



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

February 18, 2016

Rashid Ghafoor (Sent via e-mail to: rashidz1@aol.com)
226 Havenwood Circle
Pittsburg, CA 94567

Subject: Fuel Leak Case No. RO0002931 and GeoTracker Global ID T0600174667, Shore Acres
Gas, 403 E 12th St., Oakland, CA 94606

Dear Mr. Ghafoor:

Thank you for participating by phone with the meeting at our office on Tuesday November 17, 2015. The purpose of the meeting was to discuss our evaluation of the site data in reference to the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP), identify possible technical data gaps, and develop a path to case closure. ACEH understands that redevelopment is not currently under consideration and commercial property usage will continue.

Based on our meeting, ACEH understands that the site is currently leased to a Hand Car Wash business, which started operation in January-February 2015. The Hand Car Wash facility is comprised of an existing site trailer and numerous portable canopies arranged on the paved site.

Alameda County Environmental Health (ACEH) staff has evaluated the case file including the following documents prepared on your behalf by Environmental Compliance Group, LLC:

- *Interim Results and 2nd Quarter 2011 Groundwater Monitoring Event*, August 17, 2011
- *3rd Quarter 2011 Groundwater Monitoring and Interim Results Report Addendum Report*, October 13, 2011
- *Off Site Investigation and Dual Phase Pilot Test Results with 4th Quarter 2011 Groundwater Monitoring Report*, January 26, 2012
- *Corrective Action Plan (CAP)*, June 10, 2012
- *Revised Corrective Action Plan (CAP Addendum)*, October 25, 2012
- *Path to Closure Plan and Work Plan Report*, April 8, 2013
- *Application for New Authority to Construct*, April 17, 2013
- *Second Quarter 2013 Groundwater Monitoring Report*, June 17, 2013
- *Semi Annual Discharge Report*, October 31, 2014
- Discussion of Recent Remediation Activities in the *Quarterly Groundwater Monitoring and Sampling Reports*

TECHNICAL COMMENTS

- 1. Remediation System Optimization:** Dual Phase Extraction (DPE) with groundwater extraction/carbon polishing was the selected remedy in the CAP and CAP Addendum. Two DPE wells, VW-1 and VW-2 were installed in June 2011 and two additional DPE wells, VW-3 and VW-4 were installed in May 2013. The system was installed and operated periodically for a total of 14 months, from April 30, 2014 through June 27, 2014, August 18, 2014 through February 18, 2015, and August 11, 2015 through the present. Please evaluate the effectiveness of the remediation

system and present an analysis with recommendations in the Interim Remediation Report requested below.

- a. ACEH is concerned about the impact that the tenant's Hand Car Wash business may have on groundwater at the site. Please provide a description and a figure of the car wash's drainage, including where and how car wash effluent is managed at the site including waste water drainage and disposal.
 - b. After treatment system non-operation for a defined length of time, and prior to treatment system restart, please propose a method to monitor groundwater quality for rebound.
2. **Evaluation Of The Groundwater Monitoring Well Network:** The groundwater gradient direction at the site appears to vary over 270 degrees, from the west northwest, to the east northeast. An offsite groundwater investigation conducted in December 2011 detected TPH in groundwater in soil borings along 4th Avenue to the southwest of the site but no detections in boring SB-10 placed directly across from the site on East 12th street. Please evaluate the effectiveness of the groundwater monitoring well network and present recommendations in the Interim Remediation Report requested below.
 - a. Please prepare a rose diagram to assist in determining the predominant groundwater direction;
 - b. Please provide graphs indicating groundwater concentrations and groundwater elevations together before and during DPE treatment operation and update with each sampling event;
 - c. Please analyze the influence, if any, of the SVE treatment system operation on the groundwater gradient direction. In all future reports, please include a column on the groundwater monitoring well data tables indicating the status of the treatment system operation, i.e., whether the system was operating during the groundwater sampling events. Please also indicate the status on the *Potentiometric Surface Map* figure.
3. **Sensitive Receptor Survey:** Please perform a Sensitive Receptor Study to determine if sensitive receptors are present within a radius of 1,500 feet of the site by utilizing Alameda County Public Works Agency (ACPWA) and Department of Water Resources (DWR) well data sources for a complete inventory of vicinity water supply wells. ACEH understands that DWR's response is currently delayed, so please utilize ACPWA's data base. ACEH requests the identification and location on a site vicinity figure all active, inactive, standby, decommissioned (sealed with concrete), unrecorded, and abandoned (improperly decommissioned or lost) wells including irrigation, water supply, industrial, dewatering, and cathodic protection wells within a 1,500-foot radius of the site. Please plot the numbered well locations on an aerial photography-based figure and provide a table listing the same numbered well locations, site addresses, well depth and use. Additionally, please identify on the same figure beneficial resources and other sensitive receptors including, but not limited to, surface water bodies, natural resources, schools, hospitals, day care centers, elder care facilities, etc. Please include the sensitive receptor survey in the Interim Remediation Report requested below.
4. **ACPWA Permit Discrepancies and Submittal Of Missing Documents:**
 - a. **Monitoring Well Survey Coordinates:** Please upload the monitoring well survey data for wells MW-1 through MW-6, EW-1 through EW-4 to Geotracker as described under *Locational Data* and *Elevation Data* in Attachment 2, *UST Program, Geotracker Reporting Requirements*. If the survey data does not meet the current Geotracker standards, please

have the six monitoring wells and four extraction wells surveyed by a California–Licensed Land Surveyor and upload the data to Geotracker.

- b. ACPWA Well Permit Discrepancies:** ACEH notes that discrepancies exist between the number of wells installed compared to the number of wells paid for under an ACPWA permit. Specifically, MW-5, MW-6, EW-3 and EW-4 do not appear to be installed under a required ACPWA well permit. In the future, ACEH requests that all soil borings and wells installed at the site be performed under an ACPWA permit. Additionally, please include the accompanying ACPWA well permit when submitting future investigation reports, an industry standard-practice. Please note that ACPWA is included as a cc on this letter.
- i. The ACPWA Well Permit Conditions state that the contractor must complete and submit Department of Water Resources (DWR) Form 188 for all installed wells (groundwater monitoring and extraction) and mail the original to ACPWA within 60 days of installation. Please submit DWR Form 188 to ACEH and ACPWA by the date provided below even if the DWR Form 188 were previously submitted.
 - ii. Please provide a discussion of the apparent name change of wells VW-1 through VW-4 to EW-1 through EW-4 in the Miscellaneous Report requested below. In the future, ACEH requests a brief description and rationale as to the renaming of wells.
- c. Missing Boring Logs:** Please submit the missing boring logs for MW-1 through MW-6, EW-1(or VW-1) through EW-4 (or VW-4), and off-site soil borings SB-10 through SB-21 and their respective ACPWA permits in the Miscellaneous Report requested below. This is an industry standard-practice.

- 5. Assessment Of The Potential Of Vapor Intrusion To Indoor Air:** Due to the elevated concentrations of benzene detected September 18, 2015 in groundwater monitoring wells MW-1, MW-3, MW-5, MW-6, EW-1, EW-2, EW-3, and EW-4 and due to the close proximity of MW-1, MW-3, EW-1 and EW-4 to the residence at the southwest property line, ACEH requests preparation of a work plan to assess potential vapor intrusion to indoor air of the on-site trailer and adjacent residences. Please collect vapor samples with the treatment system both on and off. Please ensure that your sampling strategy is consistent with the field sampling protocols described in the Department of Toxic Substances Control's Final Vapor Intrusion Guidance (October 2011). Consistent with the guidance, ACEH requires installation of permanent vapor wells to assess temporal and seasonal variations in soil gas concentrations. Please include the soil vapor investigation work plan with the Interim Remediation Report requested below.

TECHNICAL REPORT REQUEST

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

- **March 18, 2016** – Geotracker Confirmation submittal of monitoring well survey data
File to be named: RO2931_MISC_R_YYYY-MM-DD
- **March 18, 2016** – Miscellaneous Report
File to be named: RO2931_MISC_R_YYYY-MM-DD
- **March 18, 2016 (Submit Only to ACEH and ACPWA)** – DWR Form 188 for Six Groundwater Monitoring and Four Extraction Wells

- **April 18, 2016** – Interim Remediation and Soil Vapor Investigation Work Plan
File to be named: RO2931_IR_WP_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.

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please send me an e-mail message at karel.detterman@acgov.org or call me at (510) 567-6708.

Karel Detterman, PG
Hazardous Materials Specialist

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

Attachment 2, UST Program, Geotracker Reporting Requirements

Attachment 3, Well Survey Sample Table and Figure

cc: Drew Van Allen, Environmental Compliance Group, LLC (Sent via E-mail to: ecg.ust@gmail.com)
James Yoo, ACPWA (sent via e-mail to jamesy@acpwa.org)
Dilan Roe, ACEH (sent via E-mail to: dilan.roe@acgov.org)
Karel Detterman, ACEH (sent via E-mail to: karel.detterman@acgov.org)
Electronic File, GeoTracker

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

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.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) GeoTracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) 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 registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional 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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- **Signature pages and perjury statements must be included and have either original or electronic signature.**
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Submission Instructions

- 1) Obtain User Name and Password
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to deh.loptoxic@acgov.org
 - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses**, and the **Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to deh.loptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.

ATTACHMENT 2

UST Program - GeoTracker Reporting Requirements

What are the State Water Board electronic data submittal requirements?

The Electronic Reporting Regulations (Chapter 30, Division 3 of Title 23 & Division 3 of Title 27, CCR) require electronic submission of any report or data required by a regulatory agency from a cleanup site. Submission dates are set by a Regional Water Board or by a regulatory agency. Once a report/data is successfully uploaded, as required, you have met the reporting requirement (i.e. the compliance measure for electronic submittals is the actual upload itself). The upload date should be on or prior to the regulatory due date.

What this means:

→ Lab Data:

Analytical data (including geochemical data) for all soil, vapor and water samples that are collected for the purpose of subsurface investigation or remediation are required to be submitted in specified EDF format to a regulatory agency. These data are required to be submitted in electronic format to the State Water Board's Geotracker system via the Internet. Groundwater, soil and vapor samples include: monitor well samples, borehole samples, gas and vapor samples, groundwater grab samples, piezometer samples, stockpile samples and samples from drinking water wells.

→ Boring Logs and Well Screen Intervals:

Boring logs must be prepared by an appropriate registered professional and need to be submitted in PDF format. If a monitor well is installed, the screen depth and interval must be reported.

→ Depth to Water Data:

Monitor wells need to have the depth-to-water information reported in the GEO_WELL file whenever the data is collected, even if the well is not actually sampled during the sampling event. Drinking water wells generally do not need to have the depth to water reported unless they are surveyed as permanent sampling points. A permanent sampling point is defined as a point that is sampled for more than a 30-day period.

→ Locational Data:

If samples from the permanent sampling locations are included in a regulatory report to a regulatory agency as part of a cleanup program, these sampling points must be surveyed. This would typically include any groundwater or similar monitoring points at the site or any drinking water wells that are included in the regulatory report. The surveyed locational information for these sampling points should be submitted using the Geo_XY file. Transient or one-time sampling points (e.g. direct push technologies, piezometers, or grab samples often used for rapid site characterization, stockpile sampling points...) do not need to be surveyed. Permanent influent/effluent sampling locations do need to be surveyed as well. Transient sampling point (a point that is sampled for less than 30 days) are not required to be surveyed.

→ Elevation Data:

Elevation measurements to the top of groundwater well casings are required for all groundwater monitoring wells (to be submitted as part of the GEO_Z file). Drinking water wells included in the report, do not need to have the elevation reported unless they are identified as permanent sampling points.

→ Site Map:

An electronic generalized site plan map is required to be submitted into the State database (GEO_MAP). Site map should display tank locations, streets bordering the facility, and sampling locations for all soil, water and vapor samples. The site map is a stand-alone document that may be submitted in various formats. Additional updated site map may be submitted at any time.

→ Paperless Reporting Requirement:

Starting on January 1, 2005, a complete copy of all clean-up and monitoring reports must be submitted to GeoTracker. This uploaded PDF report may include the signed transmittal letter, professional certification and all data that are uploaded into the GeoTracker.

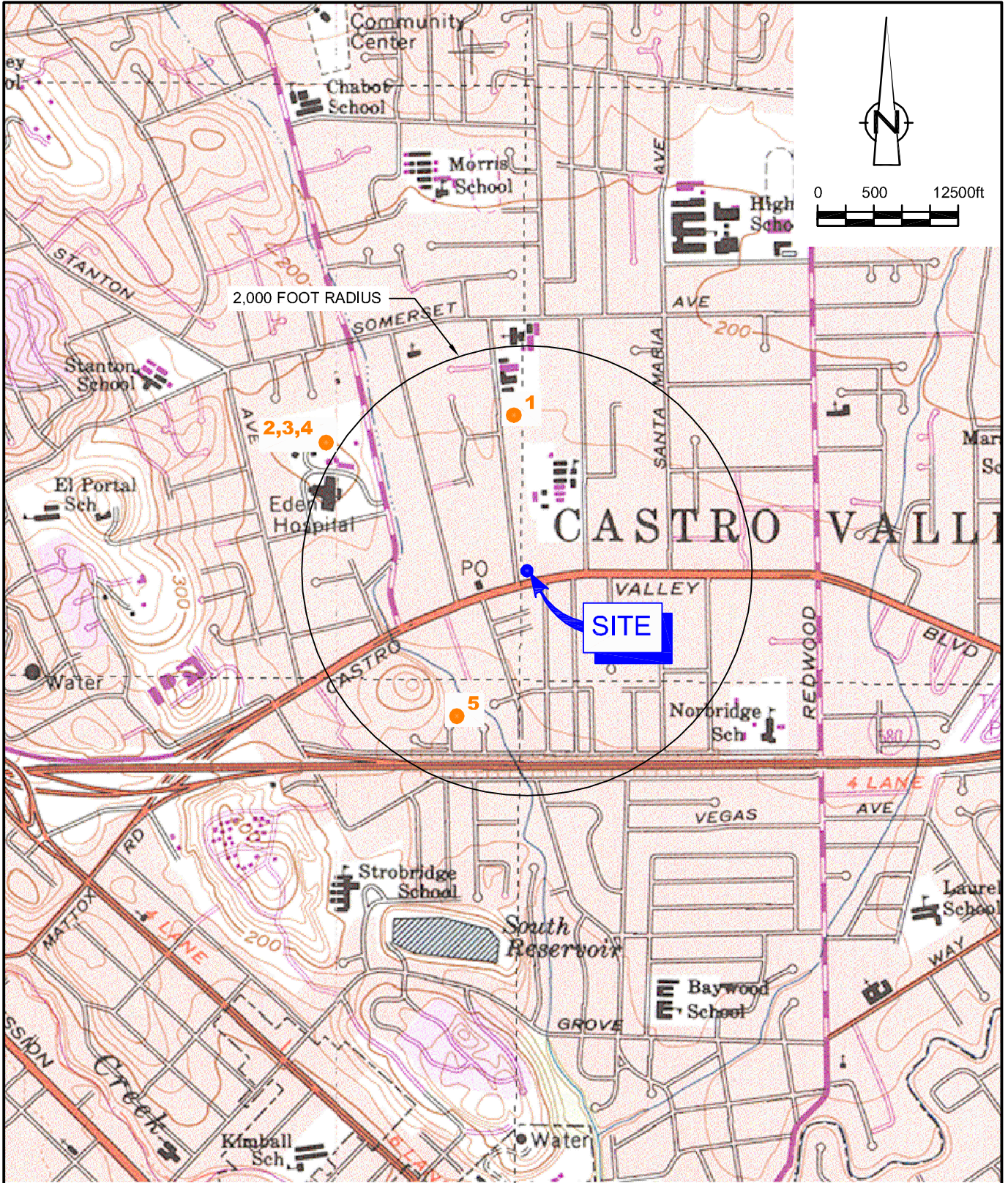
The survey data (latitude/longitude and elevation), depth-to-water, and site map information files must be submitted as required to the SWRCB's GeoTracker database via the Internet in accordance with the [Geotracker XYZ survey Guidelines and Restrictions](#).

(updated 03/28/06)

ATTACHMENT 3

**WELL SURVEY RESULTS
 CHEVRON STATION 9-6991
 2920 CASTRO VALLEY BOULEVARD
 CASTRO VALLEY, CALIFORNIA**

<i>Well No./ Figure ID</i>	<i>Well Owner</i>	<i>Well Address Street</i>	<i>City</i>	<i>Total Well Depth (ft)</i>	<i>Date Installed</i>	<i>Distance/Direction from Site (ft) (approx)</i>	<i>Well Use</i>
1	Private	20036 Anita Avenue Lake Chabot Road	Castro Valley	51	2/19/1953	1,400 N	Domestic
2	Eden Township Hospital	1,000' south of Williams	Castro Valley	150	9/30/1953	2,000 NW	Test well
3	Eden Township Hospital	Eden Township Hospital	Castro Valley	250	9/9/1952	2,000 NW	Domestic
4	Eden Township Hospital	Eden Township Hospital	Castro Valley	60	7/11/1952	2,000 NW	Cooling system return
5	Sam Wallace	Tyee Court	Castro Valley	52	7/3/1953	1,400 S-SW	Domestic



SOURCE: TOPO! MAPS.

LEGEND

- APPROXIMATE WELL LOCATION



WELL SURVEY MAP
CHEVRON SERVICE STATION 9-6991
2920 CASTRO VALLEY BOULEVARD
Castro Valley, California