ALAMEDA COUNTY
**HEALTH CARE SERVICE AGENCY**
REBECCA GEBHART, Acting Agency Director

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

June 15, 2016

Glen D. Logan Trust
Automasters
6200 Shattuck Avenue
Oakland, CA 94609-1237

Ali R. Khashabi
c/o Dorothy Elder
4 Garden Estates Court
Alamo, CA 94507-1129

6200 Shattuck Partnership, LLC
15 Mulberry Court No. 15
Belmont, CA 94002
Sent by e-mail to:
johnnywgroup@gmail.com

Subject: Technical Report Request for Fuel Leak Case RO0002935 and GeoTracker Global ID T0619748201 Automasters, 6200 Shattuck Avenue, Oakland, CA 94609-1237

Ladies and Gentlemen:

Thank you for attending the meeting held at Alameda County Department of Environmental Health's (ACDEH) offices on June 9, 2016. The purpose of the meeting was to identify the next steps to simultaneously progress the case to closure and facilitate site redevelopment. We also reviewed the data presented in the *Remedial Investigation Report and Updated Site Conceptual Model* (Report) dated March 14, 2016 prepared by West Associates Environmental Engineers, Inc. (West) on behalf of 6200 Shattuck Partnership, LLC. Thank you for submitting the Report. We understand that an auto repair shop is in current operation on the east side of the property and will continue operation after redevelopment. The western portion will be redeveloped with two buildings: a commercial-only building at the corner of Shattuck and 62nd Street and a mixed use residential/commercial building along Shattuck Avenue.

According to the case file, in 1986, two former underground storage tanks (USTs) were removed from the site; however, there appears to be no documentation from the UST removal. The two former USTs and dispenser island were presumably located in the south and southwest portion of the site. The Report describes the installation of three groundwater monitoring wells MW-101, MW-102, and MW-103), three direct push bores (DP-1, DP-2, and DP-3), and seven soil borings (B1 through B-7). The three wells were monitored and sampled in December 2015, and monitored in February 2016.

ACDEH has evaluated the data and recommendations presented in the Report in conjunction with the case files, and the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on ACDEH staff review, we have determined that the site does not meet the LTCP General Criteria d (Free Product), e (Site Conceptual Model [SCM]), 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. Please refer to ACDEH's November 24, 2014 Directive Letter for the details on the LTCP analysis.

ACDEH requests preparation of a Data Gap Work Plan that is supported by an updated SCM to address the identified data gaps discussed during our meeting and described in this Directive Letter.

**TECHNICAL COMMENTS**

1. **General Criteria c (Primary Release)** – The LTCP requires that the tank, pipe, or other appurtenant structure that released petroleum into the environment (i.e., the primary source) has been removed, repaired, or replaced. It is not the intent of the policy to allow sites with ongoing leaks from the UST system to qualify for closure.

   ACDEH's review of the case files indicates that due to the lack of documentation regarding the UST removal, the presumed locations of the former USTs, dispenser island, and fuel piping is approximate and we understand that there are no obvious UST/fuel line marks or indications on the existing pavement. Please present a strategy in the Data Gap Work Plan requested below to conduct a geophysical survey to close this data gap and provide a better understanding of where the USTs, dispenser island, and fuel lines had been located.

2. **LTCP General Criteria d (Free Product) –** The LTCP requires free product to be removed to the extent practicable at release sites where investigations indicate the presence of free product by removing in a manner that minimizes the spread of the unauthorized release into previously uncontaminated zones by using recovery and disposal techniques appropriate to the hydrogeologic conditions at the site, and that properly treats, discharges, or disposes of recovery byproducts in compliance with applicable laws. Additionally, the LTCP requires that abatement of free product migration be used as a minimum objective for the design of any free product removal system.

   The LTCP's *Technical Justification for Vapor Intrusion (VI) Media Specific Criteria* provides both direct and indirect evidence in soil and groundwater for the presence of light non-aqueous phase liquid (LNAPL) (aka "free product"). ACDEH's review of the case files indicates the possible presence of free product in the south and southwest corner of the site. Elevated soil concentrations of Total Petroleum Hydrocarbons as gasoline (TPHg) were detected at 3,100 milligrams per kilogram (mg/kg) and 770 mg/kg both at 10 feet below ground surface (bgs) in MW101 and MW103, respectively, and 3,000 mg/kg in SB-2 at 11 feet, may indicate the existence of another UST and/or fuel piping. Depth to groundwater ranged from 3.6 to 4.8 feet bgs in the three monitoring wells which may indicate the absence of a bioattenuation zone and benzene concentrations of 1,000 micrograms per liter (ug/L) and 18,000 ug/L TPHg were detected in the groundwater sample from MW103 located downgradient from the presumed location of the western former UST and dispenser island. Please present a strategy to assess the presence of free product and characterize the presumed eastern UST location in the Data Gap Work Plan requested below. As discussed during our meeting, a possible strategy might include an east – west oriented soil boring transect comprised of a soil boring on either side of each presumed UST location and the former dispenser island.

3. **LTCP General Criteria e (Site Conceptual Model) –** According to the LTCP, the SCM is a fundamental element of a comprehensive site investigation. The SCM establishes the source and attributes of the unauthorized release, describes all affected media (including soil, groundwater, and soil vapor as appropriate), describes local geology, hydrogeology and other physical site characteristics that affect contaminant environmental transport and fate, and identifies all confirmed and potential contaminant receptors (including water supply wells, surface water

bodies, structures and their inhabitants). The SCM is relied upon by practitioners as a guide for investigative design and data collection. All relevant site characteristics identified by the SCM shall be assessed and supported by data so that the nature, extent and mobility of the release have been established to determine conformance with applicable criteria in this policy.
As a part of updating the SCM, please identify on an aerial photograph-based figure the beneficial resources and other sensitive receptors including, but not limited to, groundwater classification, wetlands, surface water bodies, natural resources, schools, hospitals, day care centers, elder care facilities, etc. Please plot the numbered well locations on an aerial photography-based figure and provide a table listing the same numbered well locations and information similar to the example provided in Attachment 2, *Well & Sensitive Receptor Survey.* On a separate figure, please show the rose diagram and locations of houses and buildings that have basements, half-basements, or potential dewatering structures (such as sump pumps) as shown in the Figure 2, *Site Plan Chevron Service Station 90076 4265 Foothill Blvd., Oakland, CA* provided in Attachment 2. These structures have the potential to bring contaminated groundwater to the surface for discharge to the street or storm drain. Please indicate the depths of the underground utilities shown on the Report's Figure 6.

4. **General Criteria f – Secondary Source Has Been Removed to the Extent Practicable –** "Secondary source" is defined as petroleum-impacted soil or groundwater located at or immediately beneath the point of release from the primary source. Unless site attributes prevent secondary source removal (e.g. physical or infrastructural constraints exist whose removal or relocation would be technically or economically infeasible), petroleum-release sites are required to undergo secondary source removal to the extent practicable as described in the policy. "To the extent practicable" means implementing a cost-effective corrective action which removes or destroys-in-place the most readily recoverable fraction of source-area mass. It is expected that most secondary mass removal efforts will be completed in one year or less. Following removal or destruction of the secondary source, additional removal or active remedial actions shall not be required by regulatory agencies unless (1) necessary to abate a demonstrated threat to human health or (2) the groundwater plume does not meet the definition of low threat as described in this policy.

   ACDEH's review of the case files indicates that insufficient data and analysis has been presented to assess compliance with General Criteria f. It appears that the tank pit could present a continuing source of petroleum hydrocarbons due to commonly accepted pre-1990's tank removal methods. In general, tanks were removed, followed by little or no sidewall soil removal, lining of the tank pit with plastic and subsequent backfilling of the tank pit with or without treatment of the removed soil, which provides a continuing secondary contaminant source. Please refer to Technical Comment 1 and present a strategy to address the potential presence of secondary source in the Data Gap Work Plan requested below.

5. **LTCP Media Specific Criteria for Groundwater –** To satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites listed in the policy.

   Our review of the case files indicates that on- and off-site groundwater quality has not been adequately delineated. Based on a single groundwater monitoring event on December 31, 2015, benzene was detected in well MW-103 at 1,000 ug/L and TPHg at 18,000 ug/L. Additionally, the

presumed eastern UST location is uninvestigated in comparison to the western UST location. The elevated benzene in groundwater coupled with the lack soil and groundwater delineation indicates a critical data gap. Please present a strategy in the Data Gap Work Plan requested below to determine the source of the benzene and the on- and off-site impacted extent. As discussed during our meeting, installation of a temporary well to the south of the uninvestigated eastern UST is a possible strategy.

Please commence with quarterly groundwater monitoring and sampling under the schedule provided below. Please provide and update a rose diagram for each quarterly monitoring and sampling event in the *Quarterly Groundwater Monitoring and Sampling Reports* requested below.

6. **LTCP Media Specific Criteria for Vapor Intrusion to Indoor Air –** The LTCP describes conditions, including bioattenuation (unsaturated) zones, which if met will assure that exposure to petroleum vapors in indoor air will not pose unacceptable health risks to human occupants of existing or future site buildings, and adjacent parcels. Appendices 1 through 4 of the LTCP criteria illustrate four potential exposure scenarios and describe characteristics and criteria associated with each scenario.

   As previously discussed in Technical Comment 2, an elevated benzene concentration of 1,000 ug/L and 18,000 ug/L TPHg detected in groundwater samples from MW103 and depth to groundwater ranged from 3.6 to 4.8 feet bgs in the three monitoring wells may indicate the possible presence of free product coupled with the absence of a bioattenuation zone as discussed in the *Technical Justification for Vapor Intrusion (VI) Media Specific Criteria* for the LTCP. Please present a strategy in the Data Gap Work Plan to address the data gaps identified above.

7. **LTCP Media Specific Criteria for Direct Contact and Outdoor Air Criteria** – The LTCP describes conditions where direct contact with contaminated soil or inhalation of contaminants volatized to outdoor air poses a low threat to human health. According to the policy, release sites where human exposure may occur satisfy the media-specific criteria for direct contact and outdoor air exposure and shall be considered low-threat if the maximum concentrations of petroleum constituents in soil are less than or equal to those listed in Table 1 for the specified depth bgs. Alternatively, the policy allows for a site specific risk assessment that demonstrates that maximum concentrations of petroleum constituents in soil will have no significant risk of adversely affecting human health, or controlling exposure through the use of mitigation measures, or institutional or engineering controls.

   Three “Oil Storage” and “Waste Oil Storage” vessels are indicated on Figure 3, Site Layout Map. Soil samples analyzed from borings B-1, B-2 or B-7 did not include the requested semi-volatile organic compounds (SVOCs) by EPA Method 8270 hydrocarbons (PAHs) by 8270-Selected Ion Monitoring (SIM). Please present a strategy in the Data Gap Work Plan requested below to collect sufficient data from borings placed adjacent to B-1, B-2, and B-7 to satisfy the LTCP direct contact and outdoor air exposure criteria. Sample and analyze soil within the 0 to 5 and 5 to 10 foot intervals, at the groundwater interface, lithologic changes, and at areas of obvious impact (such as staining, odor, Photoionization Detector (PID) readings, soil color changes) for PAH, TPHg, Total Petroleum Hydrocarbons as Diesel (TPHd), Total Petroleum Hydrocarbons as Motor Oil (TPHmo), benzene, toluene, ethylbenzene, and xylenes (BTEX), methyl tert-butyl ether (MTBE), naphthalene, fuel oxygenates by EPA 8260, and the five wear metals.

**8.** **Data Gap Investigation Work Plan and Site Conceptual Model –** Please prepare Data Gap Investigation Work Plan to address the technical comments listed above.

a. Please include a site map based on historical aerial photographs indicating the location of the former USTs and the extent of the excavation, any previous excavations, and all UST system appurtenances by the date specified below. Please include in all future reports an extended site map using an aerial photographic base map to depict both the site and immediate vicinity to facilitate understanding the site and surrounding vicinity use (commercial or residential).

b. Please consolidate soil and groundwater data in separate tables including data collected during previous investigations. Please include collection dates and depths and report the actual detection limits for all Non-Detected (ND) results. Do not use "ND" in the summary tables.

c. Boring Logs: The boring logs for borings B-1, B-2, B-3, B-4, B-5, B-6, and B-7 were not included in the Report. Please forward the seven boring logs with the work plan requested below. 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".

Please submit all future boring logs to ACDEH and Geotracker. Please refer to Pangea's boring log as an example and please provide a boring log legend. On all boring logs, please provide 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, PID reading at all depths, staining, odor, soil color changes.

**TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACDEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's GeoTracker website according to Attachment 1 by the following schedule and file-naming convention:

- **July 30, 2016** – Second Quarter 2016 Groundwater Monitoring and Sampling Report
  File to be named: RO2935_GWM_R_yyyy-mm-dd

- **August 18, 2016** – Data Gap Investigation Work Plan and Updated Site Conceptual Model
  File to be named: RO2935_WP_ADEND_SCM_R_yyyy-mm-dd

- **October 30, 2016** – Third Quarter 2016 Groundwater Monitoring and Sampling Report
  File to be named: RO2935_GWM_R_yyyy-mm-dd

- **January 30, 2017** – Fourth Quarter 2016 Groundwater Monitoring and Sampling Report

File to be named: RO2935_GWM_R_yyyy-mm-dd

- **April 30, 2017** – First Quarter 2017 Groundwater Monitoring and Sampling Report
  File to be named: RO2935_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.

Online case files are available for review at the following website: http://www.acgov.org/aceh/index.htm.

Thank you for your cooperation. If your email address does not appear on the cover page of this notification, ACDEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case. 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.

Sincerely,

Karel Detterman

Digitally signed by Karel Detterman
DN: cn=Karel Detterman, o, ou, email=karel.detterman@acgov.org, c=US
Date: 2016.06.16 11:43:35 -07'00'

Karel Detterman, PG
Hazardous Materials Specialist

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

Attachment 2 – *Well & Sensitive Receptor Survey* and Figure 2, *Site Plan Chevron Service Station 90076*

cc: Bruce Jacobsen, West & Associates, PO Box 5891, Vacaville, CA 95696 (Sent via E-mail to: bjacobsen@astound.net)
Dilan Roe, ACDEH (Sent via E-mail to: dilan.roe@acgov.org)
Karel Detterman, ACDEH (Sent via E-mail to: karel.detterman@acgov.org)
GeoTracker, Electronic Case File

**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)

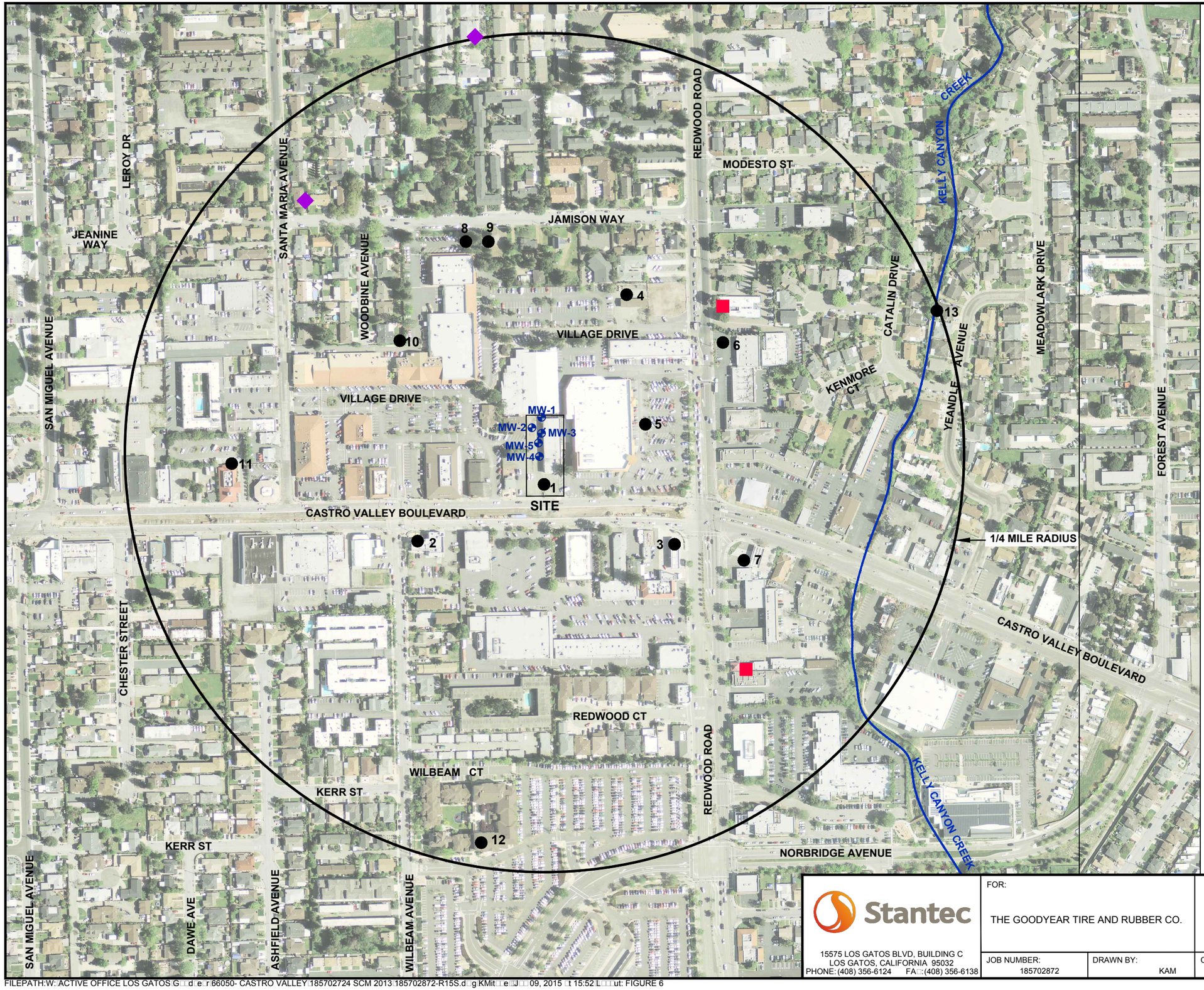
**Submission Instructions**

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




**LEGEND:**

- PROPERTIES WITH WELLS WITHIN 1/4-MILE OF SITE
- MEDICAL OFFICES WITHIN 1/4-MILE OF SITE
- SCHOOLS WITHIN 1/4-MILE OF SITE
- ACTIVE GROUNDWATER MONITORING WELL LOCATION
- DESTROYED GROUNDWATER MONITORING WELL LOCATION


Stantec
15575 LOS GATOS BLVD, BUILDING C
LOS GATOS, CALIFORNIA 95032
PHONE: (408) 356-6124 FAX: (408) 356-6138


FOR: THE GOODYEAR TIRE AND RUBBER CO.

**WELL & SENSITIVE RECEPTOR SURVEY**
**GOODYEAR DEX #9578**
**3430 CASTRO VALLEY BOULEVARD**
**CASTRO VALLEY, CALIFORNIA**

FIGURE: 6

| JOB NUMBER: | DRAWN BY: | CHECKED BY: | APPROVED BY: | DATE: |
|---|---|---|---|---|
| 185702872 | KAM | KM | GM | 01/08/15 |

FILEPATH:W: ACTIVE OFFICE LOS GATOS G□□d□e□r 66050- CASTRO VALLEY□185702724 SCM 2013□185702872-R15S.d□g KMit□□e□J□□09, 2015 □t 15:52 L□□□ut: FIGURE 6

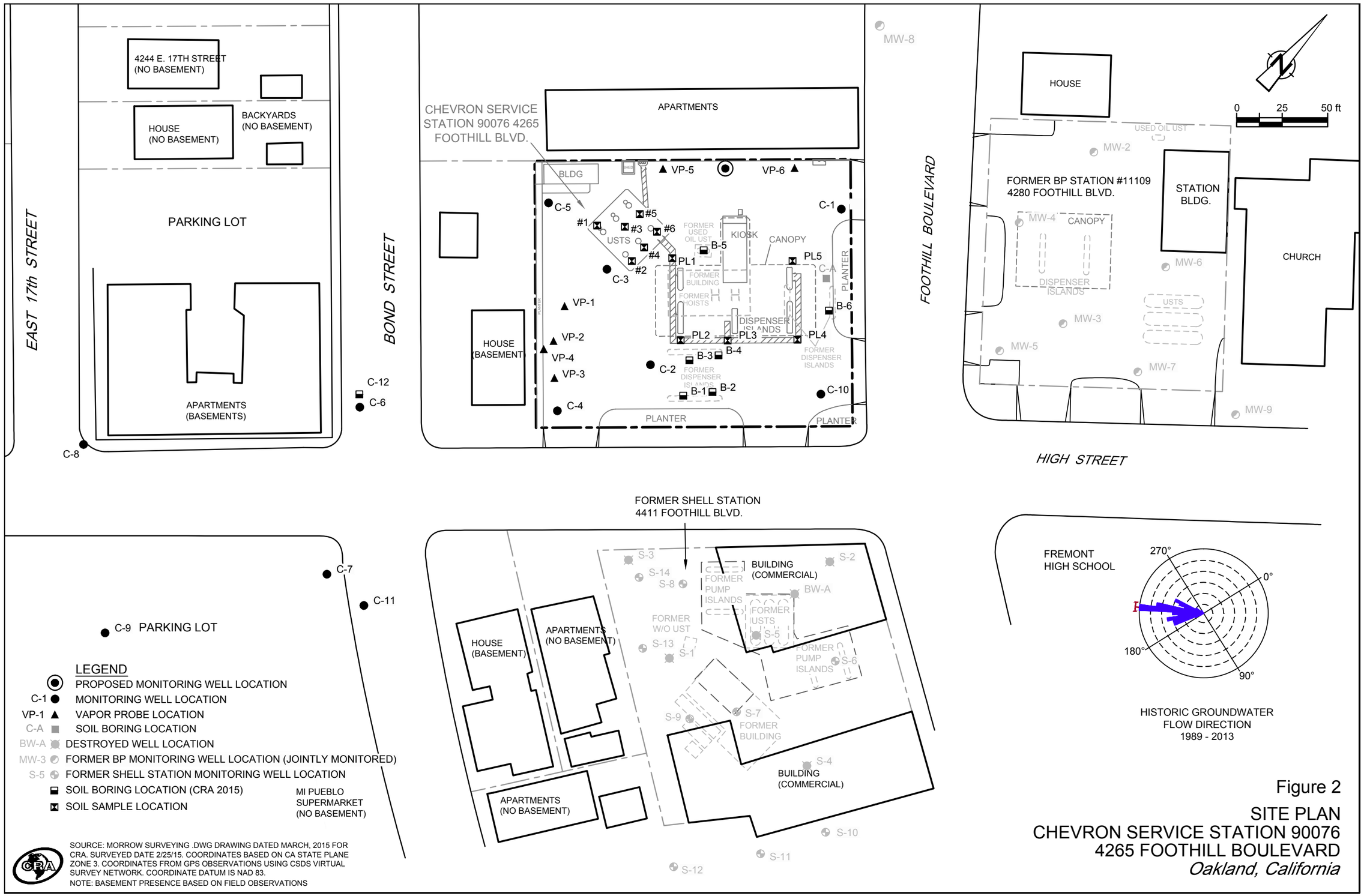



Figure 2

SITE PLAN
CHEVRON SERVICE STATION 90076
4265 FOOTHILL BOULEVARD
*Oakland, California*

311977-2014(018)GN-SO002 MAR 31/2015