

From: [Detterman, Karel, Env. Health](#)
To: [John Buestad](#); "[Robert Robitaille](#)"
Cc: [Ken Carvalho](#); [Jamie Keating](#); [Tom Graf](#); [Roe, Dilan, Env. Health](#)
Subject: Fuel Leak Case No. RO0000008 and GeoTracker Global ID T0600100655, Good Chevrolet Parcel B, 1630 Park Street, Alameda, CA 94501
Date: Thursday, September 12, 2013 5:47:11 PM

Hello John and Bob:

Alameda County Environmental Health (ACEH) has reviewed the September 4, 2013 *Interim Source Removal Work Plan* (Work Plan) in conjunction with the SWRCB's Low Threat Underground Storage Tank Case Closure Policy. ACEH generally concurs that the scope of work is necessary to mitigate potential risk of vapor intrusion to occupants of the proposed new building and that excavation while the lot is still undeveloped is the most efficient and cost-effective remedial approach. Therefore, please decommission wells DPE-5, SV-5, SV-10, and SV-11 to facilitate the excavation activities. However, prior to conducting the excavation activities please address the following comments in a Work Plan Addendum:

1. Soil Vapor Probe reinstallation: One soil vapor probe is proposed to be installed within the excavation backfill, however ACEH notes that soil vapor probes should be installed in native material around the excavation. Please provide the rationale for installing replacement vapor probe(s) just outside the excavation extent but in the building pad footprint.
2. Proposed cleanup targets for the excavation: Please revise the limits for TPH-g and TPH-d so they are consistent with the May 2013 RWQCB ESLs Summary Table A.
3. Imported Fill: Please submit a strategy to ensure that fill material is imported to the site in accordance with DTSC's October 2001 *Clean Imported Fill Material Information Advisory*. Please ensure that the permeability of the fill material is less than or equal to that of the native material to avoid potential groundwater ponding beneath the building in the vicinity of the excavated hydraulic lift.
4. Excavation and Off-Site Disposal Activities: Please describe excavation and off-site removal procedures including, but not limited to, dust control mitigation, truck loading, load tarping, truck routes, truck tire decontamination/cleaning, and traffic control. Additionally provide the details of the "hot-loaded" procedure.
5. Groundwater Handling and Disposal: Please provide an estimate of the amount of groundwater to be removed and the number, type, and size of tanks required for disposal.
6. Confirmation soil sampling and Contingency Plan: The work plan states that the final excavation extents will be based upon the confirmation soil sample analytical results, and if the goals are not met, the excavation will be enlarged as feasible based on proximity to the property line, underground utilities, or other structures. In order to minimize costs due to unnecessary excavation activities and associated backfill, please provide details for conducting additional incremental excavation and/or hot spot removal and step-out sampling. Additionally, please provide SOPs for the collection of confirmation soil samples.

ACEH notes that based on field observations and analytical results, a replacement monitoring well may be required to monitor the status of free-product that was found in that vicinity.

Please provide the results of the well decommissioning and soil excavation and backfill activities in an Interim Remediation Results Report by November 13, 2013. Please upload the file to ACEH's ftp site and Geotracker in accordance with the following naming convention: RO8_IR_R_mm-dd-yyyy.

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PDF copies of case files can be downloaded at:

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