



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

December 28, 2011

Linda Strough  
Donald V. and Linda L. Strough Trust  
2 Sea View Ave.  
Piedmont, CA 94611

W. Bruce Berkovich  
COCRAIG, LTD.  
100 The Embarcadero Penthouse  
San Francisco, CA 94105

Subject: Draft Corrective Action Plan Approval for Fuel Leak Case No. RO0000134 and GeoTracker Global ID T0600101644, Val Strough Chevrolet, 327 34<sup>th</sup> Street, Oakland, CA 94609

Dear Ms. Strough and Mr. Berkovich:

Thank you for the recently submitted document entitled, *Draft Corrective Action Plan Addendum*, dated November 21, 2011, which was prepared by LRM Consulting Inc. for the subject site. Alameda County Environmental Health (ACEH) staff has reviewed the case file including the above-mentioned Draft CAP Addendum for the above-referenced site. The Draft CAP Addendum includes costs for the proposed remedial options that were presented in the Draft CAP. The selected remedial option is dual phase extraction (DPE) for approximately six-months with in-situ chemical oxidation (ISOC) using Regenox™ for three events over a six-week time period.

The proposed scope of work to implement DPE and ISOC injection is acceptable for public comment at this time. Therefore, we request that you distribute the Fact Sheet (attached) to the attached mailing list. Following distribution of the Fact Sheet, please provide verification that the Fact Sheet was distributed by U.S. Mail no later than January 20, 2012.

At the end of the 30-day public comment period, ACEH may request that you address the public comments received. If no public comments are received, ACEH may approve implementation of operation of the DPE and ISOC provided that technical comment 1 below is incorporated during implementation of DPE and ISOC. We request that you address the following comments, perform the requested work, and send us the reports described below.

#### **TECHNICAL COMMENTS**

1. **SPH Generation after ISOC Injection** – During the ISOC pilot test, SPH was mobilized after ISOC was injected. ACEH is concerned that ISOC injections may create SPH in the wells even after the DPE implementation. If this occurs, ACEH requests that DPE is implemented again to remove any SPH that is desorbed from the soil.
2. **Landowner Notification** - Pursuant to Section 25297.15 (a), ACEH, the local agency, shall not consider cleanup or site closure proposals from the primary or active responsible party, issue a closure letter, or make a determination that no further action is required with respect to a site upon which there was an unauthorized release of hazardous substances from an underground storage tank subject to this chapter unless all current record owners of fee title

to the site of the proposed action have been notified of the proposed action by the primary or active responsible party. ACEH is required to notify the primary or active responsible party of their requirement to certify in writing to the local agency that the notification requirement in the above-mentioned regulation has been satisfied and to provide the local agency with a complete mailing list of all record fee title owners.

To satisfy the above-mentioned requirement, please complete the enclosed "List of Landowners Form," and mail it back to ACEH within thirty (30) days from the date of this letter.

### **TECHNICAL REPORT REQUEST**

Please submit technical reports to ACEH (Attention: Barbara Jakub), according to the following schedule:

- **January 16, 2012** – Send out Fact Sheet
- **January 20, 2012** – Verification that Fact Sheet was distributed to the attached mailing list and persons on cc list at the end of this correspondence and Landowner Notification Form
- **January 20, 2012** – Quarterly Monitoring Report (4th Quarter 2011)
- **February 15, 2012** – Public Comment Period Ends
- **April 20, 2012** – Quarterly Monitoring Report (1st Quarter 2012)
- **July 20, 2012** – Quarterly Monitoring Report (2nd Quarter 2012)
- **October 20, 2012** – Quarterly Monitoring Report (3rd Quarter 2012)

Ms. Strough and Mr. Berkovich  
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If you have any questions or concerns regarding this correspondence or your case, please call me at (510) 639-1287 or send me an electronic mail message at [barbara.jakub@acgov.org](mailto:barbara.jakub@acgov.org).

Sincerely,

Barbara J. Jakub, P.G.  
Hazardous Materials Specialist

Enclosure:     Draft Public Notification of Site Remediation  
                  Mailing List for Fact Sheet  
                  List of Landowners Form  
                  Responsible Party(ies) Legal Requirements/Obligations  
                  ACEH Electronic Report Upload (ftp) Instructions

cc: Mehrdad Javaherian, LRM Consulting, Inc., 1534 Plaza Lane, #145, Burlingame, CA 94010 (*Sent via E-mail to [mjavaherian@lrm-consulting.com](mailto:mjavaherian@lrm-consulting.com)*)  
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (*Sent via E-mail to: [lgriffin@oaklandnet.com](mailto:lgriffin@oaklandnet.com)*)  
Donna Drogos, ACEH (*Sent via E-mail to: [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org)*)  
Barbara Jakub, ACEH (*Sent via E-mail to: [barbara.jakub@acgov.org](mailto:barbara.jakub@acgov.org)*)  
GeoTracker, File

Attachment 1

LIST OF LANDOWNERS FORM

County of Alameda
Environmental Health Services
Environmental Protection
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR:

Site Name: Val Strough Chevrolet
Address: 327 34th St.
City, State, Zip: Oakland, CA 94609
Record ID #: RO0000134

Please fill out item 1 if there are multiple site landowners (attach an extra sheet if necessary). If you are the sole site landowner, skip item 1 and fill out item 2.

- 1. In accordance with Section 25297.15(a) of Chapter 6.7 of the California Health & Safety Code, I, (name of primary responsible party), certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site:

Name:
Address:
City, State, Zip:
E-mail Address:

Name:
Address:
City, State, Zip:
E-mail Address:

Name:
Address:

Name:
Address:

Name:
Address:

Name:
Address:

# Attachment 1

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

E-mail Address: \_\_\_\_\_

2. In accordance with Section 25297.15(a) of Chapter 6.7 of the California Health & Safety Code, I \_\_\_\_\_, certify that I am the sole landowner for the above site.

Sincerely,

\_\_\_\_\_

Signature of Primary Responsible Party

Printed Name

Date

E-mail Address



## FACT SHEET ON ENVIRONMENTAL ASSESSMENT

### Val Strough Chevrolet

327 34th Street, Oakland, CA 94609  
Fuel Leak Case No. RO0000134 and  
GeoTracker Global ID T0600101644

#### Site Remediation Summary

This fact sheet has been prepared to inform community members and other interested stakeholders regarding the status of a proposed soil and groundwater cleanup at the former Val Strough Chevrolet located at 327 34th St., Oakland, California. Ms. Linda Strough, the lead responsible party for the fuel leak case is proposing to operate a dual-phase extraction (DPE) system for six-months and then proposing three In-situ oxygen curtain (ISOC) injection events as remediation technologies to cleanup the site. If the ISOC injection mobilizes hydrocarbons from the soil, a second phase of DPE will be implemented.

#### Site Background

The site is located in the Broadway Auto Row and is currently being utilized as the Honda automotive dealership and service center.

Remediation Alternative: Dual-Phase Extraction (DPE)/ In-situ Oxygen Curtain (ISOC) Injection: DPE and ISOC injection are proposed to remediate groundwater contaminated with petroleum hydrocarbons at the site. The plume is located beneath the site at a depth of between 15 to 40 feet below ground surface (bgs). The proposed remediation will extract groundwater and soil vapor from the site for approximately six months. The extracted groundwater and vapors will be sent through granular activated carbon and discharged per permit requirements. Once analytic results indicate that both groundwater and vapor concentrations have stabilized, ISOC will be injected at 26 locations over three events. If after ISOC injection, the groundwater concentrations rise, DPE will be utilized again to remove the available petroleum hydrocarbon mass. The total project is estimated to last between 9 and 12 months. No additional infrastructure is needed to install this system, as the DPE lines have already been installed. A skid-

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FAX (510) 337-9335

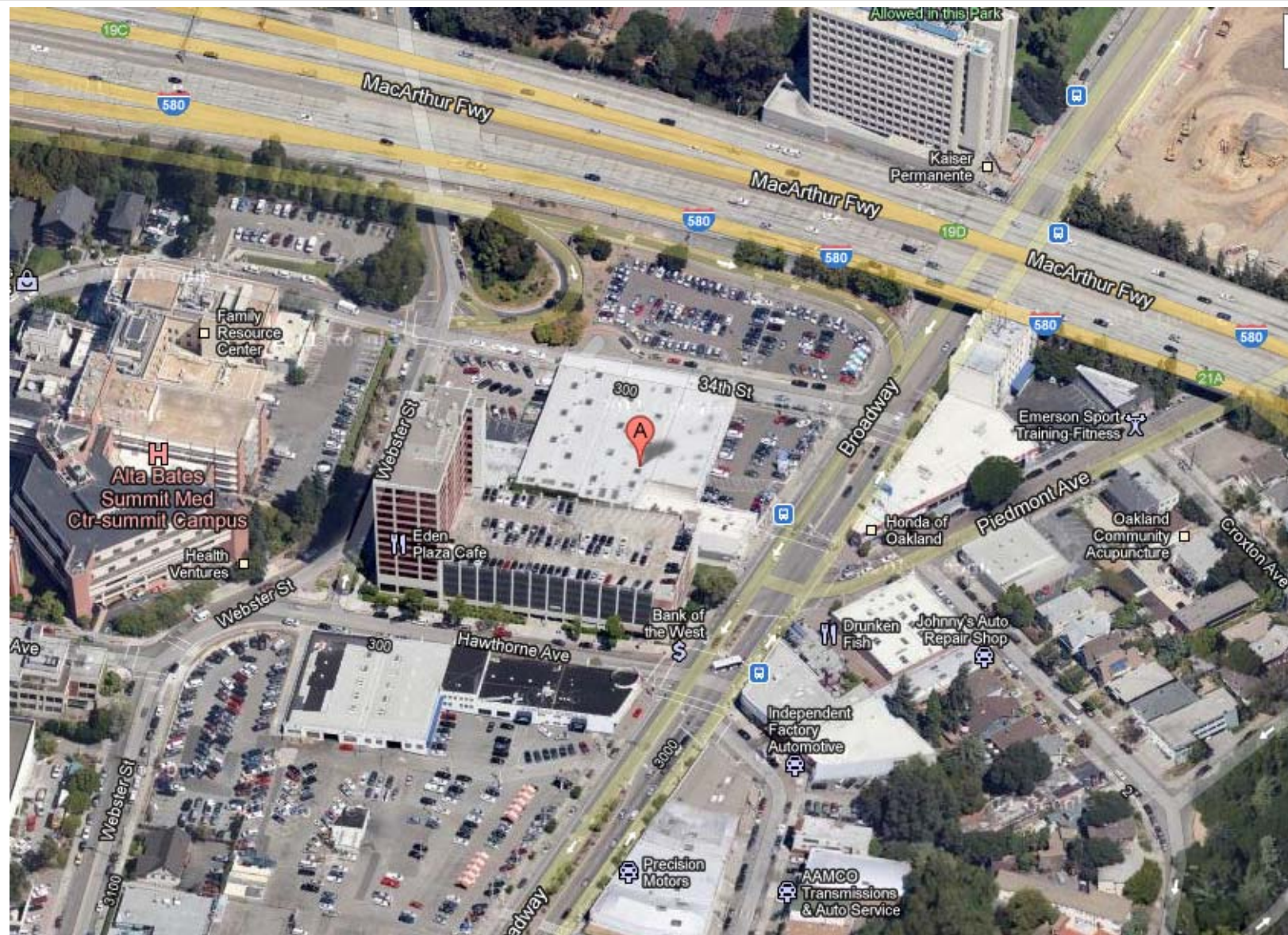
mounted treatment unit will be placed on-site and connected to the piping.

#### Next Step

Ms. Strough is working with Alameda County Environmental Health (ACEH) to implement a soil and groundwater cleanup at the site. The proposed alternative is described in the reports *Draft Corrective Action Plan* dated September 2011 and *Draft Corrective Action Plan Addendum* dated November 21, 2011 prepared by LRM Consulting on behalf of Ms. Strough. The public is invited to review and comment on the proposed cleanup action. The reports are available on ACEH's website (<http://www.acgov.org/aceh/lop/ust.htm>) or the State Water Resources Control Board's GeoTracker website (<http://www.geotracker.waterboards.ca.gov/>). Please send written comments regarding the corrective action to Barbara Jakub at the address below. All written comments received by **February 15, 2012** will be forwarded to the Responsible Party and will be considered and responded to prior to a final determination on the proposed cleanup.

*For Additional information, please contact:*

Barbara Jakub Alameda County Environmental Health 1131 Harbor Bay Parkway, Ste 250 Alameda, CA 94502 Phone: 510-639-1287 E-mail: <a href="mailto:barbara.jakub@acgov.org">barbara.jakub@acgov.org</a>	Mehrdad Javaherian LRM Consulting, Inc. 1534 Plaza Lane, #145 Burlingame, CA 94010 Phone: 415-706-8935 E-mail: <a href="mailto:mjavaherian@lr-consulting.com">mjavaherian@lr-consulting.com</a>
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GWEN SANTOS  
ACC ENVIRONMENTAL CONSULTANTS  
7977 CAPWELL DRIVE, SUITE 100  
OAKLAND, CA 94621

ALTA BATES SUMMIT  
Parcel #: 9-730-11-2  
3012 SUMMIT ST, 3RD FLOOR  
OAKLAND CA 94609

BWMOB LL LLC  
Parcel #: 9-730-4-2  
280 PARK AVE  
NEW YORK NY 10017

EPSTEIN LEONARD & TAGAMI  
Parcel #: 9-703-42  
300 FRANK H OGAWA PLZ  
OAKLAND CA 94612

HAWTHORNE BROADWAY  
Parcel #: 9-705-2-1  
150 LA SALLE AVE  
PIEDMONT CA 94610

SHIRAR GERALD L  
Parcel #: 9-704-1  
7213 PLEASANTS VALLEY RD  
VACAVILLE CA 95688

HEITZINGER ASSOCIATES  
Parcel #: 9-703-1  
PO BOX 489  
ORINDA CA 94563

PREUS DOROTHEA S TR ETAL  
Parcel #: 9-730-1-3  
2 SEA VIEW AVE  
PIEDMONT CA 94611

PREUS DOROTHEA S TR  
Parcel #: 9-733-4-7  
PO BOX 489  
ORINDA CA 94563

JESCO LTD & COCRAIG LTD  
Parcel #: 9-730-1-4  
2 SEA VIEW AVE  
PIEDMONT CA 94611

KIM KI C & CHAE SUSAN K  
Parcel #: 9-703-43  
66 ELYSIAN FIELDS DR  
OAKLAND CA 94605

LEW ELEANOR  
Parcel #: 9-730-8-5  
2588 GEARY BLVD  
SAN FRANCISCO CA 94115

PHILIPPIAN CHURCH  
Parcel #: 9-730-9-4  
3334 WEBSTER ST  
OAKLAND CA 94609



# 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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) 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 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 Spills, Leaks, Investigations, and Cleanup (SLIC) 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 for more information on these requirements ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)).

### PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." 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 6735, 6835, and 7835.1) 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 registered 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 fuel leak case meet this requirement.

### UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later 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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> July 20, 2010
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) 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.**
- **Do not 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. **Documents 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](mailto: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) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
    - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
  - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
  - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - e) 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.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
  - a) Send email to [deh.loptoxic@acgov.org](mailto: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.