

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Wednesday, December 17, 2014 2:39 PM
To: 'Brent Wheeler'
Cc: Roe, Dilan, Env. Health; Mark Youngkin; Tim Hallen; Annette Chen; Brian Sheaff; John Accacian
Subject: RE: SWRCB August 2014 Review Summary Report - 5930 College Avenue, Oakland

Brent,
Sorry for my delay. I just received correspondence for two other sites that caused me to recall this email.

In short, the letter does not change the scope of the project; it just documents that the two agencies are in disagreement. ACEH remains as the agency that provides oversight. ACEH's letters are based on applying the LTCP to the case and to provide the rationale (see the April 11, 2014 letter). As is stated in that letter, if additional data is available (either we missed or that your aware of but hasn't been provided), that would allow us to change our understanding of the site under the LTCP, we are very willing to change our position. In part that was the purpose of our meetings. If the data isn't there yet, then additional data collection is warranted to fill the gap in the data (data gap). That obviously is the purpose of the planned Data Gap Work Plan.

Let me know if you have other questions.

Mark Detterman
Senior Hazardous Materials Specialist, PG, CEG
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
Direct: 510.567.6876
Fax: 510.337.9335
Email: mark.detterman@acgov.org

PDF copies of case files can be downloaded at:

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

From: Brent Wheeler [<mailto:b.wheeler@ggtr.com>]
Sent: Thursday, December 04, 2014 2:26 PM
To: Detterman, Mark, Env. Health
Cc: dylan.roe@acgov.org; Mark Youngkin; Tim Hallen; Annette Chen; Brian Sheaff; John Accacian
Subject: SWRCB August 2014 Review Summary Report - 5930 College Avenue, Oakland

Mark,

Attached is a copy of an August 2014 Review Summary Report uploaded by the SWRCB to State Geotracker database on November 6, 2014 for the subject LUST investigation site. Per your April 11, 2014 Letter and follow up meeting at your office on October 30, 2014, we are currently preparing our Data Gap Work Plan and Focused Site Conceptual Model and request clarification on how information provided in the SWRCB's report may impact the proposed scope of work in the Data Gap Work Plan / SCM.

Please contact us with any questions.

*Brent Wheeler
Golden Gate Environmental, Inc.
Golden Gate Tank Removal, Inc.
1455 Yosemite Avenue
San Francisco, CA 94124*

Direct Phone: 415-970-9088 (GGE), 415-512-1555 (GGTR)

Cellular Phone: 415-686-8846

Email: wheelerbrent@ymail.com, b.wheeler@ggtr.com

State Water Resources Control Board

**REVIEW SUMMARY REPORT – ADDITIONAL WORK
THIRD REVIEW – AUGUST 2014**

Agency Information

Agency Name: Alameda County Environmental Health Department (County)	Address: 1131 Harbor Bay Parkway Alameda, CA 94502
Agency Caseworker: Mark Detterman	Case No.: RO0000377

Case Information

USTCF Claim No.: 10787	GeoTracker Global ID: T0600102112
Site Name: Sheaff's Service Station	Site Address: 5930 College Avenue Oakland, CA 94618
Responsible Party 1: Margaret S. Hansen	Address: Private Address
Responsible Party 2: William Sheaff Trust Attn: Brian Sheaff	Address: Private Address
USTCF Expenditures to Date: \$209,462	Number of Years Case Open: 17

To view all public documents for this case available on GeoTracker use the following URL.

URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0600102112

Summary

The Low-Threat Underground Storage Tank (UST) Case Closure Policy (Policy) contains general and media-specific criteria, and cases that meet those criteria are appropriate for closure pursuant to the Policy. This case does not meet all of the required criteria of the Policy. Highlights of the case follow:

This Site is an auto service facility. An unauthorized release was reported in August 1996 following the removal of two USTs (one gasoline and one waste oil) and an unknown volume of contaminated soil was excavated in 1996. Since 1998, four groundwater monitoring wells have been installed and monitored. No active remediation has been conducted at this site. According to groundwater data, water quality objectives have not been achieved.

The petroleum release is limited to the soil and shallow groundwater. According to data available in GeoTracker, there are no public water supply wells or surface water bodies within 1,000 feet of the Site. No other water supply wells have been identified within 1,000 feet of the Site in files reviewed. The unauthorized release is located within the service area of a public water system, as defined in the Policy. The affected shallow groundwater is not currently being used as a source of drinking water, and it is highly unlikely that the affected shallow groundwater will be used as a source of drinking water in the foreseeable future. Other designated beneficial uses of impacted groundwater are not threatened, and it is highly unlikely that they will be, considering these factors in the context of the site setting.

Rationale for Closure under the Policy

- **General Criteria:** The case does not meet all eight Policy general criteria; chlorinated solvents in groundwater.
- **Groundwater Specific Criteria:** The case does not meet Policy criteria because the contaminant plume that exceeds water quality objectives is not defined.
- **Vapor Intrusion to Indoor Air:** The case meets Policy Criterion 2b. Although no document titled "Risk Assessment" was found in the files reviewed, a professional assessment of site-specific risk from exposure through the vapor intrusion pathway was performed by Fund staff. The assessment found that there is no significant risk of petroleum vapors adversely affecting human health. The Site is paved and accidental exposure to site soils is prevented. The onsite building is an active automotive repair facility with multiple rollup doors that would prevent the accumulation of soil vapors in the building. In addition, as an active automotive repair facility, there would adequate air exchange provided by the building's ventilation system required to control vehicle exhaust generated during automotive repair. Additionally, soil vapor samples collected in August 2013 from 4 to 15 feet below ground surface (bgs) at the site showed no vapor intrusion from the UST petroleum hydrocarbon release.
- **Direct Contact and Outdoor Air Exposure:** This case meets Policy Criterion 3b. Although no document titled "Risk Assessment" was found in the files reviewed, a professional assessment of site-specific risk from exposure through the direct exposure pathway was performed by Fund staff. The assessment of site-specific risk from potential exposure to residual soil contamination found that maximum concentrations of petroleum constituents remaining in soil will have no significant risk of adversely affecting human health. The former USTs were located beneath a sidewalk. Site soil contamination is covered with pavement preventing accidental exposure.


Objections to Closure and Responses

According to the Path to Closure page in GeoTracker, finalized on December 11, 2013, the County opposes closure because:


- Release not limited to petroleum hydrocarbons.
RESPONSE: We concur.
- Free product remains.
RESPONSE: No free product remains in site wells.
- Inadequate conceptual site model.
RESPONSE: Adequate data is available in GeoTracker to prepare a conceptual site model as defined by the Policy.
- Secondary source remains.
RESPONSE: Secondary source as defined by the Policy was removed by excavation in 1996.
- Nuisance exists.
RESPONSE: No nuisance exists.
- The case does not meet Policy groundwater criteria.
RESPONSE: We concur.
- The case does not meet Policy vapor criteria.
RESPONSE: The case meets Policy Criterion 2b.
- The case does not meet Policy direct contact criteria.
RESPONSE: This case meets Policy Criterion 3b.

Recommendation

The Fund recommends that the County direct the responsible party, through enforcement if necessary, to define the extent of groundwater contamination.



Kirk Larson, P.G. 8/1/14
Engineering Geologist Date
Technical Review Unit
(916) 341-5663



Robert Trommer, C.H.G. 8/6/14
Senior Engineering Geologist Date
Chief, Technical Review Unit
(916) 341-5684

Sheaff's Service Garage
5930 College Avenue, Oakland
Claim No: 10787

August 2014

[Faint signature]

Name: _____
Title: _____

[Faint signature]

Name: _____
Title: _____