



ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 LOCAL OVERSIGHT PROGRAM (LOP)
 For Hazardous Materials Releases
 1131 Harbor Bay Parkway
 Alameda, CA 94502-6577

OAKLAND
 CA 945
 05 OCT '18
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Frederick D. and Geraldine G. Emory Trust
 257 Clear NIXIE 957 DE 1
 Roseville,
 Attn: Dewolfe

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ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

COLLEEN CHAWLA, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP) FOR
HAZARDOUS MATERIALS RELEASES
1131 HARBOR BAY PARKWAY
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

October 5, 2018

Quik Stop Markets, Inc.
4567 Enterprise Street
Fremont, CA 94538
Attn.: Roger Batra
(Sent via electronic mail to: rogerbatra@quikstop.com)

Frederick D. and Geraldine G. Emory Trust
257 Clearview Court
Roseville, CA 95747
Attn: Dewolfe Emory, Trustee

Subject: Work Plan Review; Fuel Leak Case No. RO0003209 and Geotracker Global ID T10000008568, Quik Stop Market #51, 3130 35th Avenue, Oakland, CA 94619

Dear Responsible Parties:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the document entitled *Data Gap Investigation Work Plan* (Work Plan), dated August 31, 2018 and prepared by Compliance & Closure, Inc. (CCI) on your behalf.

The 87-page Work Plan submittal includes 17 Sections according to its Table of Contents. None of the Sections appear in the submitted document. Our review is based on Appendix A- Site Conceptual Model (SCM). The SCM includes a data gap section which proposes work to access soil, groundwater and soil vapor concerns. This review was performed for the work proposed to address soil vapor. A review of the work proposed to address the soil and groundwater data gaps will be presented under separate cover. Additional data may be available that ACDEH is not aware of, or may not have been submitted, and therefore has not been incorporated in to ACDEH's review. If additional data is made available, the data can be incorporated in future LTCP reviews.

ACDEH has evaluated the data presented in the above-mentioned report, in conjunction with the case files and the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). As an active commercial fueling station, the site is exempt from the vapor intrusion to indoor air (VI-IA) criteria of the LTCP. However, the site may present a VI-IA risk to the adjacent residential and commercial properties as multiple secondary lines of evidence for soil, groundwater, and photoionization detector (PID) data exist indicative of the presence of light non-aqueous phase petroleum hydrocarbons (LNAPL).

In the Work Plan, CCI proposes to advance temporary soil vapor probes for the collection of soil gas samples. Seven probe locations are depicted on Figure 2 of the Work Plan. Five of the probe locations are on-site with two situated near the western property boundary and two near the southern property boundary. The fifth soil probe location is situated near the center of the site, adjacent to a proposed groundwater monitoring well location. Two off-site soil vapor probes are depicted down gradient to the site, one approximately 75 feet to the west-southwest in the 35th Avenue right-of-way (ROW), and the other approximately 160 feet to the southwest in the Hageman Avenue ROW.

As presented, the temporary soil vapor wells will be constructed by pushing rods to a depth of approximately five feet. A sand pack having a thickness of one foot will be placed at the bottom of the probe hole and a vapor implant will be placed at the vertical midpoint of the sand pack. The probe hole will be completed to the ground surface with a bentonite seal. The soil vapor samples will be analyzed for total petroleum hydrocarbons (TPH) as gasoline (TPHg) using EPA Test Method TO-3 and benzene, toluene, ethylbenzene, and xylenes (collectively BTEX) and fuel oxygenates using EPA Test Method TO-15.

Our evaluation of the Work Plan under the LTCP that is presented below addresses apparent inconsistencies with the LTCP. Therefore, ACDEH requests that you prepare a Soil Vapor Investigation Work Plan (SVIWP) to address the Technical Comments provided below. If sections of the Work Plan pertaining to the soil vapor investigation were inadvertently missing from the submittal, please incorporate the missing section(s) into the requested SVIWP.