

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

COLLEEN CHAWLA, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP) FOR
HAZARDOUS MATERIALS RELEASES
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January 17, 2018

Dreyer's Grand Ice Cream
5929 College Avenue
Oakland, CA 94618
Attention: Sven Vetter
(Sent via electronic mail to: sven.vetter@us.nestle.com)

Subject: Meeting Review; Fuel Leak Case No. RO0000153 and GeoTracker Global ID T0600100466
Dreyer's Grand Ice Cream, 5929 College Avenue, Oakland, CA 94618

Dear Mr. Vetter:

Thank you and Michael Calhoun and Peter Bennett, both of Haley & Aldrich, Inc. (HAI), for participating in the meeting with Alameda County Department of Environmental Health (ACDEH) staff held at our offices on January 10, 2018. The focus of the meeting was a review of the recent groundwater monitoring and sampling event conducted on October 31, 2017. An evaluation of the data was discussed from the perspective of the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). It was noted the case does not meet the LTCP media specific criteria for Groundwater, Vapor Intrusion to Indoor Air (VIIA), and Direct Contact.

The media specific Groundwater criteria are not met as the contaminant plume is undefined and sensitive receptors have not been identified. The media specific VIIA criteria are not met as the concentration of benzene in groundwater is above the 100 micrograms per liter (ug/L) threshold identified in the LTCP for sites with a bioattenuation zone of less than 10 feet, sensitive receptors have not been identified, and no soil vapor samples collected. The media specific Direct Contact criteria are not met as no samples appear to have been collected in the 0- to 5-foot interval.

ACDEH presented a path forward to meet the LTCP criteria. Prior to and in order to refine the scope of additional fieldwork, ACDEH requests the following tasks be performed for presentation at our next meeting tentatively scheduled for April 18th, 2018 at 1:00 PM at the site.

TECHNICAL COMMENTS

1. Contaminant Plume Map –

Please prepare a plume map based on the historic groundwater flow directions and using the average, 90th percentile, and maximum plume length for total petroleum hydrocarbons as gasoline (TPHg) presented in the SWRCBs LTCP *Technical Justification for Groundwater Plume Length, Indicator Constituents, Concentrations, Buffer Distances (Separation Distances) to Receptors* (LTCP Guidance; SWRCB 2012). Please plot monitoring well locations and grab groundwater data on the Contaminant Plume Map.

2. Preferential Pathway and Sensitive Receptor Study –

Using the Contaminant Plume map generated from Technical Comment 1, above, please perform the following tasks and plot the data on the map:

- I. **Utility Survey** – An evaluation of all existing subsurface utility lines and trenches including sewers, electrical, fiber optic cable, cable, water, storm drains, trench backfill, etc. within and near the site and plume area(s) defined by the Contaminant Plume Map generated from Technical Comment 1.
- II. **Well Survey** – Identification of all active, inactive, standby, decommissioned and abandoned beneficial use wells including irrigation, water supply, industrial, dewatering, and cathodic protection wells within a 2,000-foot radius of the subject site. Please inspect all available Well Completion Reports filed with the Department of Water Resources and Alameda County Public Works Agency in your survey, and perform a background study of the historical land uses of the site and properties in the vicinity of the site.
- III. **Land Uses and Exposure Scenarios** – Land Uses and Exposure Scenarios on site and adjacent properties. Identification of beneficial resources (e.g., groundwater classification, wetlands, surface water bodies, natural resources, etc.), and exposure pathways, and potential threats to sensitive receptors.
- IV. **Building Evaluation** – Identification of existing and historic building foundational elements that can link potential receptors to the contaminant plumes and/or act as preferential pathways for contaminant migration. Include the age, type, and depth of element (e.g., slab on grade, grade beam, piers, basements, etc.), and associated engineering control systems (sumps, curb-side discharge, etc.). Please tabulate the building data and reference the results of the building evaluation for structures within and in the vicinity of the contaminant plume defined by the on the Contaminant Plume Map generated from Technical Comment 1.
- V. **Geologic** – Subsurface soil conditions, buried stream channels, and physical features including topographical features (e.g., hills, gradients, surface vegetation, or pavement) and surface water features (e.g. routes of drainage ditches, links to water bodies- e.g. storm water discharge outlets).

3. Data Presentation

- I. **Soil** – Please prepare a comprehensive data summary table presenting analytical reporting for all soil samples recovered to date. Use strike-through for samples confirmed to be over excavated. Shade elements that are suspected to have been over excavated. Identify the collection depth interval for the samples.
- II. **Grab- Groundwater** – Please prepare a comprehensive data summary table presenting analytical reporting for all grab groundwater (GGW) samples recovered to date. Identify the collection depth interval for the samples if appropriate.
- III. **Groundwater Summary Table** – Please prepare a comprehensive data summary table presenting analytical reporting for all monitoring well groundwater samples recovered to date. Please include a depth-to-water (dtw) column to aid in the evaluation of concentration trends with dtw.
- IV. **Groundwater Hydrographs** – Please prepare hydrographs plotting dtw and chemical concentrations of selected chemicals of potential concern (COPC) with time. ACDEH requests the scaling adjusted to provide an adequate visual relationship for the parameters displayed.

4. Groundwater Monitoring/Sampling Event

ACDEH requests an additional groundwater monitoring and sampling event be conducted by late March. Please schedule the event after sufficient rainfall has occurred in order to recover

groundwater samples from the monitoring wells at a period of high water. Please include the results summary in the data summary table requested in Technical Comment 3(III) above.

Based on the findings of the most recent groundwater monitoring event, ACDEH is of the opinion the scope of analysis for the monitoring event may be reduced to include total petroleum hydrocarbons (TPH) as gasoline (TPHg), TPH as diesel (TPHd), benzene, toluene, ethylbenzene, and xylenes (collectively BTEX), and naphthalene.

NEXT STEPS

Please compile the data requested above and submit to ACDEH via email correspondence one week prior to the on-site meeting listed below:

- **April 18, 2018** On-site meeting at 1:00 PM to review findings and update path forward toward closure

Should you have any questions, please contact me at (510) 567 - 6764 or send me an electronic mail message at keith.nowell@acgov.org.

Sincerely,

Keith Nowell, PG, CHG
Hazardous Materials Specialist

cc: Peter Bennett, Haley & Aldrich, Inc., 1956 Webster Street, Suite 300, Oakland, CA 94612 (*Sent via electronic mail to: PBennett@haleyaldrich.com*)

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Geotracker