

**From:** [Detterman, Karel, Env. Health](#)  
**To:** [Mary](#); ["Neil"](#); [Giorgio Molinaro](#); ["Belinda.Butler-Veytia@erm.com"](#)  
**Cc:** ["tim.post@waterboards.ca.gov"](#); ["Cullen.Pat@Waterboards"](#); [Roe, Dilan, Env. Health](#)  
**Subject:** Fuel leak Case RO27 and GeoTracker Global ID Number T0600102106 - Grove Street Wash Rack, 3884 Martin Luther King Jr. Way, Oakland, CA  
**Date:** Friday, September 04, 2015 1:28:08 PM  
**Attachments:** [Attachment 1 and ftpUploadInstructions 2014-05-15.pdf](#)  
[Attachment 2 GeoTracker Reporting Requirements.pdf](#)

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Hello Everyone:

Thank you for participating in a conference call with Alameda County Environmental Health (ACEH) on September 1, 2015. Participants on the call included Dilan Roe and Karel Detterman (ACEH), Neil Cotter (Responsible Party), and Giorgio Molinaro and Belinda Butler-Veytia, ERM, Inc. (RP's new consultant).

The purpose of this call was summarized in my August 20, 2015 e-mail and was prompted by a recent claim received by the USTCF for \$640,000 to conduct remedial activities described in the December 18, 2014 *Remedial Design Implementation Plan* (RDIP) and ACEH and USTCF's review of data in the case file.

The following topics were discussed during our call on September 1, 2015:

- Non-compliance with uploading required data to the State Water Resources Control Board (SWRCB's) Geotracker data base;
- The most cost-effective remedial approach given the absence of a development plan for the site and increasing benzene concentrations in groundwater monitoring wells MW-2 and MW-4 since well installation in 2013, as documented in the *First Quarter 2015 Groundwater Monitoring Report* dated April 14, 2015 prepared by URS Corporation (URS), the RP's former consultant. The *Draft Feasibility Study/Corrective Action Plan* (FS/CAP) dated October 8, 2013 and the *Remedial Design and Implementation Plan* (RDIP) dated September 14, 2014 prepared by URS was approved by ACEH based on redevelopment plans prepared by Meta Housing that included construction of a subsurface garage covering the entire footprint of the site and associated removal of the upper 12 feet of soil by the developer. Due to the subsequent withdrawal of Meta Housing's redevelopment project, the proposed corrective action is no longer cost effective as substantial shoring would be required to complete the excavation.
- Change of consultants from URS to ERM in June 2015.

As discussed during our conference call, ACEH requests that you address the following Technical Comments and submit the requested reports by the dates provided below to resume advancing your case on the path to commercial closure.

**TECHNICAL COMMENTS:**

- 1. Vapor Intrusion (VI) Risk to adjacent property:** Due to the elevated benzene concentrations detected in monitoring wells MW-2 and MW-4, please verify whether the adjacent structure has a subsurface garage and evaluate potential VI risk to occupants of the adjacent property immediately west of the site;
- 2. FS/CAP review: Please review the Site Conceptual Model (SCM) presented in the FS/CAP and evaluate alternative** cost effective interim remedial actions (including pilot testing) to mitigate VI risk to occupants of buildings on the adjacent property due to elevated benzene concentrations in MW-2 (if required), and other cost effective remedial actions as required to advance the case to closure under the Low Threat Closure Policy media specific criteria. Once the evaluation has been completed please schedule a meeting with ACEH to discuss the

proposed remedial options and next steps to facilitate timely implementation.

3. **Semiannual Groundwater Monitoring:** The site's eight groundwater monitoring wells were last monitored and sampled on March 31, 2015. Please continue semiannual groundwater monitoring of all site wells [in the interim] OR [prior to the anticipated interim remedial action] and submit the reports as per the schedule provided in the Technical Report Request;
4. **GeoTracker Compliance:** The State of California requires the separate upload of groundwater monitoring well data including surveyed field points (please see the attached GeoTracker Reporting Requirements), site figures, boring logs, and Electronic Delivery Format (EDF) laboratory data to Geotracker as described in Attachment 2. Please upload the missing documents and data as per the date provided in the Technical Report Request schedule below.

### **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, according to Attachment 1 and the following specified file naming convention and schedule:

- **October 5, 2015 – Upload documents to GeoTracker as per Attachment 2, *GeoTracker Reporting Requirements***
- **October 30, 2015 – Semiannual Groundwater Monitoring and Sampling Report, Second Half 2015**  
File to be named: RO27\_GWM\_R\_yyyy-mm-dd
- **November 6, 2015 – Schedule Stakeholder Meeting to Discuss Remedial Options**
- **April 30, 2016 – Semiannual Groundwater Monitoring and Sampling Report, First Half 2016**  
File to be named: RO27\_SCM\_R\_yyyy-mm-dd
- **October 30, 2016 – Semiannual Groundwater Monitoring and Sampling Report, Second Half 2016**  
File to be named: RO27\_SCM\_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>.

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>