

Carolyn C. Fong, Trustee for Lily Angela Chun 1991 Living Trust

711 E. Hermosa Dr., San Gabriel, CA 91775

(626) 285-2658

August 31, 2017

Mr. Robert Schultz, CHG
Alameda County Environmental Health Care Services Agency
Department of Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502

Subject: Bill Chun Service Station, 2301 Santa Clara Ave., Alameda CA 94501
SLIC #RO0382, Geotracker Global ID #T0600100980

Dear Mr. Schultz,

I have read again the SWRCB RSR - Additional Review, October 2016, and the approved O&M Plan schedule indicating that the system is to operate for 104 weeks (November 2017). It seems premature to have a meeting soon and therefore I am requesting that the Sept. 12th meeting be postponed.

Peter Sims (Project Geologist) and Kristopher Larson (PG), are my experts and can respond to your technical questions. They have been involved with the site since 2012 when at that time, ACEH approved me to hire Ninyo & Moore Geotechnical and Environmental Sciences Consultants because the property was in Site Investigation phase for decades. With their project coordination plan writing, remedial implementation and Jerry Wickham as the ACEH case manager, the site within a couple of years moved into the current phase of CAP/REM. I credit their working relationship for the site progressing toward Low Threat Closure Policy goals.

I have requested Peter Sims to provide in a timely manner answers to your inquiries regarding the project system and data reports or to connect you to the ETEC contractor (Brian Timmons) for the (DO-IT 10-C) groundwater recirculation and enhanced bioremediation system. That information as well as the data from 2nd and 3rd quarter GWM and O&M system should provide all of us more significant information to assess the time for the site to reach the closure goals of the SWRCB, UST Low Threat Closure Policy.

With all due respect, I request that a group meeting be postponed to a date after the 2nd and 3rd quarter data are available, possibly December, 2017 or January 2018.

Regards,

Carolyn C. Fong, TTEE

CC: Dilan Roe, ACDEH, Dilan.Roe@acgov.org
Peter Sims, Project Geologist, psims@ninyoandmoore.com
Kristopher Larson, PG, klarson@ninyoandmoore.com

Attachments: RSR-Additional Work, Oct. 2016, O&M Schedule



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

December 14, 2016

Lily A. Chun 1991 Living Trust
Attn: Carolyn Fong
711 east Hermosa Drive
San Gabriel, CA 91775

REVIEW SUMMARY REPORT FOR CLAIM NUMBER: 7147
Bill Chun Service Station, 2301 Santa Clara Avenue, Alameda, CA 94501

The UST Cleanup Fund has completed our review of your claim. A copy of our Review Summary Report, including our recommendations for your site, has been transmitted to your regulatory agency caseworker and we are enclosing a copy for your information. Please note that the Fund's recommendations are based on our review of information contained in the Fund's case files, data currently in the GeoTracker database and any other sources of information that were readily available to Fund staff at the time the review was conducted. Consequently, they do not reflect any information that may have recently been submitted by your consultant to the regulatory agency.

The Fund's recommendations, as a result of the review process, do not relieve you of any responsibilities or activities for which you have been directed to conduct by the local regulatory agency responsible for oversight of your case.

Additional Work may require submittal of a Project Execution Plan (PEP) in addition to a Budget Change Request. The PEP is to be prepared by the Responsible Party (RP) and/or their Authorized Representative. The PEP and its instructions can be downloaded from the State Board website at: http://www.waterboards.ca.gov/water_issues/programs/ustcf/pep.shtml

If you have any questions regarding the attached information, please call me at (916) 341-5684 or Scott Lookingbill (916) 449-5634.

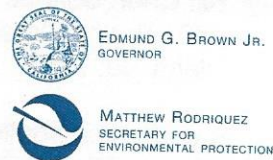
Sincerely,

A handwritten signature in black ink that reads "Vivian Armenta".

For:

Pat G. Cullen, P.G.
Senior Engineering Geologist
Chief, Technical Review Unit
Underground Storage Tank Cleanup Fund

Enclosure



State Water Resources Control Board

REVIEW SUMMARY REPORT – ADDITIONAL WORK
FOURTH REVIEW – OCTOBER 2016

Agency Information

Table with 2 columns: Agency Name, Address, Agency Caseworker, Case No.

Case Information

Table with 2 columns: USTCF Claim No., Site Name, Responsible Party, USTCF Expenditures to Date, Fund Budget Category, GeoTracker Global ID, Site Address, Address, Number of Years Case Open.

To view all public documents for this case available on GeoTracker use the following URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0600100980

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 case is commercial business that no longer stores petroleum hydrocarbons. An unauthorized release was reported in July 1992 followed by the removal of three gasoline USTs. Approximately 50 cubic yards of contamination soil was excavated to a total depth of 9 feet in 1992. A groundwater extraction, treatment, and injection system has operated from November 2014 through present and has removed approximately 1,247,680 gallons of contaminated groundwater. The system has injected approximately 2,850 pounds of Custom Blend Nutrient for enhanced biological attenuation along with an unknown quantity of biosurfactant. Since 1995, 21 groundwater monitoring wells and 22 extraction wells have been installed and monitored. Eight groundwater monitoring wells and 13 extraction wells have been abandoned. According to groundwater data, water quality objectives have not been achieved for all constituents.

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 projected plume boundary. There is an inactive private supply well located approximately 800 feet southeast (upgradient) of the projected plume boundary. 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

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

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 meets seven of eight Policy general criteria. A site conceptual model that assesses the stability and mobility of the plume has not been developed because active groundwater remediation is in progress.
- **Groundwater Specific Criteria:** The case does not meet Policy criteria for groundwater. The contaminant plume that exceeds water quality objectives is between 100 feet in length and 250 feet in length, with a supply well located less than 1,000 feet from the projected plume boundary.
- **Vapor Intrusion to Indoor Air:** The case does not meet Policy criteria 1, 2, 3, or 4 because the depth to groundwater is less than 10 feet below ground surface (bgs) and benzene concentrations exceed 1,000 µg/L in groundwater. In addition, soil vapor samples collected in November 2012 near an offsite building indicated benzene, ethylbenzene, and naphthalene concentrations exceed soil gas criteria for commercial properties with no bioattenuation zone.
- **Direct Contact and Outdoor Air Exposure:** The case does not meet Policy criteria because the maximum concentrations of benzene, ethylbenzene, and naphthalene reported in 5 to 10 foot bgs soil samples collected in 2012 exceed those in Policy Table 1 for commercial/industrial use.

Objections and Responses

The County Staff objects to case closure (Geotracker Path to Closure Plan dated 1/7/16) because:

- **COMMENT:** Secondary source has not been removed to the extent practicable.
RESPONSE: State Water Board staff agree. Additional groundwater remediation is necessary to remove the source of off-site soil gas contamination.
- **COMMENT:** The contaminant plume that exceeds water quality objectives is NOT stable or decreasing in areal extent, and does NOT meet all of the additional characteristics of one of the five classes of sites.
RESPONSE: State Water Board staff agree. The contaminant plume that exceeds water quality objectives greater than 100 feet in length with a supply well located less than 1,000 feet from the projected plume boundary.
- **COMMENT:** The site is not considered low threat for vapor intrusion to indoor air.
State Water Board staff agree. The depth to groundwater is less than 10 feet bgs and benzene concentrations exceed 1,000 µg/L in groundwater. In addition, soil vapor samples collected in November 2012 near an offsite building indicated benzene, ethylbenzene, and naphthalene exceed Policy soil gas criteria for commercial properties with no bioattenuation zone.
- **COMMENT:** The site is not considered low threat for direct contact and outdoor air exposure.
RESPONSE: State Water Board staff agree. The maximum concentrations of benzene, ethylbenzene, and naphthalene reported in 5 to 10 foot bgs soil samples collected in 2012 exceed those in Policy Table 1 for commercial/industrial use.

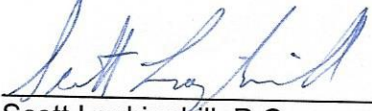
Recommendation

State Water Board staff concur with the steps to resolve the remaining impediments identified in the January 2016 Path to Closure Plan. This will include operating the groundwater treatment system through November 2017, followed by 12 months of verification groundwater monitoring, and the installation of soil vapor probes.

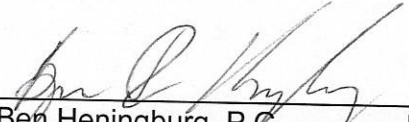
Bill Chun Service Station
2301 Santa Clara Avenue, Alameda
Claim No: 7147

October 2016

The recommended Fund budget category for this claim is: CAP/REM – Corrective Action Plan/Remediation.

 10/19/16

Scott Lookingbill, P.G. Date
Engineering Geologist
Expedited Claim Account Unit
(916) 449-5634

 10/19/16

Ben Heningburg, P.G. Date
Senior Engineering Geologist
Chief, Expedited Claim Account Unit
(916) 449-5605

Table 1 - Operations and Maintenance Schedule

Period after Startup	Addition of Biological Amendments and System Monitoring	System Maintenance	Groundwater Monitoring	System Sampling
Week 1	X		X	X
Week 2	X			
Week 4	X		X	X
Week 6	X			
Week 8	X		X	X
Week 10	X			
Week 12	X	X	X	X
Week 14	X			
Week 16	X			X
Week 18	X			
Week 20	X			X
Week 22	X			
Week 24	X	X	X	X
Week 26	X			
Week 28	X			X
Week 30	X			
Week 32	X			X
Week 34	X			
Week 36	X	X	X	X
Week 38	X			
Week 40	X			X
Week 42	X			
Week 44	X			X
Week 46	X			
Week 48	X	X	X	X
Week 50	X			
Week 52	X			X
Week 54	X			
Week 56	X			X
Week 58	X			
Week 60	X	X	X	X
Week 62	X			
Week 64	X			X
Week 66	X			
Week 68	X			X
Week 70	X			
Week 72	X	X	X	X
Week 74	X			
Week 76	X			X
Week 78	X			
Week 80	X			X
Week 82	X			
Week 84	X	X	X	X

Table 1 - Operations and Maintenance Schedule

Period after Startup	Addition of Biological Amendments and System Monitoring	System Maintenance	Groundwater Monitoring	System Sampling
Week 86	X			
Week 88	X			X
Week 90	X			
Week 92	X			X
Week 94	X			
Week 96	X	X	X	X
Week 98	X			
Week 100	X			X
Week 102	X			
Week 104	X			X

Note:

The O&M schedule is projected over two years because this is the maximum anticipated time to reach the State Water Resources Control Board Low Threat Underground Storage Tank Case Closure Policy goals.

STATE WATER RESOURCES CONTROL BOARD GEOTRACKER

BILL CHUN SERVICE STATION (T0600100980) - [\(MAP\)](#)

[SIGN UP FOR EMAIL ALERTS](#)

2301 SANTA CLARA
ALAMEDA, CA 94501
ALAMEDA COUNTY
LUST CLEANUP SITE
[PRINTABLE CASE SUMMARY / CSM REPORT](#)

CLEANUP OVERSIGHT AGENCIES
ALAMEDA COUNTY LOP - CASE #: RO0000382
CASEWORKER: [KIT SOO](#)
SAN FRANCISCO BAY RWQCB (REGION 2) - CASE #: 01-1063
CASEWORKER: [Regional Water Board](#)
CUF Claim #: 7147
CUF Priority Assigned: B
CUF Amount Paid: \$1,083,072

PATH TO CLOSURE PLAN FY 12/13 AS OF 1/7/2016

[BACK TO LTCP CHECKLIST](#)

IMPEDIMENT 1:

General Criteria D: Free product has NOT been removed to the maximum extent practicable

Step to Resolve Impediment 1 - Step 1:

No longer an impediment

COMPLETION DATE	
PROJECTED DATE	ACTUAL DATE
10/12/2017	7/21/2015

IMPEDIMENT 2:

General Criteria E: A conceptual site model that assesses the nature, extent, and mobility of the release has NOT been developed

Step to Resolve Impediment 2 - Step 1:

No longer an impediment

COMPLETION DATE	
PROJECTED DATE	ACTUAL DATE
10/12/2017	7/21/2015

IMPEDIMENT 3:

General Criteria F: Secondary source has NOT been removed to the extent practicable

Step to Resolve Impediment 3 - Step 1:

Remedial construction (4 months) Operation of remedial system (24 months) Verification monitoring (12 months) Closure requirements along path to closure (6 months)

COMPLETION DATE	
PROJECTED DATE	ACTUAL DATE
10/12/2017	

IMPEDIMENT 4:

Media-Specific Criteria: Groundwater: The contaminant plume that exceeds water quality objectives is NOT stable or decreasing in areal extent, and does NOT meet all of the additional characteristics of one of the five classes of sites.

Conditions that do not meet the policy criteria:

- Plume Length (That Exceeds Water Quality Objectives): ≥ 100 Feet and < 250 Feet
- Benzene Concentration: ≥ 3,000 µg/l

Step to Resolve Impediment 4 - Step 1:

Operation of remedial system (12 months) Verification monitoring (12 months) Closure requirements along path to closure (6 months)

COMPLETION DATE	
PROJECTED DATE	ACTUAL DATE
6/12/2018	

IMPEDIMENT 5:

Media Specific Criteria: Petroleum Vapor Intrusion to Indoor Air: The site is NOT considered low-threat for the vapor-intrusion-to-air pathway and site-specific conditions do NOT satisfy items 2a, 2b, or 2c .

Conditions that do not meet the policy criteria:

- Exposure Type: Residential
- Free Product: In Groundwater
- Bioattenuation Zone Thickness: ≥ 5 Feet and < 10 Feet
- O2 Data in Bioattenuation Zone: No O₂ Data
- Benzene in Groundwater: ≥ 1,000 µg/l

- Soil Gas Benzene: $\geq 280,000 \mu\text{g}/\text{m}^3$
- Soil Gas EthylBenzene: $\geq 3,600 \mu\text{g}/\text{m}^3$ and $< 1,100,000 \mu\text{g}/\text{m}^3$
- Soil Gas Naphthalene: Unknown

Step to Resolve Impediment 5 - Step 1:

Operation of remedial system (12 months) Verification monitoring (12 months) Closure requirements along path to closure (6 months)

COMPLETION DATE	
PROJECTED DATE	ACTUAL DATE
6/12/2018	

IMPEDIMENT 6:

Media Specific Criteria: Direct Contact and Outdoor Air Exposure: The site is NOT considered low-threat for direct contact and outdoor air exposure as it does NOT meet 1, 2, or 3.

Conditions that do not meet the policy criteria:

- Exposure Type: Residential
- Petroleum Constituents in Soil: >5 Feet bgs and ≤ 10 Feet bgs
- Soil Concentrations of Benzene: $> 14 \text{ mg}/\text{kg}$
- Soil Concentrations of Naphthalene: Unknown

Step to Resolve Impediment 6 - Step 1:

Operation of remedial system (12 months) Verification monitoring (12 months) Closure requirements along path to closure (6 months)

COMPLETION DATE	
PROJECTED DATE	ACTUAL DATE
6/12/2018	

REQUIREMENTS ALONG PATH TO CLOSURE

<u>DATE IDENTIFIED FOR CLOSURE</u>	<u>CLOSURE INITIATED BY</u>	<u>RP NOTIFICATION DATE</u>	<u>PUBLIC PARTICIPATION COMPLETION DATE</u>	<u>WELL DESTRUCTION LETTER DATE</u>	<u>WELL DESTRUCTION DATE</u>	<u>WASTE DISPOSAL DATE</u>	<u>LAND USE RESTRICTION DATE</u>	<u>SITE CLOSURE DATE</u>
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Schultz, Robert, Env. Health

From: Carolyn Fong <carolynfong1@sbcglobal.net>
Sent: Thursday, August 31, 2017 10:18 AM
To: Schultz, Robert, Env. Health; Peter Sims; Kris Larson; Roe, Dilan, Env. Health; Brian Timmins
Cc: psims@ninyoandmoore.com
Subject: Fw: Request to Postpone September 12, 2017 meeting
Attachments: Postpone Sept 2017 meeting request.docx; RSR for 7147 Oct 2016_fourth review.pdf; O&M Schedule_2301 Santa Clara Ave.pdf; Jan 2016 Path to Closure Plan.pdf

Hello Mr. Schultz, K. Larson, D. Roe, B. Timmins,
Peter caught my mistake in the startup date. He has verified that is is Nov. 21, 2014.

Please note that I am mistaken about some dates in my email message.
I have **highlighted** the corrections in my message and apologize for adding confusion.

Best regards,

Carolyn Fong

----- Forwarded Message -----

From: Carolyn Fong <carolynfong1@sbcglobal.net>
To: Schultz Robert Env. Health <robert.schultz@acgov.org>
Cc: Roe Dilan Env. Health <dilan.roe@acgov.org>; Peter Sims <psims@ninyoandmoore.com>; Kris Larson <kl Larson@ninyoandmoore.com>; Brian Timmins <brian@etecllc.com>
Sent: Thursday, August 31, 2017 7:25 AM
Subject: Request to Postpone September 12, 2017 meeting

Good morning, Mr. Schultz,

I have attached a letter as a formal request with reasons to postpone the Sept. 12, 2017 meeting when we can also discussed the Path to Closure. Also attached are PDFs: the RSR, October 2016 and the O&M schedule.

The CAP and O&M Plan indicated a 2014 installation of the DO-IT 10 C, but the CAP implementation was delayed for one year by the owner of 2309 Santa Clara Ave. not allowing access to the two monitoring wells on her property in order for the quarterly GWM reports to be completed. Addends to the CAP and O&M Plan were developed while I was in legal negotiations for several months with the owner to obtain a license access agreement. The owner signed and the license was recorded with her deed in (June, 2015) **September 3, 2014**. Therefore, the remedial system was not installed until November (2015) **2014**. The DO-IT 10-C system (was started up on or about Nov. 14, 2015) **start up November 21, 2014**. Two years of operation would be around Nov. (2017) **2016**.

I hope this explains why the O&M schedule is dated 2014 but why the operation did not start (that year) **earlier in the year.** Peter Sims can verify for you the exact date of the system start. Additional information is the January 2016 Path to Closure.

Kind regards,

Carolyn C. Fong, TTEE