

From: Roe, Dilan, Env. Health
To: [Walter T. Sprague \(wsprague@pcandf.com\)](mailto:wsprague@pcandf.com)
Cc: ["Dennis Dettloff"; Nowell, Keith, Env. Health](#)
Bcc: [Drogos, Donna, Env. Health](#)
Date: Friday, February 14, 2014 5:08:00 PM

Dear Mr. Sprague,

Alameda County Environmental Health (ACEH) staff has reviewed the Corrective Action Plan (CAP) dated November 22, 2013 prepared by Antea Group on your behalf in conjunction with the case files and the State water Resources Control Board's Low Threat Closure Policy. Based on the evaluation and comparison of three alternatives (Soil Excavation and Off-Site Disposal with Oxygen Release Compound (ORC) Amendment, Dual Phase Extraction, and In-Situ Chemical Oxidation) and taking into consideration the opportunity to conduct work concurrently with a planned site renovation in the Spring of 2014, Antea Group recommends implementing soil source excavation and ORC to help reduce remaining petroleum hydrocarbon and methyl tertiary butyl ether (MTBE) impact to the groundwater beneath and down-gradient of the site.

Based on our review, ACEH conditionally concurs with the proposed correction action plan concept presented in the CAP provided you address the technical comments and send us the reports listed below.

Technical Comments

1. **Remedial Design and Implementation Plan (RDIP).** Please prepare a RDIP providing details on the proposed soil excavation and ORC amendment activities described in the CAP. Items to address include but are not limited to the following:
 - Construction sequencing and schedule of excavation, site demolition and new station construction;
 - Plans of the existing and proposed redevelopment;
 - Groundwater monitoring well destruction, shallow monitoring well replacement, and protocols for protection of remaining onsite wells;
 - On-site utility encroachment;
 - Shoring and method of securing excavation during non-working hours;
 - Dewatering, including storage location, profiling, and disposal;
 - Contingency for prevention of storm water infiltration into excavation(s);
 - Dust suppression and odor control;

- Calculation of ORC quantity for application,
 - Soil sampling, including sampling density of excavation and stockpiles, staggering sidewall confirmation sample collect to in the 0- to 5 feet below the ground surface (bgs) and the 5- to 10-foot bgs interval, excavation bottom sample density, sampling beneath existing piping runs and dispenser islands, and beneath the car wash structure;
 - Disposal of excavation derived wastes, including estimated number of trucks, traffic control, pedestrian safety procedures, truck decontamination, site entry/ departure aprons, disposal facility identification;
 - Soil stockpile placement and best management plans for stockpile(s);
2. **Public Participation** – Public participation is a requirement for the Corrective Action Plan process. The purpose of public participation is to facilitate communication and coordination with stakeholders potentially affected by or concerned with the proposed corrective actions at the site. Therefore you are required to notify affected stakeholders who live or own property in the surrounding area of the proposed corrective actions described in the Draft FS/CAP through the mailing of a Fact Sheet.

ACEH requests that you revise the draft Fact Sheet dated December 6, 2013 to remove reference to Alternative #2 In Situ Chemical Oxidation. Please submit the revised draft Fact Sheet (in MS word format) via email correspondence to ACEH for review (Attn: Keith Nowell) by the date identified in the Technical Report section below. ACEH will review the draft Fact Sheet and provide a final Fact sheet and distribution list for mailing to property owners and tenants in the vicinity of the site. Following distribution of the Fact Sheet, please provide your personal certification by e-mail or letter, that the Fact Sheet was distributed by U.S. Mail to the attached mailing by the date identified in the Technical Report section below.

Public comments on the proposed remediation will be accepted for a period of thirty days. Following the thirty day public comment period, and after the comments received (if any) have been addressed and the Corrective Action Implementation Plan approved by ACEH, the corrective actions may be implemented.

Technical Report Request

Please submit the following technical reports to the ACEH ftp site (Attention: Keith Nowell), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **February 28, 2014**– Draft Fact Sheet (Word document)
- **March 14, 2014**– Certification of Fact Sheet Distribution (File name: RO0000219_CAPP_CERT_L_yyyy-mm-dd)
- **April 11, 2014** – Remedial Design & Implementation Plan (File name: RO0000219_RDIP_R_yyyy-mm-dd)

Thank you for your cooperation. ACEH looks forward to working with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your

case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Respectfully,

Keith Nowell

Dilan Roe, P.E.

Program Manager - Land Use & Local Oversight Program

Alameda County Environmental Health

1131 Harbor Bay Parkway

Alameda, CA 94502

510.567.6767; Ext. 36767

QIC: 30440

dilan.roe@acgov.org

PDF copies of case files can be reviewed/downloaded at:

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