

**From:** [Detterman, Karel, Env. Health](#)  
**To:** ["Hunter, Brett \(BLHU\)"; York, Kelly C; "Hong jacqueline Gardner"; "honggardner@yahoo.com"; "R Miller"; "JillianHolloway@chevron.com"](#)  
**Cc:** [Roe, Dilan, Env. Health; "Herzog, David"; Fischer, Alexis N](#)  
**Subject:** Fuel Leak Case No. R00003087, Hong Gardner Property, GeoTracker Global ID T10000003434, 7600 MacArthur Blvd., Oakland, CA  
**Date:** Monday, March 03, 2014 2:51:24 PM  
**Attachments:** [Attachment 1 and ftpUploadInstructions 2012 07 25.pdf](#)

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Dear Ladies and Gentlemen:

Thank you for participating in a conference call on February 19, 2014 attended by representatives from Chevron, Conestoga-Rovers & Associates (CRA), Chevron's consultant, and the property owner.

Alameda County Environmental Health Department (ACEH) staff has reviewed the case file, including the *Work Plan for Site Investigation* (Work Plan) dated November 15, 2013 in conjunction with the State Water Resources Control Board's (SWRCB) Low Threat Underground Storage Tank Case Closure Policy (LTCP). The work plan was prepared and submitted on your behalf by CRA. Thank you for submitting the Work Plan.

The Work Plan, comprised of a Site Conceptual Model and a Data Gap Summary and Proposed Investigation, describes the proposed investigation consisting of installing seven soil borings or groundwater monitoring wells, soil and grab groundwater sampling, a well survey, a Sanborn map review, and an on-site geophysical survey.

Based on ACEH staff review of the work plan the proposed scope of work is conditionally approved for implementation provided that the proposed work is performed in a phased approach and the technical comments are addressed as described below. As discussed during the teleconference call, please conduct the Sanborn map review and geophysical survey first then submit the results of this work along with a Work Plan Addendum incorporating the elements described in Technical Comment 6 for approval prior to implementing the second phase of work. Please provide 72-hour advance written notification to this office (e-mail preferred to: [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org)) prior to the start of field activities.

#### **TECHNICAL COMMENTS**

- 1. Claim Site On Geotracker** - As described in the Attachment 1, Responsible Party(ies) Legal Requirements/Obligations, all technical reports must be submitted to both the ACEH ftp website and the SWRCB GeoTracker website. To upload to the Geotracker website you will need to claim your site on GeoTracker and then upload the Work Plan and all future reports to the GeoTracker website. Pursuant to CCR Sections 2729 and 2729.1, all analytical data submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, should groundwater wells be required, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports (Leaking Underground Fuel Tank or Site Cleanup Program) is required in GeoTracker (in PDF format). Please upload all reports prepared after July 1, 2005 to the SWRCB's Geotracker database website in accordance with the above-cited regulation. Please additionally upload the reports to the ACEH ftp website.
- 2. Request for information** - The ACEH case file for the subject site contains only the electronic files listed on our web site at <http://www.acgov.org/aceh/lop/ust.htm>. You are requested to submit copies of all other reports, data, correspondence, etc. related to environmental investigations for this property (including Phase I reports) not currently contained in our case file by the date specified below. It appears that a Phase I Report may have been prepared for the site because the October 19, 2007 Report includes "Property Photographs" from an undated report prepared by AEI Consultants for the site.

Additionally, boring logs for soil borings B-1 through B-4 and laboratory analytical sheets for all soil samples collected from B-1 through B-4 are missing from the October 19, 2007 *Preliminary Site Characterization Report* by Golden Gate Tank Removal, Inc. (GGTR). Please submit a complete version of the October 19, 2007 *Preliminary Site Characterization Report* by Golden Gate Tank Removal, Inc. by the date specified below.

3. **Site Access Agreement** – During the February 19, 2014 conference call, Chevron representatives indicated that a site access agreement had been sent the previous week to the property owner. ACEH requests that the parties submit a signed access agreement to ACEH by the date specified below. Please note, that if you deny site access or do not respond by the date specified below, then this Agency and the Regional Water Quality Control Board may hold you legally responsible for the site investigation and cleanup of your property at your own expense. Since the costs for such investigations and cleanup are often high, allowing access to Chevron and their consultant is clearly more reasonable. Please submit a copy of the signed access agreement by April 4, 2014.
4. **Geophysical Survey and Sanborn Map Review** – The work plan proposes to evaluate Sanborn maps and use geophysical methods to locate additional on-and off-site sources and UST system infrastructure remaining in the subsurface. ACEH requests extending the geophysical effort to include the hydraulic and other lifts, dispenser islands, product and vent lines, and subsurface structures associated with all generations of USTs. Please send Standard Operation Procedures (SOPs) for the geophysical survey to ACEH in an email prior to conducting the geophysical work and in accordance with the Technical Report Request below. Present the results of the geophysical survey in the Work Plan Addendum requested in Technical Comment 6.
5. **Future Site use** - Since site cleanup goals are based on site use, ACEH requests submittal of any information on future site development or divestment to ACEH by the date specified below. If the requested information is not provided by the date specified below, investigation and cleanup will proceed on existing commercial land use.
6. **Request for Work Plan Addendum** – The work plan addresses most of the elements of ACEH's November 21, 2012 directive letter however, clarification is requested on the items discussed below:
  - a. **Rapid Assessment Methods** – As discussed in the meeting, ACEH recognizes that the site investigation may benefit from the use of rapid site assessment techniques (CPT or equivalent) to identify water bearing zones to facilitate optimal grab groundwater sample collection and screen intervals for new monitoring wells. If this approach is adapted, please present SOPs for the chosen rapid site assessment technique(s) in the Work Plan Addendum.
  - b. **Representative Shallow Soil Samples** – The Work Plan proposes hand clearing or using an air knife to a depth of eight feet below grade surface (bgs) to clear for subsurface obstructions or utilities. Since ACEH is concerned that the use of an air knife will volatilize target compounds resulting in low-biased analytical results, please clear all boring locations by hand auguring. Please present a strategy to sample and analyze soil samples in the surface to five foot interval and the five to ten foot interval, at the groundwater interface, lithologic changes, and at areas of obvious impact to collect sufficient data to satisfy the SWRCB's LTCP's direct contact and outdoor air exposure media-specific criteria.
  - c. **Well Screen Interval and Groundwater Monitoring and Sampling Program** – The Work Plan proposes to install monitoring wells with screen intervals from 20-30 feet bgs. Please provide justification for the screen interval selection and data quality objectives (DQO's) and support your rationale with appropriate technical justification (i.e. Practical Handbook of Environmental Site Characterization and Groundwater Monitoring, David M. Nielsen (editor), 2006, 2<sup>nd</sup> Edition or comparable technical guidance). Please note that if monitoring wells are installed, they are

required to be sampled on a quarterly basis for a minimum of one year after installation, and that a reduced sampling interval may be appropriate thereafter.

- d. **Well Survey** - Please use records from both the Alameda County Public Works Agency (ACPWA) and California Department of Water Resources because information from these two sources is sufficiently different to warrant inclusion of both.
- e. **Plot Work Plan on Aerial Photo Areal Maps** - To help understand the site and vicinity, please also include in all future reports an extended site map using an aerial photographic base map to depict both the site and immediate vicinity.
- f. **Analysis for Waste Oil Constituents** - ACEH generally concurs with the proposed analytical suite outlined in the Work Plan; however, due to uncertainty in historical UST locations, ACEH requests that analysis for chlorinated solvents, naphthalene, Polycyclic Aromatic Hydrocarbons (PAHs), wear metals, and fuel oxygenates by appropriate methods be performed on soil and groundwater samples collected during this and future investigations, depending on the results.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **March 19, 2014** – Claim site in Geotracker, Report upload, and Geotracker Submittal Notification  
Files to be named: RO3087\_CORRES\_L\_yyyy-mm-dd
- **March 19, 2014** – Geophysical SOPs e-mailed and included with Work Plan Addendum and Geophysical Survey Results (requested below)  
File to be named: RO3087\_WP\_yyyy-mm-dd
- **March 26, 2014** – Environmental Reports including AEI Consultant's Phase I Report and the missing information from GGTR's 10/19/2007 *Preliminary Site Characterization Report*  
File(s) to be named: RO3087\_MISC\_R\_yyyy-mm-dd
- **April 4, 2014** – Signed Site Access Agreement  
File to be named: RO3087\_CORRES\_L\_yyyy-mm-dd
- **April 4, 2014** – Description of Future Site Use  
File to be named: RO3087\_CORRES\_L\_yyyy-mm-dd
- **May 2, 2014** – Work Plan Addendum and Geophysical Survey Results  
Files to be named: RO3087\_WP\_yyyy-mm-dd
- **October 31, 2014** – Soil and Groundwater Investigation Report  
File to be named: RO3087\_SWI\_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>. If your email address does not appear on the cover page of this notification, ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your

case.

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](mailto:karel.detterman@acgov.org) or call me at (510) 567-6708.

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PDF copies of case files can be downloaded at:

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