

**From:** [Detterman, Karel, Env. Health](#)  
**To:** [pdking0000@aol.com](mailto:pdking0000@aol.com); [Keith Simas](#)  
**Cc:** [Roe, Dilan, Env. Health](#)  
**Subject:** Fuel Leak Case RO191 and Geotracker Global ID T0600101803 - Xtra Oil Company, 1701 Park Street, Alameda  
**Date:** Wednesday, August 06, 2014 4:56:49 PM

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Gentlemen:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *In Situ Chemical Oxidation (ISCO) Feasibility Test Work Plan* (Work Plan) dated February 7, 2014 and the *ISCO Feasibility Test Work Plan Addendum* (Addendum) dated June 9, 2014, prepared and submitted on your behalf by P&D Environmental, Inc. (P&D). The work plan was submitted in response to re-evaluation of site conditions with respect to the Low Threat Closure Policy (LTCP). Thank you for submitting the Work Plan and the Addendum.

Based on ACEH staff review of the Work Plan and Addendum, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org)) prior to the start of field activities.

#### **TECHNICAL COMMENTS**

- 1. Length of Ozone Pilot Test:** ACEH approves of operating the pilot test for one month, followed by a rebound period with collection of groundwater data to document and assess rebound.
- 2. Additional Groundwater Analysis:** At a nearby fuel leak case located at 1435 Webster Street, Alameda (RO0000193,) groundwater analysis indicated increasing concentrations of hexavalent chromium following injection of catalyzed hydrogen peroxide. Please additionally analyze the baseline groundwater samples for hexavalent chromium. If the results of the pilot test indicate generation of hexavalent chromium in excess of environmental screening levels, please include recommendations as to the best course of action, if ozone injection appears to be a plausible remedial option.
- 3. Groundwater Monitoring and Sampling:** Please implement quarterly monitoring and sampling (including additional analysis for hexavalent chromium) for six months following the one month-long ozone pilot test to monitor groundwater quality rebound and seasonal changes.
- 4. Monthly Progress Reports:** As described in the Addendum, please submit monthly progress letter reports with figures and tables for a total of three months after the conclusion of the 30 day pilot test.

#### **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, in accordance with the following specified file naming convention and schedule:

- **September 19, 2014** – Third Quarter and Baseline Groundwater Monitoring and Sampling Report  
File to be named: RO191\_GWM\_R\_YYYY-MM-DD
- **October 6, 2014** – Pilot Test Evaluation Report (Interim Remediation Results)  
File to be named: RO191\_IR\_R\_YYYY-MM-DD
- **December 19, 2014** – Fourth Quarter Groundwater Monitoring and Sampling Report

File to be named: RO191\_GWM\_R\_YYYY-MM-DD

- **Monthly Progress Reports** - Due 30 Days after Commencement of the Pilot Test for a Total of Three Months

Files to be named: RO191\_STAT\_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.

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>