan does not propose to collect soil samples in the saturated zone. Petroleum product entrapped below the water table may be missed. Please propose collecting soil samples below the water table, which will account for entrapped petroleum product. Include in the Work Plan Addendum.
- 3) Hydraulic Gradients - The Work Plan does not propose to determine hydraulic gradient until groundwater monitoring wells are installed. We disagree, hydraulic gradient should be used to site the wells. Piezometers ought to be used to determine hydraulic gradient. Please incorporate into the Work Plan Addendum requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Don Hwang), according to the following schedule:

May 23, 2004 - Work Plan Addendum

Mr. Benner and Ms. Roberts

March 23, 2004

Page 2 of 2

This report is being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code. If you have any questions, please call me at (510) 567-6746.

Sincerely,

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Bruce Rucker, Stellar Environmental Solutions, 2198-6th St., Suite 201, Berkeley, CA
94710
Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



12-18-03

December 17, 2003

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

Michael J. Benner and Barbara Roberts, Cotrustees
Benner Automotive
488 - 25th St.
Oakland, CA 94612

Dear Mr. Benner and Ms. Roberts:

Subject: Fuel Leak Case No. RO0002518, Benner Automotive, 488 - 25th St., Oakland, CA 94612

Alameda County Environmental Health (ACEH) staff has reviewed "Preliminary Site Assessment Report" dated July 21, 2003, prepared by Stellar Environmental Solutions. Five exploratory boreholes, BH-1, BH-2, BH-3, BH-4, and BH-5, were advanced to depths of 16 to 25 feet on three sides of the former tank excavation (all within 10 feet of the former excavation), and one was advanced through the approximate center of the former excavation. Soil samples and grab groundwater samples were collected from each borehole. We request that you address the technical comments and send us the technical report requested below.

TECHNICAL COMMENTS

1. Preferential Pathway Study - Please submit map(s) and cross-sections showing the location and depth of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s). Evaluate the probability of the contaminant plumes encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper water aquifers. If so, propose a sampling plan for the trenches. Please incorporate into the Work Plan requested below.
2. Site Characterization - Up to 7,900 micrograms/liter (ug/l) Total Volatile Hydrocarbons-Gasoline (TVH-G) has been detected in onsite grab groundwater samples. The lateral and vertical extent of your dissolved contaminant plume is undefined. Please propose sampling locations to define the plumes associated with your site in the Work Plan requested below. Include geologic cross-sections and show soil and groundwater analytical results, utility conduits, well screens, etc., and explain your rationale for the additional sampling locations. You may want to consider performing an investigation to quickly define the location of the contaminant plume downgradient from the release site prior to installing the permanent monitoring network. That will allow you to optimize the location and depth of the permanent wells, thereby reducing the cost of the monitoring work. Collection of groundwater samples using a one-time direct push water-sampling tool would be appropriate for this investigation.

3. Proposed Groundwater Monitoring Wells - We feel that it would be premature to install monitoring wells without additional grab groundwater sampling to determine the location of the plume for optimal well locations. We request that depth discrete grab groundwater sampling be used. Include your proposal in the Work Plan requested below.
4. Hydraulic Gradients - Use groundwater elevations to calculate. Please show cumulative groundwater gradients in all future reports using a rose diagram with magnitude and direction.
5. Soil Analyses - We request that the analyses of the borings include the lead scavengers, EDB and EDC.
6. Groundwater Analyses - We request that you include the other fuel oxygenates Tertiary Amyl Methyl Ether (TAME), Ethyl Tertiary Butyl Ether (ETBE), Di-Isopropyl Ether (DIPE), and Tertiary Butyl Alcohol (TBA), Ethanol by EPA Method 8260 and the lead scavengers, Ethylene Dibromide (EDB), Ethylene Dichloride (EDC) for analyses of grab and monitoring well groundwater samples. If any of the latter compounds are detected, and are determined to be of concern (poses a risk to human health, the environment, or water resources) it is to be incorporated into your regular monitoring plan.
7. Well Survey - Locate wells within a quarter mile radius of the site. Show the location of the wells on a map and list well construction details for each well. Indicate which of the wells may be potential receptors.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Don Hwang), according to the following schedule:

February 17, 2004 - Work Plan including Preferential Pathway Study and Well Survey.

This report is being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code. If you have any questions, please call me at (510) 567-6746.

Sincerely,



Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Bruce Rucker, Stellar Environmental Solutions, 2198-6th St., Suite 201, Berkeley, CA 94710
Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



09-09-03

July 8, 2003

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

Michael J. Benner and Barbara Roberts, Cotrustees
Benner Automotive
488 - 25th St.
Oakland, CA 94612

Dear Mr. Benner and Ms. Roberts:

Subject: Fuel Leak Case No. RO0002518, Benner Automotive, 488 - 25th St., Oakland,
CA 94612

Alameda County Environmental Health (ACEH) staff has reviewed "Revisions to Workplan for Site Investigation" dated July 2, 2003, prepared by Stellar Environmental Solutions. The Workplan with these revisions is approved. We request that you perform the proposed work and send us the technical reports requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Don Hwang), according to the following schedule:

September 8, 2003 - Soil and Water Investigation Report

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code. If you have any questions, please call me at (510) 567-6746.

Sincerely,

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Bruce Rucker, Stellar Environmental Solutions, 2198-6th St., Suite 201, Berkeley, CA
94710
Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

June 26, 2003

Michael J. Benner and Barbara Roberts, Cotrustees
Benner Automotive
488 - 25th St.
Oakland, CA 94612

Dear Mr. Benner and Ms. Roberts:

Subject: Fuel Leak Case No. RO0002518, Benner Automotive, 488 - 25th St., Oakland, CA 94612

Alameda County Environmental Health (ACEH) staff has reviewed "Workplan for Site Investigation" dated April 21, 2003, prepared by Stellar Environmental Solutions. We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1) Plot Plan - "Previous and Proposed Sampling Locations" diagram was not drawn to scale. Indicate the distances of the proposed sampling locations from the former tank. The proposed sampling locations should be located as close to the excavation as possible. Future plot plans shall be drawn to scale.
- 2) Soil Sampling - The proposal to collect one soil sample from each borehole is inadequate. Soil samples shall be collected at a minimum of every 5 ft., including at changes of lithology, at the soil/groundwater interface, and at areas of obvious contamination.
- 3) Sampling Depth - The vertical extent of the plume must be delineated.
- 4) "Underground Storage Tank Unauthorized Release (Leak) / Contamination Site Report" - Please complete (enclosed).

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Don Hwang), according to the following schedule:

August 9, 2003 - Revised Workplan

Mr. Benner and Ms. Roberts

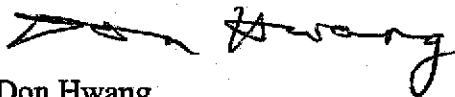
June 26, 2003

Page 2 of 2

60 days after Work Plan approval – Soil and Water Investigation Report

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code. If you have any questions, please call me at (510) 567-6746.

Sincerely,



Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Bruce Rucker, Stellar Environmental Solutions, 2198-6th St., Suite 201, Berkeley, CA
94710
Donna Drogos
File

Enclosure

UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

EMERGENCY <input type="checkbox"/> YES <input type="checkbox"/> NO		HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> YES <input type="checkbox"/> NO		FOR LOCAL AGENCY USE ONLY I HEREBY CERTIFY THAT I HAVE DISTRIBUTED THIS INFORMATION ACCORDING TO THE DISTRIBUTION SHOWN ON THE INSTRUCTION SHEET ON THE BACK PAGE OF THIS FORM.	
REPORT DATE M M D D Y Y		CASE #		SIGNED _____ DATE _____	
REPORTED BY	NAME OF INDIVIDUAL FILING REPORT		PHONE ()		SIGNATURE
	REPRESENTING <input type="checkbox"/> LOCAL AGENCY <input type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> OTHER _____		COMPANY OR AGENCY NAME		
	ADDRESS STREET CITY STATE ZIP				
RESPONSIBLE PARTY	NAME <input type="checkbox"/> UNKNOWN		CONTACT PERSON		PHONE ()
	ADDRESS STREET CITY STATE ZIP				
SITE LOCATION	FACILITY NAME (IF APPLICABLE)		OPERATOR		PHONE ()
	ADDRESS STREET CITY STATE ZIP				
	CROSS STREET		CITY		COUNTY ZIP
IMPLEMENTING AGENCIES	LOCAL AGENCY AGENCY NAME		CONTACT PERSON		PHONE ()
	REGIONAL BOARD				PHONE ()
SUBSTANCES INVOLVED	(1) NAME		QUANTITY LOST (GALLONS) _____ <input type="checkbox"/> UNKNOWN		
	(2)		_____ <input type="checkbox"/> UNKNOWN		
DISCOVERY/ABATEMENT	DATE DISCOVERED M M D D Y Y		HOW DISCOVERED <input type="checkbox"/> TANK TEST <input type="checkbox"/> TANK REMOVAL <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS <input type="checkbox"/> OTHER _____		
	DATE DISCHARGE BEGAN M M D D Y Y <input type="checkbox"/> UNKNOWN		METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input type="checkbox"/> REMOVE CONTENTS <input type="checkbox"/> CLOSE TANK & REMOVE <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> REPAIR TANK <input type="checkbox"/> CLOSE TANK & FILL IN PLACE <input type="checkbox"/> CHANGE PROCEDURE <input type="checkbox"/> REPLACE TANK <input type="checkbox"/> OTHER _____		
	HAS DISCHARGE BEEN STOPPED? <input type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE M M D D Y Y				
SOURCE/ CAUSE	SOURCE OF DISCHARGE <input type="checkbox"/> TANK LEAK <input type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER _____		CAUSE(S) <input type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input type="checkbox"/> SPILL <input type="checkbox"/> CORROSION <input type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER _____		
	CASE TYPE CHECK ONE ONLY <input type="checkbox"/> UNDETERMINED <input type="checkbox"/> SOIL ONLY <input type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)				
CURRENT STATUS	CHECK ONE ONLY <input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT WORKPLAN SUBMITTED <input type="checkbox"/> POLLUTION CHARACTERIZATION <input type="checkbox"/> LEAK BEING CONFIRMED <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT UNDERWAY <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS <input type="checkbox"/> REMEDIATION PLAN <input type="checkbox"/> CASE CLOSED (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> CLEANUP UNDERWAY				
	CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS)				
	<input type="checkbox"/> EXCAVATE & DISPOSE (ED) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (IT) <input type="checkbox"/> CAP SITE (CD) <input type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS) <input type="checkbox"/> CONTAINMENT BARRIER (CB) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> VENT SOIL (VS) <input type="checkbox"/> VACUUM EXTRACT (VE) <input type="checkbox"/> OTHER (OT) _____				
COMMENTS					

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



4-4-03

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

April 2, 2003

Joseph Benner
Benner Automotive
488 - 25th St.
Oakland, CA 94612

Dear Mr. Benner:

Subject: Fuel Leak Case No. RO0002518, Benner Automotive, 488 - 25th St., Oakland, CA 94612

Alameda County Environmental Health (ACEH) staff has reviewed "Gasoline Underground Storage Tank Removal" dated January 2003, prepared by Stellar Environmental Solutions. The removal of a gasoline tank on January 7, 2003 found a release had occurred. Soil samples collected beneath the tank detected up to 2,500 mg/kg Total Volatile Hydrocarbons-gasoline (TVHg). We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

Please investigate the extent of soil contamination and determine if groundwater contamination is present beneath your site. This type of initial investigation usually involves drilling one or more soil borings and collecting soil and groundwater samples for chemical analysis. If significant contamination is present, a groundwater monitoring well, in the verified downgradient direction, may be needed and groundwater sampled to properly characterize groundwater contamination.

UST CLEANUP FUND

Please be aware that you may be eligible for reimbursement of the costs of investigation from the California UST Cleanup Fund (Fund). In some cases, a deductible amount may apply. If you believe you meet the eligibility requirements, I strongly encourage you to contact the Fund for an application.

TECHNICAL REPORT REQUEST


Please submit technical reports to Alameda County Environmental Health (Attention: Don Hwang), according to the following schedule:

Mr. Benner
April 2, 2003
Page 2 of 2

June 2, 2003 – Workplan
60 days after Work Plan approval – Soil and Water Investigation Report

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code. If you have any questions, please call me at (510) 567-6746.

Sincerely,



Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Bruce Rucker, Stellar Environmental Solutions, 2198-6th St., Suite 201, Berkeley, CA
94710
Donna Drogos
File