

From: [Detterman, Karel, Env. Health](#)
To: [Susan Casentini](#)
Cc: "[Cook Environmental](#)"; [Roe, Dilan, Env. Health](#)
Subject: Fuel Leak Case No. R00003125 and GeoTracker Global ID T10000005131, Milligan & Casentini Property, 385 26th Street Avenue, Oakland, CA 94612
Date: Friday, September 19, 2014 6:08:17 PM
Attachments: [Attachment 1 and ftpUploadInstructions 2014-05-15.pdf](#)

Hello Mr. Milligan and Ms. Casentini:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Revised Data Gap Investigation Work Plan Addendum and Site Conceptual Model* (Revised Work Plan) dated July 25, 2014, prepared and submitted on your behalf by Cook Environmental Services, Inc. (Cook Environmental). The Revised Work Plan was submitted in response to ACEH's May 23, 2014 Directive letter. Thank you for submitting the Revised Work Plan.

Based on ACEH staff review of the Revised Work Plan in conjunction with the case files and the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP), the proposed scope of work is conditionally approved for implementation provided that the technical comment below is incorporated during the proposed work. Submittal of a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: karel.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- 1. LTCP Media Specific Criteria for Direct Contact and Outdoor Air Criteria** – To satisfy this criteria, soil samples must be collected from each of the six borings at the 0 to 5 and 5 to 10-foot intervals, in addition to the groundwater interface, lithologic changes, and at areas of obvious impact. In each boring location, please analyze soil samples collected from the 0 to 5 feet and 5 to 10 feet bgs for Total Petroleum Hydrocarbons as gasoline (TPHG), TPH as diesel (TPHD), and TPH motor oil (TPHMO) by modified EPA 8015, and volatile organic compounds (VOCs) including naphthalene by EPA Method 8260B, and semi-volatile organic compounds (SVOCs) including polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8270, to address the data gaps identified above. Please ensure soil samples are collected in the 0 to 5 and 5 to 10-foot intervals in each boring to define the bioattenuation (unsaturated) zone and the Direct Contact Media Specific Criteria of the Low Threat Closure Policy.
- 2. LTCP Media Specific Criteria for Groundwater** – To satisfy this criteria, please analyze all grab groundwater samples for TPHG, TPHD, and TPHMO by modified EPA 8015, VOCs including naphthalene by EPA Method 8260B.
- 3. LTCP Media Specific Criteria for Vapor Intrusion to Indoor Air** – To satisfy this criteria, please ensure that the soil vapor sampling is conducted in accordance with the DTSC's Advisory Active Soil Gas Investigations dated April 2012. Additionally, we request collection and analysis of one soil vapor sample using EPA Method TO-17 to confirm the analysis using EPA Method TO15 due to the reduced recovery of naphthalene when using Nylaflo tubing as observed in small samples, as discussed in the Advisory Active Soil Gas Investigations. The method for sample collection and analysis using EPA Method TO-17 must be consistent with those described in the Advisory Active Soil Gas Investigations. The stated purpose of the soil vapor borings is to determine if the site qualifies for closure under LTCP Scenario 4. Please note that use of criteria i and ii, Scenario 4 of LTCP's Media-Specific Criteria Petroleum Vapor Intrusion to Indoor Air require the definition of the site's bioattenuation (unsaturated) zone. Additionally, for an existing building, the soil gas measurements must be taken at least 5 feet below the bottom of the

building foundation, including the footing depth.

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 Attachment 1 and the following specified file naming convention and schedule:

- **December 1, 2014** – Soil and Groundwater Investigation Report and updated SCM
File to be named: RO3125_SWI_SCM-y-mm-dd

This report is 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.

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.

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PDF copies of case files can be downloaded at:

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