



May 25, 2018

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

Mr. Waseem Ghani Iqbal (Sent via e-mail to: paki_80@hotmail.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 and Mr. Ghani:

Thank you for participating in the conference call coordinated by Alameda County Department of Environmental Health's (ACDEH) on May 18, 2018. Including yourself, Mike Sgourakis and Drew Van Allen of Environmental Compliance Group, LLC (ECG), your consultant, and ACDEH staff participated in the call. Mr. Waseem Ghani, was unavailable for the call. The purpose of the call was to discuss the April 4, 2018 *Data Gap Investigation Work Plan and Site Conceptual Model (Work Plan)*, prepared and uploaded to Geotracker on April 19, 2018, by ECG on your behalf and the next steps to progress the case to closure. ACDEH understands that the property has not been sold, commercial property usage as a hand wash car wash will continue, and redevelopment is under consideration in the future.

The case does not meet the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) adopted by the SWRCB on May 1, 2012 for the closure of leaking petroleum underground storage tank (UST) sites. ACDEH has determined that the site does not meet the LTCP General Criteria d (Free Product Removal), e (Site Conceptual Model), f (Secondary Source Removal), Media-Specific Criteria for Groundwater, Media-Specific Criteria for Vapor Intrusion to Indoor Air, and the Media-Specific Criteria for Direct Contact.

ACDEH's highest priority is to assess potential vapor intrusion to indoor air of the on-site trailer and adjacent downgradient businesses and residences due to the persistent and elevated benzene concentrations in shallow groundwater at the site, the close proximity of businesses and residential properties, and a variable groundwater gradient direction. ACDEH's second priority is off-site plume definition. The referenced work plan proposes actions with which ACDEH is in general agreement of undertaking; however, in the interest of closing data gaps identified by ACDEH in the May 18, 2018 conference call, ACDEH requests the preparation of the First Work Plan Addendum which addresses the assessment of potential vapor intrusion. Upon presentation of the data collected from the First Work Plan Addendum and updated SCM, ACDEH will decide if preparation of a Second Work Plan Addendum for off-site plume definition will be requested. Please prepare the First Work Plan Addendum, address the following technical comments, and submit by the date indicated below.

TECHNICAL COMMENTS

- 1. Semiannual Groundwater Monitoring and Sampling Report, 1st Half 2018:** Please include hydrographs for all six groundwater wells (MWs) and four extraction wells (EWs) in the 1st Quarter Groundwater Monitoring and Sampling Report as discussed during the conference call. On the hydrographs, please include groundwater elevations; benzene and ethylbenzene concentrations; designation of remediation start and stop dates with a vertical line; and a Rose diagram.

2. First Work Plan Addendum: The Work Plan proposes the installation of three soil gas probes along the southwest property line but as discussed during the call and as shown in the Attachment 2 Figure, ACDEH requests the installation of ten additional soil gas probes. ACDEH requires installation of permanent soil vapor wells to assess temporal and seasonal variations in soil gas concentrations, consistent with California Department of Toxic Substances Control's (DTSC) *Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air* (Vapor Intrusion Guidance) dated October 2011 and DTSC's *Advisory Active Soil Gas Investigations*, July 2015. Please specify the following actions in the Work Plan Addendum.

- a. **Boring Logs:** ACDEH requests submittal of boring logs and soil vapor well construction diagrams for each soil vapor well. On all boring logs, ACDEH requests the following information including, but not limited to, lithologic descriptions using the industry standard United Soil Classification System (USCS), depth to the bottom of the boring, depth to first encountered groundwater and if groundwater is not encountered, please state that information, depths at which soil/groundwater samples were collected, photoionization detector PID reading at all depths, staining, odor, soil color changes.

Please note that any exploratory boring or hole, regardless of depth, must be graphically represented by a boring log, and all boring logs must be included in the soil and groundwater investigation report. Additionally, as a condition of Alameda County Public Works Agency's Permit and PDF's of all borings and monitoring well logs must be uploaded to Geotracker as "Geo Bores".

- b. **Soil Samples Analytes:** Please collect soil samples within the 0 to 5 foot depth interval, at the groundwater interface, lithologic changes, and in areas of obvious impact. Please analyze all soil samples for Total Petroleum Hydrocarbons as gasoline (TPHg), TPH as Diesel (TPHd), naphthalene, benzene, toluene, ethylbenzene, and xylenes (BTEX), Methyl tert-butyl ether (MTBE), and fuel oxygenates by EPA 8260.
- c. **Soil Vapor Analytes:** In addition to the proposed soil vapor analytes, ADCEH requests laboratory analysis of all soil vapor samples for the fixed gases methane, carbon dioxide, and oxygen using ASTM D1946. Please include those concentrations as a percentage on the summary tables for reference in the investigation report.
- d. **Standard Operating and Safety and Loss Control Procedures (SOPs):** The SOP proposes using isobutylene 100 parts per million (ppm) as a tracer for soil vapor samples; however, ACDEH requests use of helium and requests a detailed description of qualitative leak testing during soil vapor sample collection. Appendix C, *Quantitative Leak Testing using a Tracer Gas* in DTSC's *Advisory- Active Soil Gas Investigations* dated July 2015 suggests using a shroud with a gaseous tracer to monitor for system leaks. The purpose of this leak check method is to provide a quantifiable means of evaluating the data quality effects of ambient air intrusion into the soil gas sample. ACDEH requests the following:

- i. The encapsulating shroud should entirely encompass the sample apparatus and surface completion of the soil vapor well or vapor pin;
- ii. Maintain a minimum of 20% helium atmosphere within the encapsulating shroud throughout the duration of purging and sampling;
- iii. Monitoring, recording, and reporting of shroud helium concentrations in field logs to be included in the appendix of the report. Helium monitoring may be conducted using a field meter as long as the detector is capable of reporting Helium detections between 100% and 0.1% with a precision of at least +10% at 0.1%.

3. Geotracker Electronic Submittal of Information (ESI) Compliance: Please be aware that failure to comply with Geotracker requirements will jeopardize reimbursement from the USTCF and will delay eventual case closure.

TECHNICAL REPORT REQUEST

Please upload technical reports to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **June 8, 2018:** GeoTracker electronic submittal date for all missing ESI submittals
- **June 8, 2018:** Semiannual Groundwater Monitoring and Sampling Report, 1st Half 2018
File to be named: RO2931_GWM_R_yyyy-mm-dd
- **June 27, 2018:** First Work Plan Addendum and Site Conceptual Model
File to be named: RO2931_WP_SCM_ADEND_R_yyyy-mm-dd
- **November 30, 2018:** Semiannual Groundwater Monitoring and Sampling Report, 2nd Half 2018
File to be named: RO2931_GWM_R_yyyy-mm-dd
- **May 31, 2019:** Semiannual Groundwater Monitoring and Sampling Report, 1st Half 2019
File to be named: RO2931_GWM_R_yyyy-mm-dd
- **November 30, 2019:** Semiannual Groundwater Monitoring and Sampling Report, 2nd Half 2019
File to be named: RO2931_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.

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.

Mr. Ghafoor
RO0002931
May 25, 2018
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Sincerely,

Karel Detterman, PG
Senior Hazardous Materials Specialist

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

Attachment 2 - Figure

cc: Drew Van Allen, Environmental Compliance Group, LLC, 270 Vintage Drive, Turlock, CA 95382
(Sent via E-mail to: ecg.ust@gmail.com)

Michael Sgourakis, Environmental Compliance Group, LLC, 270 Vintage Drive, Turlock, CA 95382
(Sent via E-mail to: mr.e.meat@hotmail.com)

Dilan Roe, ACDEH, (Sent via E-mail to: dilan.roe@acgov.org)
Karel Detterman, ACDEH, (Sent via E-mail to: karel.detterman@acgov.org)
Paresh Khatri, ACDEH, (Sent via E-mail to: paresh.khatri@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.

ATTACHMENT 2

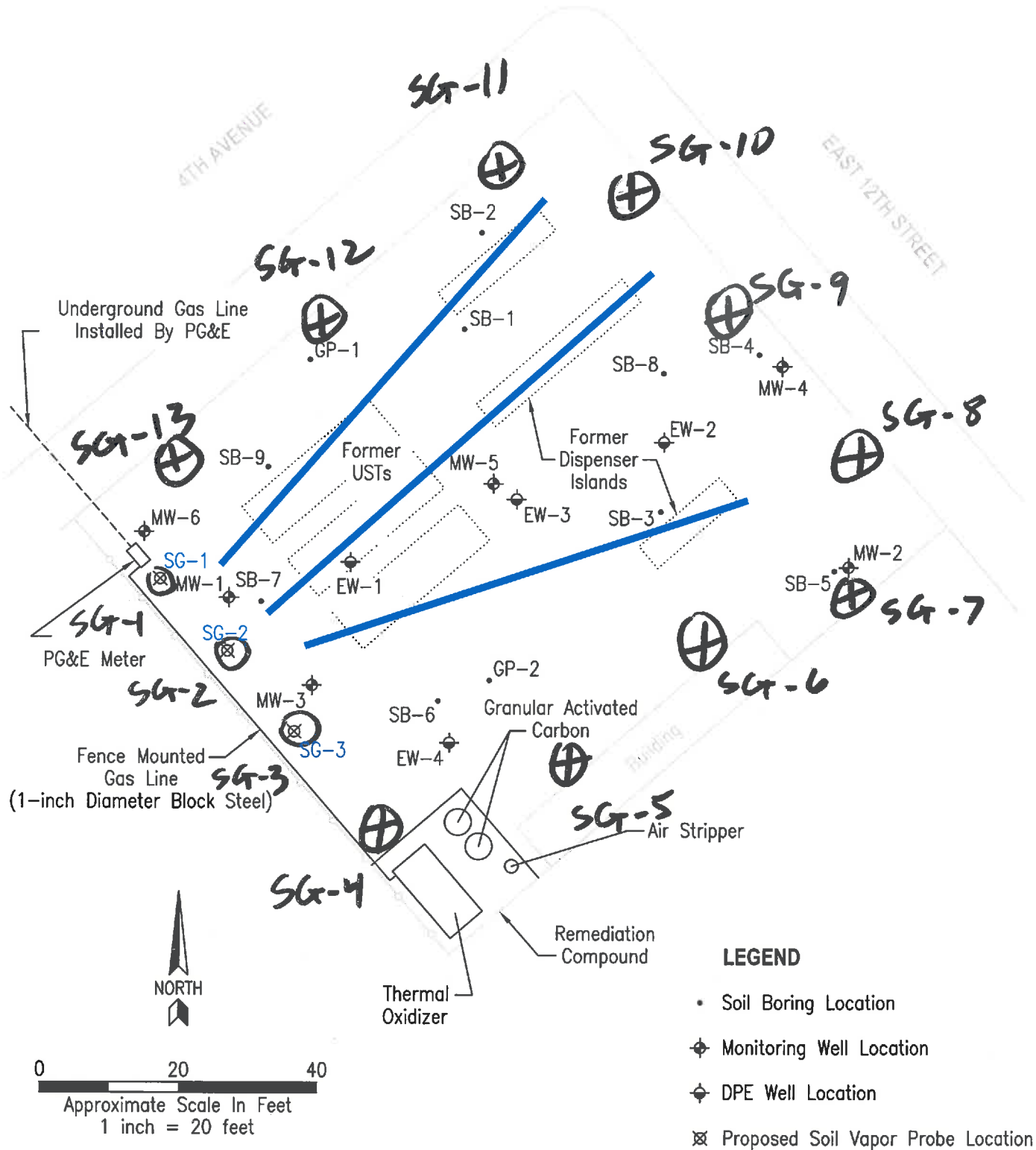


FIGURE 5

Project Number:
GHA.19009

Date:
February 28, 2018

**PROPOSED TEST PITS AND SOIL VAPOR
PROBE LOCATION MAP**

Shore Acre Gas
403 East 12th Street
Oakland, California



**Environmental
Compliance
Group, LLC**

270 Vintage Drive, Turlock, CA 95382
Phone: (209) 664-1035