

Nowell, Keith, Env. Health

From: Nowell, Keith, Env. Health
Sent: Friday, August 15, 2014 3:59 PM
To: 'wannetta4414@yahoo.com'; 'louisbadertscher@gmail.com'
Cc: 'Paul.King@rgaenv.com'; Roe, Dilan, Env. Health; 'CharleneNeely@aol.com'
Subject: Fuel Leak Case RO280- Scooter Wilson, 3600 MacArthur Blvd, Oakland

Dear Ms. Hall and Mr. Badertscher:

Alameda County Environmental Health (ACEH) staff has reviewed the case file to determine if the site is eligible for closure as a low risk site under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on the review, ACEH has modified its position outlined in ACEHs April 18, 2014 Directive.

Technical Comments

- **Data Trends:** Based on its most recent review, it is the opinion of ACEH that it is premature to perform a soil vapor study at this time as the most recent groundwater monitoring event, conducted on October 24, 2013, has demonstrated a significant reduction of petroleum hydrocarbon volatiles since the penultimate event conducted on May 6, 2008. In the intervening 4-1/2 years, it appears the benzene concentrations in groundwater monitoring well MW-1, reported at 420 mg/L in 2008, and recently been reported at 2.9 mg/L, do not support performing a soil gas investigation. However, a concentration trend analysis is not appropriate due to the lack of data between 2008 and 2013. Therefore, at this time, ACEH requests that an additional round of groundwater sampling and analysis be performed to validate the 2013 data.
- **Sensitive Receptors:** Please evaluate contaminant plume lengths for both total petroleum hydrocarbons as gasoline (TPHg) and benzene for the projected plume boundaries, using the SWRCBs LTCP *Technical Justification for Groundwater Plume Length, Indicator Constituents, Concentrations, Buffer Distances (Separation Distances) to Receptors* (LTCP Guidance; SWRCB 2012). Please prepare a figure using an aerial photographic base showing the average, 90th percentile, and maximum TPHg and benzene plume lengths as circles whose center is at the location of the station building. Include on the figure all sensitive receptors identified within 2,000 feet of the site, including wells and surface water bodies. Wells depicted on the figure should include results from both Alameda County Public Works Agency (ACPWA) and Department of Water Resources (DWR) database searches.
- **Preferential Pathways:** Groundwater at the site has been reported as shallow as 0.91-foot below the ground surface (bgs). The variable direction of groundwater flow at the site places the catch basin located adjacent to the northeast corner of MacArthur Boulevard and Magee Avenue periodically down gradient of the former UST pit. Please address the potential introduction of contaminated groundwater to the storm drain system.
- **Primary Source Removal:** As outlined in the Data Trends section above, present petroleum hydrocarbon concentrations reported in groundwater at the site suggest that product piping, if present, is not an active primary source continuing to introduce contaminants into the environment. Therefore, at this time, ACEH does not recommend a product piping evaluation at this time.
- **Chevron Boring B-15:** ACEH has reviewed reported concentrations of TPHg and total petroleum hydrocarbons as diesel (TPHd) in the Chevron boring B-15 located across MacArthur Boulevard from the subject site. ACEH is of the opinion the TPHg and TPHd concentrations of 17,000 mg/L and 40,000 mg/L, respectively, found in boring B-15 are not consistent with the reported on site concentrations and are unlikely a result of the Scooter Wilson release. Hence, ACEH is of the opinion that an investigation in MacArthur Boulevard is not warranted at this time.

Technical Report Request

We request that you address the aforementioned technical comments, perform the proposed work, and send us the technical reports requested below. Please upload 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:

- **October 17, 2014- Updated Site Conceptual Model and Groundwater Monitoring Report** (file name: RO0000280_SCM_SWI_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

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

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