

From: [Detterman, Karel, Env. Health](#)
To: "Hawk, Christopher (Penske)"
Cc: [Roe, Dilan, Env. Health](#); [Hey, Eva](#)
Subject: Fuel Leak Case RO354 - Hertz-Penske, Geotracker Global ID TO600101062, 725 Julie Ann Way, Oakland, CA 94621
Date: Thursday, November 06, 2014 5:17:25 PM

Hello Chris:

Alameda County Environmental Health (ACEH) staff has reviewed the case file, including the October 8, 2014 *Addendum to No Further Action Request Report January 14, 2014* (Addendum) prepared on your behalf by Stantec Consulting Services, Inc. (Stantec). Thank you for submitting the Addendum. The State Water Resources Control Board (SWRCB) adopted the Low Threat Underground Storage Tank Case Closure Policy (LTCP) in August 2012 for the purpose of establishing consistent statewide case closure criteria for low-threat petroleum Underground Storage Tank (UST) sites.

The SWRCB and ACEH staff participated in a conference call on November 5, 2014 to discuss the path to closure. Based on the call, all parties agreed that additional data collection was prudent. Therefore, at this juncture, please submit a Data Gap Work Plan to address the following Technical Comment. To expedite review, please e-mail the draft Data Gap Work Plan to my attention by 11/21/2014. I will send comments for finalization and uploading of the Work Plan per the Technical Report Request schedule below.

TECHNICAL COMMENT

1. **LTCP Media Specific Criteria for Groundwater:** ACEH's research indicates that the Alameda County Flood Control drainage channel at the site's western boundary is a manmade earth-lined channel. The groundwater flow direction at the site varies from west-northwest to southwest. Grab groundwater samples collected from soil borings SB-1 through SB-8 in 2009, nine years after Fenton's Reagent Injection, indicated elevated residual Total Petroleum Hydrocarbon as gasoline (TPHg) and TPH diesel (TPHd) concentrations. Concentrations of TPHg up to 300,000 micrograms per liter (ug/L) and up to 4,000,000 ug/L TPHd were found in SB-5 located 42 feet from the drainage channel. Free product was noted on the chain of custody for grab groundwater samples from SB-1, SB-2, SB-3, SB-4, SB-5, and SB-6. ACEH is concerned that residual TPHg and TPHd in shallow groundwater may be migrating through the drainage channel's earthen bank and into the San Francisco Bay.

To address ACEH's concern, please prepare a Data Gap Investigation Work Plan to characterize the shallow groundwater quality along the western site boundary in the vicinity of MW-7R, MW-8, SB-3, and SB-5. ACEH requests drilling a minimum of four soil borings in a transect, parallel to and within 10-20 feet of the drainage channel. Each bore should be advanced to a depth of 10 feet below ground surface (bgs) or to groundwater and should be evenly spaced 30' from each other.

ACEH requests collection and analysis of grab groundwater samples from each of the soil borings within 1 to 2 hours of low tide. Each groundwater sample should be analyzed for total dissolved solids, TPHg and TPH-d with silica gel cleanup by appropriate EPA Methods with adequately low laboratory detection limits. Please log the lithology of each boring and note visual indicators of contamination including, but not limited to, stained interval(s), areas with high PID readings, and free-product.

Technical Report Request

To expedite review, please e-mail the draft Data Gap Work Plan and a figure indicating the proposed bore locations to my attention.

- **November 21, 2014** – E-mailed Draft Data Gap Work Plan to karel.detterman@acgov.org

Upon comment, revision, and approval, please finalize and upload the work plan 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:

- **Thirty days After Draft Work Plan Approval** - Data Gap Investigation Work Plan
File to be named: RO354_WP_R_yyyy-mm-dd

This report is 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,

Karel Detterman, PG
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
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PDF copies of case files can be downloaded at:

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

From: Hawk, Christopher (Penske) [mailto:Christopher.Hawk@penske.com]
Sent: Monday, October 27, 2014 12:58 PM
To: Detterman, Karel, Env. Health
Cc: Roe, Dilan, Env. Health; Hey, Eva
Subject: RE: RO354: ACCEPTED DOCUMENT ON FTP SITE

Hi Karel,

Penske/Stantec believes our recently submitted NFAR Addendum sufficiently addresses the County's comments to our closure request. Please confirm when you have reviewed the addendum and concur. We're anxious to put this one to bed.

Regards,

Chris Hawk
Penske Truck Leasing Co., L.P.
Environmental Engineer

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