

**From:** [Detterman, Karel, Env. Health](#)  
**To:** [Jonathan W. Redding; "Mehrdad Javaherian"](#)  
**Cc:** [Roe, Dilan, Env. Health](#)  
**Subject:** FW: Fuel Leak Case RO134 - Val Strough Chevrolet, Global ID TO600101644, 327 34th Street, Oakland, CA  
**Date:** Monday, March 09, 2015 6:08:08 PM  
**Attachments:** [Attachment 1 and ftpUploadInstructions 2014-05-15.pdf](#)

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Please see below for revised due date.

Thank you,

Karel Detterman, PG  
Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
Direct: 510.567.6708  
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PDF copies of case files can be downloaded at:

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

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**From:** Detterman, Karel, Env. Health  
**Sent:** Monday, March 09, 2015 5:57 PM  
**To:** Jonathan W. Redding; 'Mehrdad Javaherian'  
**Cc:** Roe, Dilan, Env. Health  
**Subject:** Fuel Leak Case RO134 - Val Strough Chevrolet, Global ID TO600101644, 327 34th Street, Oakland, CA

Hello Jonathan and Mehrdad:

Thank you for attending the meeting at our office on Friday March 6, 2015. The purpose of the meeting was to discuss the case status in conjunction with Alameda County Environmental Health's (ACEH) Low Threat Closure Policy (LTCP) Evaluation and identify remaining data gaps on the path to case closure. As discussed during the meeting, two data gaps were identified and are listed below under Technical Comments.

Please submit a Data Gap Work Plan to address the Technical Comments and to expedite review, please e-mail the Data Gap Work Plan in draft form to my attention by March 31, 2015.

#### **TECHNICAL COMMENTS**

1. **LTCP Media Specific Criteria for Vapor Intrusion to Indoor Air** – The LTCP describes conditions, including bioattenuation zones, which if met will assure that exposure to petroleum vapors in indoor air will not pose unacceptable health risks to human occupants of existing or future site buildings, and adjacent parcels. Appendices 1 through 4 of the LTCP criteria illustrate four potential exposure scenarios and describe characteristics and criteria associated with each scenario.
  - a. Our review of the case files indicates that a bioattenuation zone of at least 5 feet to 10 feet thick appears to exist across the site, except in the source area, where data is absent and

secondary source may remain. It is unknown if the excavated soil was off-hauled during the UST removal and disposed of offsite, or pushed back into the UST pit. Consequently, due to the lack of semi-volatile organic concentration (SVOC) and volatile organic concentration (VOC) data from the UST confirmation soil samples and subsequent soil and groundwater investigations, the risk of vapor intrusion to indoor air to onsite and offsite building occupants cannot be assessed. Additionally, naphthalene is one of the contaminants used in the LTCP to assess risk from vapor intrusion to indoor air but naphthalene concentrations in shallow soil are unknown. Please present a strategy in the Data Gap Work Plan to address these data gaps.

Please note, that if direct measurement of soil gas is proposed, ensure that your strategy is consistent with the field sampling protocols described in the Department of Toxic Substances Control's Final Vapor Intrusion Guidance (October 2011). Consistent with the guidance, ACEH requires installation of permanent vapor wells to assess temporal and seasonal variations in soil gas concentrations.

- b. Groundwater Monitoring Event: During the next post-remediation groundwater monitoring event, please sample only wells MW-2, MW-9A, and DPE-1 and analyze groundwater samples from those wells for the full suite of VOCs by EPA Method 8260 and SVOCs by EPA Method 8270 in addition to Method 8015C Total Petroleum Hydrocarbons as gasoline and diesel (TPHg and TPHd) and Methods 8021B for methyl tert-butyl ether (MTBE) and benzene, toluene, ethylbenzene, and xylenes (BTEX).

#### **Technical Report Request**

- **March 31, 2015 ~~April 20, 2015~~** – E-mailed Draft Data Gap Work Plan to [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org)

This report is 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.

Thank you,

Karel Detterman, PG  
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