

ALAMEDA COUNTY
HEALTH CARE SERVICE
AGENCY
COLLEEN CHAWLA, Agency 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
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April 13, 2018

Mr. Pritpaul Sappal
Alaska Gas
2718 Washburn Court
Vallejo, CA 94591
(Sent by e-mail to: sappalp@yahoo.com)

Subject: Expedited Claim Account Pilot Program (ECAP), UST Claim #15262, Fuel Leak Case RO0000127 and Geotracker Global ID T0600100106, Alaska Gasoline 6211 San Pablo Avenue, Oakland, CA 94608

Dear Mr. Sappal:

Thank you for participating in the first Joint Execution Team (JET) conference call with Alameda County Department of Environmental Health (ACDEH) and Underground Storage Tank Cleanup Fund (USTCF) staff on March 30, 2018. The purpose of the call was to introduce the JET team members, discuss the ECAP process, discuss ACDEH and USTCF staff review of the State Water Resources Control Board's Low Threat Closure Policy (LTCP) criteria, and identify additional data collection and assessment required to advance the case to closure.

As discussed on the conference call, ACDEH and the USTCF staff have determined that the case does not meet the following LTCP criteria:

- **General Criteria d (Free Product Removal):** A determination as to whether free product has been removed to the maximum extent practicable cannot be made until additional assessment determines the extent of the free product observed in groundwater monitoring well MW-7. As reported in the most recent *Groundwater Monitoring and Sampling Results Report, Fourth Quarter 2017* dated January 15, 2018 submitted on your behalf by Stratus Environmental, Inc. (Stratus), 0.24 feet or 2.88 inches of light non-aqueous-phase liquid (LNAPL) was observed in monitoring well MW-7 in October 2017 located downgradient and off-site in 62nd Street.
- **General Criteria e (Site Conceptual Model):** The conceptual site model does not assess the extent and mobility of the release. Degraded free product and dissolved phase petroleum hydrocarbon migration in groundwater along utility conduits is uncertain, and the extent of free product and dissolved phase petroleum hydrocarbons in groundwater is not defined. According to a *Utility Survey Figure 2* prepared by HerSchy Environmental, Inc. dated May 27, 2008 and an *Extended Site Plan Figure 2* prepared by AEI Consultants from a *Remedial Action Report* dated October 2011, numerous utilities are located in 62nd Street and Marshall Street and the estimated depth to the utilities ranges from near surface to 6.5 feet below ground surface (bgs). Depth to groundwater in MW-7, screened from 6 to 16 feet bgs, ranges between 1.68 to 7.10 feet bgs; consequently, the underground utilities could provide preferential pathways for dissolved phase and LNAPL migration. Of particular concern are risk to the residences located downgradient of the site that have basements, crawl spaces, and foundation dewatering sumps, and the discharge of the sumps. Sump pumps preventing water infiltration into basements/crawl spaces could potentially draw petroleum hydrocarbon impacted groundwater and/or LNAPL into basements/crawl spaces and complete the exposure pathway to residents.

- **Media-Specific Criteria for Groundwater:** The extent of the dissolved phase petroleum hydrocarbon groundwater plume is undefined.
- **Media-Specific Criteria for Vapor Intrusion to Indoor Air:** Per the LTCP exemption as an active commercial fueling station the site is exempt from the evaluation of vapor intrusion risk to occupants of onsite buildings. However, additional data and evaluation is necessary to determine whether there is a vapor intrusion risk to occupants of offsite buildings.
- **Media-Specific Criteria for Direct Contact and Outdoor Air Exposure:** Onsite direct contact criteria are not met due to the lack of naphthalene data in soil samples at the site and exceedances of the benzene criteria in an isolated area in the vicinity of AS-5-5' (16 milligrams per kilogram) and SS-5-6' (16 milligrams per kilogram). However, a specific investigation to collect confirmation soil samples across the site for naphthalene and remediation of benzene hot spots does not seem to be a good use of remaining funds. As the current land use of the site is a commercial fueling station and entire site is paved institutional controls such as a land use covenant restriction to commercial and a site management plan may be cost effective and sufficient to protect human health under current land use and in the event of future onsite redevelopment.

Further assessment is necessary to determine if there is a risk due to direct contact with groundwater/saturated soil to occupants of residences when digging on their property. Analysis of LTCP direct contact chemicals (benzene, ethylbenzene and naphthalene) should be included in offsite borings advanced for soil sample collection and soil vapor probe installation.

Based on the LTCP evaluation discussed above, additional assessment and data collection is required to fill data gaps and advance the case to closure. As discussed during the teleconference call, ACDEH and USTCF request a phased approach to the data collection and assessment as discussed below.

PHASE 1 – SCOPE OF WORK

Please submit a brief work plan with a scope of work for utility location, foundation survey, and water level/free product measurement in monitoring well MW-7:

1. **Underground Utility Survey** - Update the Hershey Environmental and AEI utility maps with current underground utility location maps obtained from the City of Oakland.
2. **Foundation and Sump Survey** - Conduct a field reconnaissance of all building foundations located within the area bounded by 61st St, Fremont St (61st, "extended" to 63rd), 63rd St, and San Pablo Ave. The survey should include a visual inspection of below grade foundations types (half basement, full basement, crawl space) and evidence of foundation dewatering sumps by the presence of hoses and/or drain lines to street or other configuration. Flyers and door knocking is not required.
3. **Monitoring Well MW-7:** Record the depth to water and free product thickness in MW-7 on the day(s) the foundation survey is conducted.

PHASE 2 – SCOPE OF WORK

Following the foundation and utility survey, the JET will meet to discuss the findings. Based on the findings the JET will determine the next phase of soil, soil vapor and grab groundwater data collection to delineate the dissolved phase and free product plume, and evaluate vapor intrusion risk to offsite properties. The

grab groundwater data may provide information on whether shallow soil gas probes are needed downgradient near residences where water/gas/sewer lines enter the property.

TECHNICAL REPORT REQUEST

Please upload the following technical reports to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

1. Work Plan for Phase 1 Scope of Work

Please submit a brief work plan with the Phase 1 scope of work to the JET via email correspondence for review by the compliance date below. Upon receipt of ACDEH and USTCF staff comments, please finalize the work plan and upload to Geotracker.

Compliance Date: April 27, 2018

File to be Named: RO127_SOW_YYYY-MM-DD

2. Tables and Figures

Please prepare summary tables and figures presenting findings of the foundation and sump survey (by address), the utility survey and MW-7 data. Please submit the tables and figures to the JET via email correspondence two weeks prior to the next JET meeting.

Compliance Date: To be Determined

This report is being requested pursuant to California Health and Safety Code Section 25296.10. Title 23 of the California Code of Regulations Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum underground storage 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.

Sincerely,

Karel Detterman, PG
Senior Hazardous Materials Specialist

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

cc: Scott Bittinger, PG, Stratus Environmental, 3330 Cameron Park Drive, Suite 550, Cameron Park, CA 95682 (Sent via E-mail to: SBittinger@stratusinc.net)

Gowri Kowtha, PE, Stratus Environmental, 3330 Cameron Park Drive, Suite 550, Cameron Park, CA 95682 (Sent via E-mail to: GKowtha@stratusinc.net)

Galvin Kauffman, State Water Resources Control Board, Underground Storage Tank Cleanup Fund (Sent via E-mail to: Galvin.Kauffman@Waterboards.ca.gov)

Caryl Sheehan, State Water Resources Control Board, Underground Storage Tank Cleanup Fund (Sent via E-mail to: Caryl.Sheehan@Waterboards.ca.gov)

Dilan Roe, ACDEH, Chief – Land Water Division (Sent via E-mail to: dilan.roe@acgov.org)

Paresh Khatri, ACDEH, LOP Supervisor (Sent via E-mail to paresh.khatri@acgov.org)

Karel Detterman, ACDEH, Primary Caseworker (Sent via E-mail to: karel.detterman@acgov.org)

GeoTracker, Electronic Case File

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| Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) | REVISION DATE: December 14, 2017 |
| | ISSUE DATE: July 25, 2012 |
| | PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016 |
| SECTION: ACDEH Procedures | SUBJECT: Responsible Party(ies) Legal Requirements / Obligations |

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

| Report Title | Sample Period | PDF Report | GEO_MAPS | Sample ID | Matrix | GEO_Z | GEO_XY | GEO_BORE | GEO_WELL | EDF |
|---|---------------|------------|----------|-----------|--------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 2016 Subsurface Investigation Report | 2016 S1 | ✓ | ✓ | Effluent | SO | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ✓ |
| 2012 Site Assessment Work Plan | 2012 | ✓ | ✓ | | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2010 GW Investigation Report | 2008 Q4 | ✓ | ✓ | SB-10 | W | ✓ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ✓ |
| | | | | SB-10-6 | SO | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ✓ |
| | | | | MW-1 | WG | ✓ | ✓ | ✓ | ✓ | ✓ |
| | | | | SW-1 | W | ✓ | ✓ | ✓ | ✓ | ✓ |

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

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| Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) | REVISION DATE: NA |
| | ISSUE DATE: December 14, 2017 |
| | PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016 |
| SECTION: ACDEH Procedures | SUBJECT: Responsible Party(ies) Legal Requirements / Obligations |

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 the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

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 and include the professional registration stamp, signature, and statement of professional certification. 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

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.