

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



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May 4, 2007

Mr. Glenn Logan  
6200 Shattuck Ave.  
Oakland, CA 94609

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

Dear Mr. Logan:

Subject: Fuel Leak Case RO0002935 & Global ID T0619748201, Automasters, 6200 Shattuck Ave., Oakland, CA 94609

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the subject site including the August 7, 2006 Soil and Groundwater Investigation Report by Pangea Environmental Services (Pangea). This report provides the results of soil and groundwater sampling at the referenced site attempting to determine if releases had occurred from the two former underground tanks and/or the tank system. Although the tanks were removed from the site in 1986, no report was found documenting what was done and what sample results might have been. Impacted soil reportedly was removed from between the tanks and samples collected and analyzed. Pangea drilled three borings at selected locations, near the former USTs and dispensers and to the north of the USTs. Soil samples were collected from each boring and groundwater was collected from SB-2. Petroleum contamination up to 3,000 parts per million (ppm) Total Petroleum Hydrocarbons as gasoline (TPHg) and 850 ppm Total Petroleum Hydrocarbons as diesel (TPHd) was detected in the soil and up to 1,700 parts per billion (ppb) TPHg, 1,000 ppb TPHd and 1,200 ppb TPH as motor oil was detected in the groundwater sample from this boring. Based upon these results, a petroleum release to soil and groundwater has occurred at the site and additional investigation will be required. We request that you address the following technical comments and submit the technical reports requested below.

#### TECHNICAL COMMENTS

1. Conduit Study- The purpose of the conduit study is to locate potential migration pathways and potential conduits and determine the probability of the plume encountering preferential pathways and conduits that could spread the contamination. Of particular concern is the identification of abandoned wells and improperly-destroyed wells that can act as conduits to deeper water bearing zones.

We request that you perform a conduit study that details the potential migration pathways and potential conduits (utilities, storm drains, etc.) that may be present in the vicinity of the site. Provide a map showing the location and depth of all utility lines and trenches including sewers and storm drains within and near the plume area.

The conduit study shall include a detailed well survey of all wells (monitoring and production wells: active, inactive, standby, destroyed (sealed with concrete), abandoned (improperly destroyed); and dewatering, drainage, and cathodic

protection wells) within a ¼ mile radius of the subject site. As part of your detailed well survey, please perform a background study of the historical land uses of the site and properties in the vicinity of the site. Use the results of your background study to determine the existence of unrecorded/unknown (abandoned) wells, such as old deep agricultural wells, that can act as pathways for migration of contamination at and/or from your site. Please review historical maps such as Sanborn maps, aerial photos, etc., when performing the background study. Provide a map(s) showing the location of all wells identified in your study, use data tables to report the data collected as part of your survey, and include prints of historic aerial photos used as part of your study.

Using the results of your conduit study and data from previous investigations at the site you are to develop the initial three-dimensional conceptual model of site conditions. You are to use this initial conceptual model to determine the appropriate configuration for sampling points in the Soil and Water Investigation phase of work at this site propose these in the work plan. Discuss your analysis and interpretation of the results of the conduit study (including the detailed well survey) and report your results in the Work Plan. Describe your initial conceptual model of site conditions and explain your rationale for the configuration of sampling points in the work plan requested below.

## 2. Request for Other Technical Reports

We request that you provide any and all previous reports for this site including tank removal reports, analytical reports and Phase I reports. Please describe the past site use and include as necessary Sanborn maps, aerial photos or site maps. Please verify the location of the former USTs, piping run and dispensers.

## 3. Contaminant Source Characterization

The purpose of contaminant source characterization is to determine the nature and extent of free product (liquid phase), petroleum saturated soils (residual phase), and hydrocarbons dissolved in groundwater (aqueous phase), and high concentrations of soil vapor (vapor phase) that will continue to increase the concentration and mass of the dissolved phase contaminant plume. Contaminant source characterization also includes characterization of dissolved phase contamination and an estimation of contaminant mass in the source area. Since no tank removal report has been provided, additional soil borings and soil and groundwater sampling should be done to better characterize the potential source areas at the site ie from the other ends of the former USTs , near dispensers and down-gradient as necessary. Please provide your proposal for source characterization in the work plan requested below.

## TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health according to the following schedule:

- June 8, 2007- Conduit Study Report, any other technical reports and Work Plan for Contaminant Source Characterization

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) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy 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 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, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

#### 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

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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

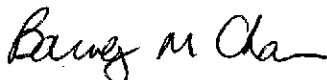
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

#### 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.

If you have any questions, please call me at (510) 567-6765.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: files, D. Drogos

Mr. Bob Clark-Riddell, Pangea Environmental, 1710 Franklin St., Ste. 200, Oakland,  
CA 94612

Mr. Richard Heintz, 2019 Emerson St., Berkeley, CA 94703

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