

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

COLLEEN CHAWLA, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY
ALAMEDA, CA 94502
(510) 567-6700
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January 2, 2018

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

William Andrade II
Address Unknown

Sephen & Elizabeth Wilhelm
Address Unknown

Subject: Corrective Action Implementation Plan Request; Fuel Leak Case No. RO0000302 and Geotracker Global ID T0600100639, German Autocraft, 301 East 14th Street, San Leandro, CA 94577-1713

Dear Responsible Parties:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file for the above referenced site including the *Well Installation and Site Assessment report*, dated September 11, 2017, the *Report of Results for Ozone Injection Remediation Pilot Test*, dated September 14, 2017, and the *Quarterly Groundwater Monitoring Report – Third Quarter 2017*, dated November 6, 2017. The reports were prepared and submitted on your behalf by Stratus Environmental, Inc (Stratus). Thank you for submitting the reports. ACDEH also met with your consultants on December 7, 2017, to discuss the site and a path to closure for the case.

As you are aware, ACDEH has previously evaluated site data to determine if the site can be closed under the State Water Resources Control Board's (SWRCBs) Low-Threat Closure Policy (LTCP). As detailed in previous directive letters, we have determined that the site continues to fail to meet the Media-Specific Criteria for Groundwater.

As a result of the meeting, and based on ACDEH staff review of the case file, we request that you address the following technical comments and send us the reports described below.

TECHNICAL COMMENTS

1. **FS / CAP Implementation Plan** – ACDEH is in general agreement that the proposed ozone injection wells may be effective in remediating onsite groundwater contamination and in mitigating the exposure to groundwater at the downgradient water supply well (141 Farrelly), reported to be screened between 25 to 65 feet below grade surface (bgs); or in other words screened across the same contaminated water-bearing zone as the subject site. As previously discussed, onsite soil and groundwater concentrations are indicative of the presence of non-mobile Light Non Aqueous Phased Liquids (LNAPL) in soil as detailed in technical papers that support the LTCP (See the table on page 4 of the *Technical Justification for Vapor Intrusion Media-Specific Criteria* and the discussion of immobile LNAPL on page 2 of the *Technical Justification for Groundwater Media-Specific Criteria*, August 2012, State Water Resources Control Board). Residual soil contamination beneath the site is documented to be present at concentrations up to 12,000 milligrams per kilogram (mg/kg) Total Petroleum Hydrocarbons as Gasoline (TPHg) under submerged conditions at several locations in the vicinity of the former UST. Additionally, groundwater well MW-15, recently contained concentrations of Total Petroleum Hydrocarbons as gasoline (TPHg) up to 19,000 micrograms per liter (μ /L) and 73 μ /L benzene. The well also provides poor definition of the northeastern extent of the groundwater plume onsite.

As discussed in the meeting, ACDEH requests a Corrective Action Implementation Plan (CAIP) that evaluates additional corrective action tools in the event the ozone injection wells are not effective in remediating residual soil contamination. ACDEH requests that the CAIP include appropriate pilot

testing for potential alternative proposed remedial methods at the site such as Dual Phased Extraction (DPE), and the installation of one or more wells in order to monitor the progress close to the site, as the closest downgradient well is approximately 270 feet downgradient. Due to the change in groundwater gradient direction, as documented by the historic contaminant plume path towards the 141 Farrelly well, and the current westward directed groundwater flow direction, please also be aware that the extent of the plume downgradient of well MW-12 has not been defined. In the requested ICAP, please present implementation details including:

- Design drawings and specifications for the ozone injection system including installation details for the wells proposed in the Draft FS / CAP
- Operation and maintenance plans
- System optimization, performance metrics and proposed reporting including submittal of monthly progress reports
- Post-remediation monitoring and verification plans with proposed strategy for collecting groundwater, soil and soil vapor monitoring and confirmation samples. This may require the installation of two replacement onsite groundwater monitoring wells.
- An updated detailed cost estimate for the proposed work
- Updated cleanup goals utilizing the LTCP screening levels for petroleum hydrocarbons
- Implementation schedule with milestone dates
- A strategy for supplementing limited soil data within the upper 10 feet of soil at the site during ozone well installation, to fulfill the requirements for the LTCP Media Specific Criteria for Direct Contact and Outdoor Air.

Please note, implementation of the CAP is contingent on submittal and ACDEH acceptance of CAIP.

- 2. Fact Sheet** - Public participation is a requirement for the CAP process. Therefore, we request that you submit a draft Fact Sheet for ACDEH review as identified below. Example fact sheets can be forwarded under separate cover. Upon ACDEH approval of both the CAP Implementation Plan and the Fact Sheet, affected members of the public who live or own property in the surrounding area are to be notified. Public comments on the proposed remediation will be accepted for a 30-day period.
- 3. Semi-Annual Groundwater Monitoring** – It appears appropriate to move the site towards a semi-annual groundwater monitoring interval. In order to capture potential worst-case contaminant concentrations, please monitor and sample wells in the months of May and November (Second and Fourth Quarters), and submit reports by the dates identified below. Upon implementation of the CAP, the interval can change as needed.

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:

- **March 9, 2018** – Corrective Action Implementation Plan
File to be named: RO302_CAIP_R_yyyy-mm-dd
- **March 9, 2018** – Draft Public Notification Document (in MS Word)
Please email directly to your case worker
- **July 13, 2018** – Second Quarter 2018 Semi-Annual Groundwater Monitoring Report
File to be named: RO302_GWM_R_yyyy-mm-dd

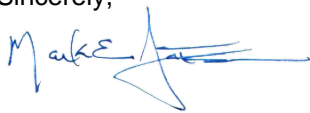
- **January 25, 2019** – Fourth Quarter 2018 Semi-Annual Groundwater Monitoring Report
File to be named: RO302_GWM_R_YYYY-MM-DD

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.

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: Gowri Kowtha, Stratus Environmental, Inc, 3330 Cameron Park Drive, Suite 550, Cameron Park, CA 95682; (Sent via electronic mail to: gkowtha@stratusinc.net)

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

Dilan Roe, ACDEH, (Sent via electronic mail to: dilan.roe@acgov.org)

Paresh Khatri, ACDEH; (Sent via electronic mail to: paresh.khatri@acgov.org)

Mark Detterman, ACDEH, (Sent via electronic mail to: mark.detterman@acgov.org)

Electronic File; GeoTracker

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) 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 licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.