

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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February 8, 2006

Mr. James Chung
San Pablo Auto Body
2926 San Pablo Avenue
Oakland, CA 94608

Subject: SLIC Case RO0002567, Chung Property, 2926 and 2942 San Pablo Avenue, Oakland, CA

Dear Mr. Chung:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above-referenced site, including the reports entitled, "Site Characterization Report," dated August 31, 2004 and "Report of May 2005 Groundwater Sampling," dated June 3, 2005. Both reports were prepared on your behalf by PIERS Environmental Services, Inc. The "Site Characterization Report," presents the results of a soil and groundwater investigation that included exploratory borings, soil and grab groundwater sampling, and installation of three monitoring wells at the site. The investigation found elevated concentrations of volatile organic compounds (VOCs); primarily trichloroethene (TCE) in soil and groundwater in the area of a former metal works in the central portion of the site. Up to 92 milligrams per kilogram (mg/kg) of TCE were detected in shallow soil at the site. Up to 412,00 micrograms per liter ($\mu\text{g/L}$) of TCE were detected in groundwater at the site. The "Site Characterization Report," concluded that TCE in the area of the former plating works represents a source area that will continue to contribute to dissolved concentrations in groundwater until the source is remediated and the surface is paved.

Based on discussions during our meeting conducted on February 1, 2006, the area of the former plating works is currently vacant, but plans for the site include the construction of an oil change and car wash facility in this area of the site. The elevated concentrations of VOCs may pose a risk to human health through the indoor air vapor intrusion pathway. Further assessment of the potential for indoor air vapor intrusion is required as discussed in technical comment 1 below. We also request that you evaluate whether the apparent hydraulic gradient for the site is accurate and whether the three monitoring wells at the site adequately monitor plume migration. As discussed in technical comment 7 below, cleanup of the TCE source area(s) will be required to prevent continued release of TCE to groundwater in the area of the site.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Potential Risks from Vapor Intrusion.** The elevated concentrations of TCE detected in soil and groundwater at the site may pose a risk to human health through the indoor air

vapor intrusion pathway. Further assessment of the potential for indoor vapor intrusion is required. The use of soil gas sampling is to be considered to more directly assess potential vapor intrusion risks. In addition, soil gas sampling will help to define the extent of the source area in the area of boring B-9 and whether an additional TCE source area is present near boring B-10 in the southern portion of the site. We request that you present plans to further assess potential vapor intrusion risks and the extent of the source area(s) in the Work Plan requested below.

2. **Hydraulic Gradient and Plume Delineation.** The apparent hydraulic gradient for the site is to the west at 0.31 feet per foot based on water levels from the three monitoring wells at the site. An apparent hydraulic gradient of 0.31 feet per foot is significantly higher than typically observed in the types of soils that are present at the site. Please evaluate whether the apparent hydraulic gradient for the site is accurate. Please consider whether monitoring well MW-2 may be installed within a separate water-bearing layer than the other two monitoring wells. Please also review the consistency of the apparent hydraulic gradient with regional flow directions observed at other sites in the area and observed contaminant distribution. TCE was detected at a concentration of 2,400 µg/L in a grab groundwater sample collected from boring B10B, which is located south (crossgradient) of the source area near boring B-9. Please present your evaluation and plans to better define the hydraulic gradient in the Work Plan requested below.
3. **Monitoring Well MW-2.** During the most recent groundwater sampling event, TCE was detected at a concentration of 210 µg/L in well MW-2, which is screened within an interval from 30 to 34 feet bgs. TCE was previously detected at significantly higher concentrations of 3,780 and 2,500 µg/L in grab groundwater samples collected at shallow depths from borings B-5 and B-7, respectively. Please evaluate whether groundwater monitoring is needed within shallow groundwater as well as the deeper intervals currently monitored by the three existing wells. Present plans for monitoring well installation in the Work Plan requested below.
4. **Groundwater Monitoring.** Based upon the assessment of hydraulic gradient, plume delineation, and groundwater monitoring wells requested in technical comments 2 and 3, please propose a groundwater monitoring program in the Work Plan requested below.
5. **Detailed Well Survey.** In order to identify potential receptors for the TCE plume from your site, we request that you locate all wells (monitoring and production wells: active, inactive, standby, decommissioned, abandoned and dewatering, drainage and cathodic protection wells) within ½ mile of the subject site. We recommend that you obtain well information from both Alameda County Public Works Agency and the State of California Department of Water Resources, at a minimum. Submittal of maps showing the location of all wells identified in your study, and the use of tables to report the data collected as part of your survey are required. Please provide a table that includes the well designation, location, total depth, diameter, screen interval, date of well installation, current status, historic use, and owner of the wells. In addition, please provide well logs and completion records for wells downgradient from the site that are potential receptors. Please present your results in the Work Plan requested below.
6. **Metals and Cyanide.** Only two soil samples (B-9 and B-10 at 1.5 feet bgs) have been analyzed for metals and cyanide. Given the large area over which the former plating works

potentially extended and the unknown nature of the plating operations, additional soil sampling for metals and cyanide is required. In addition, analyses for metals, including hexavalent chromium, and cyanide in groundwater will be required. Please present your plans for characterizing metals and cyanide in the Work Plan requested below.

7. **Source Area Remediation.** Cleanup of TCE in soil and groundwater within the source area will be required to prevent continued release of TCE to groundwater in the area of the site. Following assessment of potential risks from indoor air vapor intrusion and any other relevant exposure pathways, remedial alternatives are to be evaluated and the proposed cleanup alternative presented in the Corrective Action Plan requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **April 15, 2006 – Work Plan**
- **Within 120 days following approval of Work Plan by ACEH - Corrective Action Plan**

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

Effective **January 31, 2006**, 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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail

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addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at jerry.wickham@acgov.org.

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.

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

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Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Joel Greger
PIERS Environmental Services, Inc.
1330 S. Bascom Avenue, Suite F, San Jose, CA 95128

Donna Drogos, ACEH
Jerry Wickham, ACEH
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