

From: [Detterman, Karel, Env. Health](#)
To: ["Messerotes, Gary"](#); [Hardin, Jack](#); [Jansen, Alicia](#)
Cc: [Roe, Dilan, Env. Health](#); karen.burlingame@goodyear.com
Subject: Fuel Leak Case RO474 Merritt Tire Sale, Geotracker Global ID T0600101801, 3430 Castro Valley Blvd., Castro Valley, CA
Date: Wednesday, April 30, 2014 9:31:02 AM
Attachments: [SCM-Data Gap Work Plan Sample Table.docx](#)
[Attachment 1 and ftpUploadInstructions 2012 07 25.pdf](#)

Hello Gary, Jack, and Alicia:

Thank you for participating in a conference call with Alameda County Environmental Health (ACEH) on April 21, 2014. We were informed that Ms. Karen Burlingame, the representatives from The Goodyear Tire and Rubber Company (Goodyear) was unable to participate. The purpose of the April 21st call was to discuss the *Site Conceptual Model* (SCM) dated March 19, 2014 submitted on Goodyear's behalf by Stantec Consulting Services, Inc. (Stantec). Thank you for submitting the SCM. I will e-mail the comments Dilan and I made on the SCM text, table, and figures in two separate e-mails due to the large size of the files.

ACEH staff has reviewed the case file, including the *Site Conceptual Model* in conjunction with the State Water Resources Control Board's (SWRCB) Low Threat Underground Storage Tank Case Closure Policy (LTCP).

A discussion of the SCM is summarized in the following bulleted list:

1. Please use the SWRCB's Low Threat Underground Storage Tank Case Closure Policy (LTCP) as a reference to guide the case to closure.
2. ACEH's biggest concern is tetrachloroethene (PCE), vinyl chloride (VC), and free product (non-aqueous phase liquids [NAPL]) in former well MW-3:
 - a. What and where is the source of the PCE, VC, and free product;
 - b. Definition of PCE needs to be accomplished;
 - c. Requested contours of free product shown on cross section & plan view & how free product is related to potential source areas;
3. Adequacy of monitoring well network:
 - a. Boring log lithology points to possible confined conditions;
 - b. MW-4 is not screened in same lithologic unit (SP/SC) at 15 feet below grade as MW-1, MW-2, & former MW-3 therefore MW-4 is not an adequate downgradient well to monitor for hydraulic lifts, which may be potentially associated PCE;
 - c. Monitor and sample MW-5 using low-flow purging and sampling and analyze groundwater samples for VOCs EPA 8260 and SVOCs EPA 8270;
 - d. If total depth of MW-5 matches construction depth, there shouldn't be a need to redevelop well although it hasn't been sampled since 8/2013;
 - e. Please prepare and submit with the updated SCM a Rose diagram documenting direction variations in the groundwater gradient;
4. An Oxygen-Releasing Compound (ORC) Amendment was placed in the excavations but there were no confirmation borings done to see if ORC & excavation was successful;
5. Please revise Figure 8 by adding all eleven potential source areas listed in Section 1.1.2;
6. Please submit the laboratory analytical report for the soil excavated during the August 2012 remedial action event which are referenced in Stantec's 10/19/2012

Remediation Summary Report and First Semi-Annual Groundwater Monitoring Report, page 5: "Soil proximate to the former UST was stored and characterized separately from the rest of the excavated soil, due to the presence of a *strong odor and visible sheen on the soil*. This investigation-derived waste was subsequently sampled by Stantec, and profiled as a non-hazardous waste";

- a. Additionally, please submit daily field observations from the August 2012 remedial action event to inform of the location of the *visible sheen on the soil*;
7. Last bullet of Section 1.1 regarding the oil/water separator and PCBs: please investigate for VOCs, SVOC including PAHs and naphthalene;
8. Groundwater contamination is probably not a dissolved phase in groundwater issue.

Based on the discussions during our meetings, to advance your case to site closure, ACEH requests that you revise your SCM by using existing site and adjacent site data, and prepare a Data Gap Investigation Work Plan that is supported by a focused SCM discussed during our meeting. Please use the attached tabular form SCM and Data Gap Summary and Proposed Investigation.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with Attachment 1 and the following specified file naming convention and schedule:

- **June 30, 2014** – Revised Site Conceptual Model and Data Gap Investigation Work Plan including Standard Operation Procedures (SOPs)
File to be named: RO479_SCM_WP_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, ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please send me an e-mail message at karel.detterman@acgov.org or call me at (510) 567-6708.

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