

From: Roe, Dilan, Env. Health
To: ["Morgan Johnson"](#)
Cc: [Weston, Robert, Env. Health](#); ["terri.costello"](#); ["Avery.Patton@amec.com"](#); [Shawn Munger](#); ["Susan.Gallardo@amec.com"](#); ["Marshall Torre"](#)
Subject: RE: Revised Permit Application - Crown Chevrolet UST Removal , Fuel Leak Case #RO0003014
Date: Friday, October 05, 2012 4:26:00 PM
Attachments: [UST Removal Permit Application Comments 2012-10-5.docx](#)
[image001.png](#)

Morgan:

Please find the attached file with my review comments on the Underground Storage Tank Removal Application as it pertains to the open Fuel Leak Case #RO0003014. These comments are separate and in addition to the comments provide by Rob Weston.

Regards

Dilan Roe, P.E.

Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
510.567.6767; Ext. 36767
QIC: 30440
dilan.roe@acgov.org

PDF copies of case files can be reviewed/downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>

From: Weston, Robert, Env. Health
Sent: Friday, October 05, 2012 2:44 PM
To: 'Morgan Johnson'; Roe, Dilan, Env. Health
Subject: RE: Revised Permit Application - Crown Chevrolet UST Removal

Dilan has a part of the plan to review for completeness. Unknown if we will be finished today.

Robert Weston
Sr. Hazardous Materials Specialist
ICC 5238670-UI
Alameda County Department of Environmental Health
510 567-6781

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From: Morgan Johnson [<mailto:mjohnson@engeo.com>]
Sent: Friday, October 05, 2012 2:22 PM
To: Weston, Robert, Env. Health

Subject: RE: Revised Permit Application - Crown Chevrolet UST Removal

Ok, thanks. Do you think it will be approved today?

Morgan

From: Weston, Robert, Env. Health [<mailto:robert.weston@acgov.org>]
Sent: Friday, October 05, 2012 2:18 PM
To: Morgan Johnson
Subject: RE: Revised Permit Application - Crown Chevrolet UST Removal

I am not familiar with this site so just needed the info you provided.
I will include in the package.

Robert Weston
Sr. Hazardous Materials Specialist
ICC 5238670-UI
Alameda County Department of Environmental Health
510 567-6781

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From: Morgan Johnson [<mailto:mjohnson@engeo.com>]
Sent: Friday, October 05, 2012 2:12 PM
To: Weston, Robert, Env. Health
Subject: RE: Revised Permit Application - Crown Chevrolet UST Removal

Robert,
Hay Road Landfill is a licensed Class II facility (CAD982042475) located at 6426 Hay Road, Vacaville, CA 95687, (800) 208-2371. Is there any additional specific information that you need?

Morgan

From: Weston, Robert, Env. Health [<mailto:robert.weston@acgov.org>]
Sent: Friday, October 05, 2012 1:25 PM
To: Morgan Johnson
Subject: RE: Revised Permit Application - Crown Chevrolet UST Removal

Morgan,
I am reviewing the revised application. Can you provide information on the Hay Road Landfill you note in the comments for disposal of excavated soil not meeting ACDEH criteria for reuse?

Thanks,

Robert Weston
Sr. Hazardous Materials Specialist

ICC 5238670-UI
Alameda County Department of Environmental Health
510 567-6781

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From: Morgan Johnson [<mailto:mjohnson@engeo.com>]
Sent: Thursday, October 04, 2012 10:14 AM
To: Weston, Robert, Env. Health
Cc: keithfichtner@thekingsmillgroup.com; marshalltorre@thekingsmillgroup.com; jim.neighbor@pruca.com; Jeff Adams; terri.costello@yahoo.com; Roe, Dilan, Env. Health; Shawn Munger
Subject: Revised Permit Application - Crown Chevrolet UST Removal

Good morning Robert,
Attached is the revised permit application for removal of the two USTs at Crown Chevrolet. We will overnight an additional hardcopy to you.

Morgan Johnson, QSD
Environmental Scientist



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Alameda County Environmental Health (ACEH) Local Oversight Program (LOP) Comments on the Underground Storage Tank (UST) Removal Permit Application Package dated October 5, 2012, Crown Chevrolet, Fuel Leak Case RO0003014

ACEH LOP has reviewed the above reference UST Removal Permit Application for items pertaining to the open Fuel Leak Case RO0003014, and has the following comments. Please address the items discussed below and submit for review and approval. Please note that these comments are separate and in addition to those provided by Mr. Robert Weston with the Alameda County CUPA program.

Contingency Plan for Rain Event and/or Encountering Saturated Soil/Groundwater

Given the likelihood that the tank removal will now occur after the start of the rainy season (Oct 15), please submit a contingency plan to address the following items:

- Prevention/removal of water (groundwater or rain water) from open excavation pit including plans for containerizing water and sampling if necessary.
- BMPs to stabilize stockpiled soil from wind/rain events, contain liquids from saturated soil, etc.

Comments on Table 1 – Concentrations for CAM 17 Metals, Class II Base Material, Vulcan Quarry

- The laboratory analysis is dated March 19, 2007. Please submit justification that the data is representative of the rock that will be delivered to the site, or submit recent laboratory data.
- Reported laboratory detection limits for Selenium and Thallium are misreported as 1.0 mg/kg rather than 2.0 mg/kg. Use of correct values calls into question whether Thallium concentrations are above the Table A ESLs of 1.3 mg/kg. Please correct the table and resubmit with justification supporting use of imported material.
- Note 1 states that the screening level applies to Cr III and that the total chromium reported by the laboratory is assumed to be Cr III. Please verify your assumptions.
- Note 2 references an August 2008 DTSC Guidance for Sampling Agricultural Properties to justify use of the rock with arsenic concentrations above the ESLs. In lieu of site specific background data, please provide data on the regional background concentration of arsenic in the Dublin area.
- Note 3 use a hazard coefficient of 1.0 to justify the use of an ESL for vanadium of 78 mg/kg. The use of the more conservative hazard coefficient of 0.2 is used to address potential cumulative health effects at sites with multiple contaminants. Please provide further justification for your use of a HC of 1.0.

Given that the imported rock will be used to fill the excavation pit which will be subsequently capped with concrete, the use of ESLs for direct exposure of construction/trench worker exposure scenario (Table K-3) may be appropriate, if it can be demonstrated that this area will remain capped under the proposed redevelopment plans and not be exposed in shallow soils if excavation activities are conducted in this area.