ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY REBECCA GEBHART, Interim Director

DEPARTMENT OF ENVIRONMENTAL HEALTH LOCAL OVERSIGHT PROGRAM (LOP) For Hazardous Materials Releases 1131 HARBOR BAY PARKWAY, SUITE 250 ALAMEDA, CA 94502 (510) 567-6700 FAX (510) 337-9335

July 7, 2017

M. J. Garfinkle and Susan G. Block etal (Sent via e-mail to: garsurg@comcast.net) 352 Capetown Drive Alameda, CA 94502-6426

Ms. Nicole Arceneaux (Sent via e-mail to: Nicole.Arceneaux@chevron.com)
Ms. Carryl MacLeod (Sent via E-mail to: cmacleod@chevron.com)
Chevron Environmental Management Company
6001 Bollinger Canyon Road
San Ramon, CA 94583

Subject:

Technical Report Request for Fuel Leak Case No. RO0003230 and GeoTracker Global ID T10000009401, 1200 Park Street, 1200 Park Street, Alameda, CA 94501

Technical Report Request for Site Cleanup Program Case RO0003253 and GeoTracker Global ID T10000010519, Auto Service Garage Building, 2407 San Jose Avenue, Alameda, CA 94501

Ladies and Gentlemen:

Thank you for submitting the following documents to Alameda County Department of Environmental Health (ACDEH):

- May 11, 2016, Limited Phase II Environmental Site Assessment Report (Phase II), 1200 Park Street, Alameda, CA, prepared for Aaron Engi, TBC Corporation
- November 10, 2016, Former Chevron Station No. 90955, 1200 Park Street, Alameda, CA; APN 070-0184-015 (Operational History), prepared and submitted by Chevron Environmental Management Company (CEMC)
- January 20, 2017 Summary of Findings for Property History and Chemical Use Information Research for 1200 Park Street, 1210 Park Street, 1222 Park Street, and 2407 San Jose Avenue, Alameda, CA prepared and submitted by Terraphase Engineering on behalf of the Garfinkle Trust
- February 3, 2017 Work Plan for Additional Site Assessment (Work Plan) prepared and submitted by GHD for Chevron Environmental Management Company (CEMC)
- May 10, 2017 Work Plan Addendum (Addendum) prepared and submitted by GHD for CEMC
- May 26, 2017 Correspondence Regarding 1200 Park Street, Alameda, ("property" or "site")
 prepared and submitted by Diepenbrock Elkin Gleason LLP

Review of the case file including the documents listed above indicates that the site consists of one parcel, Assessor Parcel Number (APN) 70-184-15, and the parcel's dimension are 107.67 feet (along Park Street) by 116.87 (along San Jose Avenue). The parcel houses two addresses, 1200 Park Street and 2407 San Jose Avenue and businesses at each address had different uses. The 1200 Park Street address was used as a gasoline service station from approximately 1928 to 1978. The 2407 San Jose Avenue address was a two-story brick building used from the 1920's to 1956 by Clamp-Swing Pricing Company, then from 1957 to 1982 as auto service garages including D & R Auto Service Garage and The Wrenchouse. In 1983 Big O Tires began occupancy of the entire parcel, which continues to the present.

Ladies and Gentlemen RO0003230 and RO0003253 July 7, 2017, Page 2

Gasoline service station plans provided in the Operational History prepared and submitted by CEMC indicates that the gasoline service station portion of the parcel measured 107.67 feet along Park Street and 70.00 feet along San Jose Avenue and excludes the two-story brick building at 2407 San Jose Avenue. Therefore ACDEH is splitting the existing case into two cases: the Leaking Underground Storage Tank (LUST) case at 1200 Park Street formerly used as a gasoline service station and a Site Cleanup Program (SCP) case at 2407 San Jose Avenue formerly used by Clamp-Swing Pricing Company, and auto service garages. ACDEH recognizes that while Big O Tire leased the entire parcel after 1983, Chevron (Standard Oil of California) was the only business to occupy the parcel that included USTs; consequently, the UST case is being evaluated under the State Water Resources Control Board's Low Threat Closure Policy (LTCP) to identify and fill technical data gaps, and develop a path to case closure. The SCP case will similarly use LTCP criteria because the LTCP states that it is appropriate to apply the policy to other petroleum releases from non-LUST sources. ACDEH will concurrently issue a request for funds for the new SCP case (RO0003253) under separate cover.

The Technical Comments provided below are consequently divided by case type, starting with the UST case.

A. TECHNICAL COMMENTS: Fuel Leak Case No. RO0003230, 1200 Park Street, Alameda, CA 94501

The December 2016 Directive Letter ACDEH provided the summary of an analysis of the case file in comparison to the State Water Resources Control Board's Low Threat Closure Policy (LTCP). ACDEH determined that the site does not meet the LTCP General Criteria d (Free Product Removal), e (Site Conceptual Model), f (Secondary Source Removal), and the Media-Specific Criteria for Groundwater, the Media-Specific Criteria for Vapor Intrusion to Indoor Air, and the Media-Specific Criteria for Direct Contact and Outdoor Air Exposure.

Based on ACEDH staff review of the February 2017 *Work Plan* and the May 2017 *Addendum*, the proposed scopes of work are approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or the technical comment 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.

two additional soil borings at the locations of two former waste oil USTs, hereby designated the 1967 WO UST and the 1988 WO UST. A *Tank Removal Sampling Report 88271-M-1*, dated October 4, 1988 prepared by Blaine Tech Services, Inc. (Blaine) was included as Attachment C with CEMC's Operational History. Two soil samples were obtained during the WO UST removal, one from each end of the WO UST at a depth of 9 feet below grade surface (bgs). Both were analyzed for volatile organic compounds (VOCs) by EPA Method 624/8240 and Total Petroleum Hydrocarbon (TPH) by EPA 8015/503E/8020; however, neither soil sample was analyzed for polyaromatic compounds (PAHs) including naphthalene. Therefore, in addition to the proposed soil sampling, please collect and analyze a soil sample from the 5 to 10-foot bgs interval from the soil boring proposed at the 1988 WO UST by EPA 8270 for PAHs including naphthalene with the Selected Ion Monitoring (SIM) mode to ensure that the detection levels of PAHs are below the concentrations specified in the LTCP for Direct Contact and Outdoor Air Exposure.

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- 2. Hoist/Work Bays: According to the Attachment D, *Historical Site Plan* in CEMC's Operation History, the building located in the northern part of the Gasoline Service Station included an area labeled *Lubrication* in which two hoist or service bay structures are indicted. Therefore, the hoist/work bays were a part of the property that was leased by Standard Oil Company of California (Standard) and are related to service station operations; but analytical results of Phase II soil samples from borings B-1, B-2, and B-3 taken at 10 feet to 11.5 feet bgs provided adequate vertical definition; consequently, at this time, no further investigation in the hoist/work bays area is needed.
- 3. Groundwater Monitoring and Sampling: Upon installation and development of the four new wells, please commence quarterly groundwater monitoring and sampling for a minimum of one year. Please analyze groundwater samples as described in the Work Plan and provide quarterly reports 30 days after analytical results are received. Please include a rose diagram in each report. Please analyze all groundwater samples for Total Petroleum Hydrocarbons as gasoline (TPHg), TPH as diesel (TPHd) (one time with and without silica gel cleanup), TPH as motor oil (TPHmo), benzene, toluene, ethylbenzene, and xylenes (BTEX), and naphthalene with appropriate detection levels.

<u>TECHNICAL REPORT REQUEST</u>: Fuel Leak Case No. RO0003230, 1200 Park Street, Alameda, CA 94501

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:

- **September 15, 2017** Soil and Groundwater Investigation Report and Site Conceptual Model File to be named: RO3230_SWI_SCM_R_yyyy-mm-dd
- December 30, 2017 Fourth Quarter 2017 Groundwater Monitoring and Sampling Report File to be named: RO3230_GWM_R_yyyy-mm-dd
- March 30, 2018

 First Quarter 2018 Groundwater Monitoring and Sampling Report
 File to be named: RO3230_GWM_R_yyyy-mm-dd
- June 30, 2018 Second Quarter 2018 Groundwater Monitoring and Sampling Report File to be named: RO3230_GWM_R_yyyy-mm-dd
- **September 30, 2018** Third Quarter 2018 Groundwater Monitoring and Sampling Report File to be named: RO3230_GWM_R_yyyy-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. Online case files are available for review at the following website: http://www.acgov.org/aceh/lop/ust.htm

B. <u>TECHNICAL COMMENTS:</u> Site Cleanup Program Case RO0003253, Auto Service Garage Building, 2407 San Jose Avenue, Alameda, CA 94501

During the Phase II investigation, two soil boings, B-5 and B-6 were placed in the vicinity of the patched cutout and hoist inside the brick building. TPHg, TPHd, and TPHmo were detected in soil and grab groundwater samples taken from B-6 located at the patched cutout in the northern side of the brick building. A soil sample taken from B-5 at a depth of 10 feet bgs adjacent to a hoist located in the south side of the building did not detect TPHg, TPHd, or TPH, however, analyses for VOCs was not performed. ACDEH requests preparation of a Work Plan to investigate the existence of TPH impacts to soil and groundwater in the vicinity of the patched cutout and hoist inside the brick building.

- 1. Request to Define Lateral and Vertical Extent of TPH in Soil and Groundwater: In the Work Plan requested below, please propose an adequate number of soil borings in the vicinity of borings B-5 and B-6 and the patched cutout and hoist to delineate the lateral and vertical extent of TPH impact in soil and groundwater.
- 2. Soil and Groundwater Sample Collection and Analyses: In the Work Plan requested below, please propose soil samples collection from each of the soil borings between the 0 to 5 and 5 to 10-foot interval. ACDEH requests soil sample collection at the groundwater interface, lithologic changes, and at areas of obvious impact to define the vertical and lateral extent. Additionally, all grab groundwater and soil samples are requested to be analyzed for TPHg, TPHd, and TPHmo by modified EPA 8015, and full scan volatile organic compounds (VOCs) including naphthalene by EPA Method 8260B, and semi-volatile organic compounds (SVOCs) by EPA Method 8270 Selected Ion Monitoring (SIM) mode. Please include on all boring logs photoionization detector (PID) readings, initial and final depths to first encountered groundwater and submit the boring logs with the report requested below.
- 3. 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 ACDEH ftp website and the State Water Resource Control Board (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 (LUFT or SLIC) 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. At the same time, please upload the reports to the ACDEH ftp website.
- 4. Request for information The ACDEH 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. Please submit electronic copies of all other reports including Phase I Reports, laboratory data, correspondence, etc. related to environmental investigations for this property not currently contained in our case file by the date

specified in the Technical Report Request Section below. ACDEH requests e-mail notification of, and a list of the documents uploaded to Geotracker by the date listed below.

5. Electronic Submittal of Information (ESI) Compliance - Site data and documents are maintained in two separate electronic databases – ACDEH's ftp site and the SWRCB's GeoTracker database. Both databases act as repositories for regulatory directives and reports; however, only GeoTracker has the functionality to store electronic compliance data including analytical laboratory data for soil, vapor and water samples, monitoring well depth-to-water measurements, and surveyed location and elevation data for permanent sampling locations. Although the SWRCB is responsible for the overall operation and maintenance of the GeoTracker System, ACDEH, as lead regulatory agency, is responsible to ensure the GeoTracker database is complete and accurate for sites regulated under ACDEH's Environmental Cleanup Oversight Programs (SWRCB March 2011 document entitled *Electronic Reporting Roles and Responsibilities*).

A review of the case file and the State's GeoTracker database indicates that the site is not in compliance with California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, stating that beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs, including the Site Cleanup Program (SCP) cases. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites was required in GeoTracker. At present missing data and documents include, but may not be limited to, EDF submittals, depth to groundwater data (GEO_WELL files), well data (GEO_XY, and GEO_Z files), work plans, and older reports (GEO_REPORT files).

Please upload requisite documents to GeoTracker. See Attachment 1 and the State's GeoTracker website for further details. ACDEH requests e-mail notification of, and a list of, the documents uploaded to Geotracker. Please upload all submittals to GeoTracker and to ACDEH's ftp website by the date specified below.

<u>TECHNICAL REPORT REQUEST</u>: Site Cleanup Program Case RO0003253, Auto Service Garage Building, 2407 San Jose Avenue, Alameda, CA 94501

Please upload technical reports to the ACDEH 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:

- September 1, 2017 Upload all environmental investigations, laboratory data, and correspondence to Geotracker and ACDEH's ftp site
 File(s) to be named: RO3253_MISC_R_yyyy-mm-dd
- September 1, 2017 Claim site in Geotracker
- September 30, 2017 Work Plan

File to be named: RO3253_WP_R_yyyy-mm-dd

Ladies and Gentlemen RO0003230 and RO0003253 July 7, 2017, Page 6

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

Please note that ACDEH has updated Attachment 1 regarding report submittals to ACDEH. ACDEH will now require a Submittal Acknowledgement Statement, replacing the Perjury Statement, as a cover letter signed by the Responsible Party. The language for the Submittal Acknowledgement Statement is as follows:

I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the SWRCB's Geotracker Website. Please make this change to your submittals to ACDEH.

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 Hazardous Materials Specialist

Enclosures: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations

ACDEH Electronic Report Upload (ftp) Instructions

cc: Kiersten Hoey, GHD, 5900 Hollis Street, Suite A, Emeryville, CA 94608 (Sent via e-mail to: Kiersten.hoey@ghd.com)

Nicole Gleason, Esq., Diepenbrock Elkin Gleason, 500 Capitol Mall, Suite 2200, Sacramento, CA 95814 (Sent via E-mail to: ngleason@diepenbrock.com)

Robert Goodman, Esq., Rogers Joseph O'Donnell, 331 California Street, 10th Floor, San Francisco, CA 94104 (Sent via E-mail to: rgoodman@rjo.com)

Ben Garfinkle, (Sent via E-mail to: bgarfinkle@clampswing.com)

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: paresh.khatri@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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) 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 File Transfer Protocol (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 SCP 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 (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/) for more information on these requirements.

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 ACDEH's FTP server and the SWRCB's GeoTracker website." 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 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. 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 case meet this requirement. 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

Please note that delays in investigation, late 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 SCP)

REVISION DATE: December 1, 2016

ISSUE DATE: July 5, 2005

PREVIOUS REVISIONS: October 31, 2005;

December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016

SECTION: Miscellaneous Administrative Topics & Procedures

SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) 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.
- <u>Do not</u> 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. <u>Documents</u>
 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) Open File Explorer using the Windows 🏙 key + E keyboard shortcut.
 - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) On the address bar, type in ftp://alcoftp1.acgov.org.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
 - d) Click Log On.
 - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - f) 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.
- 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.