



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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August 3, 2016

Mr. Seung Lee  
German Autocraft  
301 East 14<sup>th</sup> Street  
San Leandro, CA 94577

William Andrade II  
Address Unknown

Sephen & Elizabeth Wilhelm  
Address Unknown

Subject: Pilot Test Approval of Ozone Injection System; Fuel Leak Case No. RO0000302 and Geotracker Global ID T0600100639, German Autocraft, 301 East 14<sup>th</sup> Street, San Leandro, CA 94577-1713

Dear Mr. Lee:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file for the above referenced site including the *Corrective Action Work Plan*, dated June 13, 2016 and the *Quarterly Groundwater Monitoring Report – Second Quarter 2016*, dated July 14, 2016. The reports were prepared and submitted on your behalf by Stratus Environmental, Inc (Stratus). Thank you for submitting the reports.

The reports indicate the continued presence of elevated groundwater concentrations of Total Petroleum Hydrocarbons as gasoline (TPHg) in well MW-15 that the *Technical Justification for Groundwater Media-Specific Criteria* (April 24, 2013) for the Low Threat Closure Policy (LTCP) indicates is indirect evidence of residual Light Non-Aqueous Phase Liquids (LNAPL) in the subsurface. The purpose of conducting the quarterly groundwater monitoring over the past year was determine if the LNAPL concentrations would dissipate over a relatively brief period of time; they have not. As a consequence, the referenced *Corrective Action Work Plan* has proposed an ozone injection system at the site for the purpose of oxidizing residual Total Petroleum Hydrocarbons as gasoline (TPHg), and related chemicals, in soil and groundwater in order to reduce TPHg, and related chemical, concentrations in groundwater.

Based on ACDEH staff review of the work plan, 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 a work plan 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: [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org)) prior to the start of field activities.

### **TECHNICAL COMMENTS**

1. **Work Plan Modifications** – The referenced work plan proposes a series of actions with which ACDEH is in general agreement of undertaking; however, ACDEH requests several modifications to the approach. Please submit a report by the date identified below.

- a. **Injection Well Locations and Radius Of Influence** – Based on the distribution of elevated Total Petroleum Hydrocarbons as gasoline (TPHg; apparently approximately spanning the area between MW-15 and MW-2) ACDEH is in general agreement that the approximate locations of proposed injection wells appears appropriate; however, a Radius of Influence (ROI) for the wells has not been established. The spacing of the injection wells relative to existing onsite monitoring wells appears adequate to determine the ROI of the wells. Additionally, the collection of the proposed soil samples from the injection well bores will help determine the usefulness of an injection well at the proposed locations. Therefore, it appears

appropriate to approve the installation of the injection wells as a pilot test, determine the ROI during system startup and pilot testing, and assess the need for additional injection wells, if any, based upon the ROI results.

- b. Assess Need for Additional Bore** – The extent of elevated concentrations of TPHg in groundwater to the north and east of MW-15 has not been established towards Garcia Avenue and towards East 14<sup>th</sup> Street. The location of injection well IW-7 is likely to provide additional onsite insight into the extent of elevated soil and groundwater concentrations towards Garcia Avenue; however, an additional delineation soil bore / injection well may be needed towards East 14<sup>th</sup> Street to provide delineation of the soil and groundwater plume. Please evaluate the need for this location in the pilot test evaluation report requested below.
  - c. Grab Groundwater Samples** – In an effort to determine approximate contaminant concentrations in groundwater at the proposed well locations, and to help support the need for an injection well, it seems reasonable to request the collection of grab groundwater from the injection wells at installation. ACDEH understands that grab groundwater concentrations tend to bias high; however, the relative TPHg concentrations are expected to provide insight into the plume dimensions in near source areas.
  - d. Groundwater Monitoring Interval** – ACDEH is in agreement that a quarterly monitoring interval is appropriate while the ozone injection system is operational and during pilot testing.
  - e. Hexavalent Chromium Analysis** – The referenced report indicates that hexavalent chromium will be included in the analytical suite due to the potential for ozone systems to generate the compound. ACDEH additionally requests the collection of baseline hexavalent chromium concentrations prior to system startup in order to determine its natural presence and to track any production during system operation.
  - f. Soil Sample Selection Protocols** – The referenced report states that soil samples will be collected at predefined depth intervals (2.5 or 5 foot intervals) during installation of the injection wells. Please ensure soil samples are collected within the 0 to 5 and the 5 to 10 foot interval in conformance with the Low-Threat Closure Policy (LTCP). Additionally, please ensure that the samples are collected at signs of contamination (staining, odor, PID responses, and etc.), and at significant changes in lithology, rather than at predefined depth intervals in order to adequately characterize soil in the subsurface at the selected locations and potentially to determine the usefulness of an injection well at the location.
- 2. Corrective Actions** - Please be aware that the proposed scope of work has been approved as a pilot test only and that prior to implementation, corrective actions require a 30-day public comment period. Copies of standardized public participation announcements have previously been forwarded separately and a draft copy, in MS Word, is requested to be returned by the date identified below. A part of the implementation plan that must be available for public comment must include the location of the remedial system compound relative to residential buildings, system layout, the hours of operation, and the loudness of the system. Review of the *Draft Feasibility Study / Corrective Action Plan*, dated December 5, 2012, and prepared by Stratus, indicates that at a minimum the corrective action goals require an update as they were defined to Environmental Screening Levels (ESLs) promulgated by the San Francisco Regional Water Quality Control Board (RWQCB), rather than to goals defined under the current standard of the LTCP.
  - 3. Well Survey** – Review of the case in Geotracker indicates that the site is not in compliance with State requirements for Geotracker. In accordance with California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, all wells associated with an environmental case are required to be surveyed to Geotracker survey standards and the coordinates are to be uploaded to Geotracker. At this juncture with the planned installation of the injection wells, it appears an appropriate time to bring the site into compliance with State regulations. Please be aware that compliance is required by the State and is tied to reimbursement funding by the UST Cleanup Fund. Please see Attachment 1 for limited additional details, and the state GeoTracker website for full details.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACDEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below, according to the following schedule:

- **August 12, 2016** – First Semi-Annual 2016 Groundwater Monitoring Report  
File to be named: RO302\_GWM\_R\_YYYY-mm-dd
- **October 28, 2016** – Pilot Test and Corrective Action Implementation Plan, and Draft Public Notification Document (in MS Word); File to be named: RO302\_IR\_R\_YYYY-mm-dd
- **October 28, 2016** – Draft Public Notification Document (in MS Word)  
Please email directly to your case worker
- **November 30, 2016** – Third Quarter 2016 Groundwater Monitoring Report  
File to be named: RO302\_GWM\_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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address does not appear on the cover page of this notification, ACDEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org).

Sincerely,

Mark E. Detterman, PG, CEG  
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations  
Electronic Report Upload (ftp) Instructions

cc: Scott Bittinger, Stratus Environmental, Inc, 3330 Cameron Park Drive, Suite 550, Cameron Park, CA 95682; (Sent via electronic mail to: [sbittinger@stratusinc.net](mailto:sbittinger@stratusinc.net))

Trevor Hartwell, Stratus Environmental, Inc, 3330 Cameron Park Drive, Suite 550, Cameron Park, CA 95682; (Sent via electronic mail to: [thartwell@stratusinc.net](mailto:thartwell@stratusinc.net))

Dilan Roe, ACDEH, (Sent via electronic mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))  
Mark Detterman, ACDEH, (Sent via electronic mail to: [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))  
Geotracker, Electronic File

## Attachment 1

### Responsible Party(ies) Legal Requirements / Obligations

#### REPORT REQUESTS

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.

#### ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) GeoTracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)).

#### PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

#### PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

#### UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

#### AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> May 15, 2014
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

## REQUIREMENTS

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- **Signature pages and perjury statements must be included and have either original or electronic signature.**
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

RO#\_Report Name\_Year-Month-Date (e.g., RO#5555\_WorkPlan\_2005-06-14)

## Submission Instructions

- 1) Obtain User Name and Password
  - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
    - i) Send an e-mail to [deh.loptoxic@acgov.org](mailto:deh.loptoxic@acgov.org)
  - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses**, and the **Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
  - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
    - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
  - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
  - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
  - a) Send email to [deh.loptoxic@acgov.org](mailto:deh.loptoxic@acgov.org) notify us that you have placed a report on our ftp site.
  - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
  - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
  - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.