



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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April 9, 2015

Dr. Brian Sheaff  
William G. Sheaff & Patricia Warren Restated Living Trust U/D/T 2/14/89  
1945 Parkside Drive  
Concord, CA 94519  
(sent via e-mail: [drsheaff@pacbell.net](mailto:drsheaff@pacbell.net))

Subject: Modified Work Plan Approval; Fuel Leak Case No. RO0000377 and Geotracker Global ID T0600102112, Sheaffs Service Garage, 5930 College Avenue, Oakland, CA 94618

Dear Dr. Brian Sheaff:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Groundwater Monitoring Report 4<sup>th</sup> Quarter 2014*, dated November 24, 2014, and the *Data Gap Investigation Work Plan with Focused Site Conceptual Model*, dated January 30, 2015. The reports were prepared and submitted on your behalf by Golden Gate Environmental, Inc (GGEI). Thank you for submitting the reports.

The referenced work plan proposes the installation of eight soil bores to collect, depending on location soil, groundwater, and / or soil vapor, the re-sampling of three existing soil vapor wells, and the installation of one sub-slab vapor pin within the office area to collect soil vapor analytical data at critical site locations.

Based on ACEH 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 ACEH is in general agreement of undertaking; however, however, ACEH requests several modifications to the approach. Please submit an excavation report by the date specified below.
  - a. **Soil Sample Selection Protocols** – The referenced work plan proposes to collect and retain soil samples for laboratory analysis from selected soil bores at predetermined depth intervals. Rather than specifically select soil samples based on predetermined depth intervals, ACEH requests the collection of discrete soil samples at signs of contamination (photoionization [PID] detections, discoloration, odor, etc), within the LTCP required intervals of 0 to 5 and 5 to 10 feet below grade surface (bgs). With the LTCP in mind, please ensure multiple soil samples are collected within the 0 to 5 and 5 to 10 foot intervals prescribed by the LTCP.

For non-petroleum concerns (chlorinated solvents, especially tetrachlorethene [PCE], that generally will be investigated at the rear of the property), ACEH is also in general agreement with the proposed sampling depths; however, again requests deviation from pre-selected depth intervals should signs of contamination be encountered in the soil bores.

- b. Borehole Analytical Sample Modification** – As noted, ACEH is in general agreement with the selected analytical program and bore positioning; however, requests the following modifications:
- i. Boreholes B28 Through B30 (Chlorinated Solvent Investigation)** – Except soil bore B30, no soil samples were proposed from these locations, and in bore B30 the proposed samples are shallow due to the chlorinated solvent investigation. Because a oil-water separator was present in the vicinity of these proposed bores, and because a concern has been expressed that an upgradient source may be responsible, please collect and analyze soil for petroleum hydrocarbons from the 0 to 5 and the 5 to 10 foot depth intervals and at signs of contamination are encountered in these depth intervals. This should include Total petroleum Hydrocarbons (TPH) as gasoline (TPHg), TPH as diesel (TPHd), TPH as motor oil (TPHmo), benzene, toluene, ethylbenzene, total xylenes (BTEX), methyl tert butyl ether (MTBE), and naphthalene.
  - ii. Boreholes B31 Through B33** – No soil samples were proposed for these soil bore locations. In order to determine the thickness of the bioattenuation zone available within the vapor intrusion criteria under the LTCP, especially for offsite residential receptors, please collect and analyze soil for petroleum hydrocarbons from the 0 to 5 and the 5 to 10 foot depth intervals and at signs of contamination in these depth intervals. As above, this should include TPHg, TPHd, TPHmo, BTEX, MTBE, and naphthalene. Collection of these samples in soil bore B33 may provide downgradient or lateral, delineation of a soil plume.
  - iii. Borehole B35** – In order to determine the extent of degradation since the collection of soil samples in soil bores B2 and B22 in 1998 and 2005, respectively, please additionally add BTEX and MTBE to the analytical suite. Additionally, please ensure the soil bore is installed in closer proximity to B2 and B22 to ensure this is achieved.
- c. Vapor Sampling** - As noted, ACEH is in general agreement with the proposed vapor investigation program; however, requests the following modifications:
- i. Vapor Analytical Suite** – In order to remain consistent with existing Department of Toxic Substance Control (DTSC) guidance for Nylaflo tubing, ACEH additionally requests that naphthalene be analyzed for by TO-17. This appears to be particularly important at this site where naphthalene concentrations in soil and groundwater are unusually higher than is typical. This is expected to provide multiple lines of evidence for concentrations of naphthalene, and to gather the data quickly in one mobilization.
  - ii. Shroud Helium Tracer Concentration** – In the event isopropyl alcohol (IPA) is detected in a vapor sample, existing DTSC guidance provides guidelines for the acceptability of the soil vapor result provided the shroud tracer concentration is known. Therefore, in order to increase the likelihood of the collection of acceptable data in one mobilization, ACEH requests that the tracer concentration in the shrouds be documented.
- 2. Groundwater Monitoring** – Please continue to conduct semi-annual groundwater monitoring events at the site and submit reports in accordance with the schedule below. Please continue to include analysis for naphthalene, PAHs, TPHd, and TPHmo in future groundwater monitoring events. The need for additional analysis of these contaminants is requested to be evaluated thereafter.

### **TECHNICAL REPORT REQUEST**

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

- **June 19, 2015**– Site Investigation  
(File to be named: RO377\_SWI\_R\_YYYY-mm-dd)
- **June 19, 2014** – First 2015 Semi-Annual Groundwater Monitoring Event (can be combined with about report); (File to be named: RO377\_GWM\_R\_YYYY-mm-dd)

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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>.

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 567-6876 or send me an electronic mail message at [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org).

Sincerely,

Mark Detterman, P.G., C.E.G.  
Senior Hazardous Materials Specialist

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

cc: John Accacian, 5930 College Avenue, Oakland, CA 94618 (sent via electronic mail:  
[jjiracingaol@yahoo.com](mailto:jjiracingaol@yahoo.com))

Brent Wheeler, Golden Gate Environmental, Inc, 1455 Yosemite Avenue, San Francisco, CA  
94124 (sent via electronic mail: [b.wheeler@ggtr.com](mailto:b.wheeler@ggtr.com))

Mark Youngkin, Golden Gate Environmental, Inc, 1455 Yosemite Avenue, San Francisco, CA  
94124 (sent via electronic mail to: [geomark@sbcglobal.net](mailto:geomark@sbcglobal.net))

Dilan Roe, ACEH (sent via electronic mail to [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))

Mark Detterman (sent via electronic mail to [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))

Electronic file, GeoTracker

## 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.