



October 2, 2018

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: Fuel Leak Case RO0002935 and GeoTracker Global ID T0619748201 Automasters,
6200 Shattuck Avenue, Oakland, CA 94609-1237; Expedited Claim Account Pilot
Program (ECAP): UST Claim #20265

Ladies and Gentlemen:

Thank you for participating on the first Joint Execution Team (JET) conference call held on July 27, 2018 to discuss ACDEH and USTCF staff review of the State Water Resources Control Board's Low Threat Closure Policy (LTCP) criteria, and identify additional data collection and assessment required to advance the case to closure. The *Work Plan for Soil Vapor Survey and Offsite Data Gap Investigation* (Work Plan) prepared by West Associates Environmental Engineers, Inc. (West) on behalf of 6200 Shattuck Partnership, LLC and submitted May 11, 2018 was discussed during the JET call.

Currently, the property is in use as an auto repair shop. ACDEH understands that the new property owner, 6200 Shattuck Partnership, LLC, has conceptual plans to redevelop the property; however, the planning process has not yet commenced with the City of Oakland Planning Department. Consequently, ACDEH will continue to evaluate site data under 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 e (Site Conceptual Model) or Media-Specific Criteria for Groundwater, both because the groundwater plume is undefined downgradient. The Media-Specific Criteria for Vapor Intrusion to Indoor Air Criteria is met because the current property use as an auto repair facility does not appear to pose an indoor air vapor intrusion risk to onsite buildings. Offsite vapor intrusion risk is unknown, pending downgradient plume delineation. The Media-Specific Criteria for Direct Contact and Outdoor Air Exposure Criteria is met. Based on ACDEH staff review of the case file and the referenced report ACDEH requests that you address the following technical comments and send us the document requested below.

Total petroleum hydrocarbon as motor oil (TPHmo) was detected at 5,200 micrograms per liter (ug/L) in MW-101 in July 2017, an increase from less than 250 ug/L from the previous five events December 2015 to March 2017, which may indicate a surface release associated with poor housekeeping. A Site Cleanup Program (SCP) case, unrelated to this underground storage tank (UST) case, may be opened regarding suspected surface contamination associated with poor housekeeping.

TECHNICAL COMMENTS

Request for a Work Plan Addendum – The referenced work plan proposes a series of actions with which ACDEH is in general agreement; however, ACDEH first requests submittal of a brief Work Plan Addendum,

for approval that will address the agreed-upon items in the JET call. The Work Plan Addendum will consist of:

- A revised figure with the agreed-upon locations of the two new groundwater monitoring wells;
 - Standard Operating Procedures for groundwater monitoring well installation;
 - Proposed soil and groundwater laboratory analyses.
1. **Proposed soil vapor probe installation and sampling:** It is not necessary at this time to install the five proposed on-site soil vapor probes because the Media-Specific Criteria for Vapor Intrusion to Indoor Air Criteria is met by current property use.
 2. **Request for installation of two off-site groundwater monitoring wells:** The Work Plan included a proposal to install three off-site borings southwest, downgradient, and on the west side of Shattuck Avenue. Based on discussions during the JET conference call, it was agreed that installation of two groundwater monitoring wells and inclusion of the wells into the semiannual groundwater monitoring and sampling program would be instrumental in defining the downgradient groundwater plume and the potential for offsite vapor intrusion risk to residences on the west side of Shattuck Avenue and at the corner of 61st Street and Shattuck Avenue.

The lack of adequate detail on boring logs continues to impair data analysis as shown by the boring logs for B-27 through B-20. ACDEH requests inclusion of the following information on all boring logs: depth to first encountered groundwater and depth to stabilized groundwater, lithologic descriptions using the industry standard United Soil Classification System (USCS), depth to the bottom of the boring, and a statement if groundwater is not encountered, a boring log legend, depths at which soil/groundwater samples were collected, PID reading at all depths, staining, odor, soil color changes, and indication of fill such as plastic bits, brick, etc. Boring logs for all soil borings, regardless of depth, must be uploaded to Geotracker.

TECHNICAL REPORT REQUEST

Please upload the technical reports to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule and please send an e-mail with the document to karel.detterman@acgov.org:

- **October 8, 2018** - Work Plan Addendum submitted by e-mail
File to be named: RO2935_WP_ADEND_R_YYYY-MM-DD
- **November 30, 2018** –2nd Half Semi Annual 2018 Groundwater Monitoring & Sampling Report
File to be named: RO2935_GWM_R_YYYY-MM-DD
- **May 30, 2019** –1st Half Semi Annual 2019 Groundwater Monitoring & Sampling Report
File to be named: RO2935_WP_ADEND_SCM_R_YYYY-MM-DD
- **November 30, 2019** – (Tent.) 2nd Half Semi Annual Groundwater Monitoring & Sampling Report
File to be named: RO2935_GWM_R_YYYY-MM-DD
- **May 30, 2020** – (Tent.) 1st Half Semi Annual Groundwater Monitoring & 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

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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. 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, PG
Senior Hazardous Materials Specialist

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

cc: Bruce Jacobsen, West & Associates, P.O. 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)

Paresh Khatri, ACDEH (Sent via E-mail to pariah.khatri@acgov.org)

GeoTracker, Electronic Case File

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.