

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

December 6, 2006

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

Subject: SLIC Case RO0002567 and Geotracker Global ID SL0600138148, Chung Property,  
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 and the report entitled, "Corrective Action Plan with Additional Investigation and Groundwater Sampling Report," dated November 2006. The Corrective Action Plan (CAP) presents the results of site investigation activities conducted in September and October 2006. Based on the results presented in the November 2006 CAP, additional investigation is required for volatile organic compounds (VOCs) in soil gas, petroleum hydrocarbons in soil and groundwater, and metals in soil. The CAP also evaluates alternatives for site remediation. As discussed in technical comments 8 and 9 below, we request some revision of the remedial alternatives. Therefore, we request that you submit a **Work Plan for Additional Investigation and Revised CAP by February 16, 2006.**

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

**TECHNICAL COMMENTS**

- 1. Total Petroleum Hydrocarbons (TPH) in the Area of Surface Soil Sample SS3Ad2.** TPH as diesel and motor oil were detected in soil sample SS3Ad2. We concur with the recommendation to extend one soil boring to groundwater adjacent to sampling location SS3Ad2. Please present plans to sample soil and groundwater in the area of sampling location SS3Ad2 in the Work Plan requested below.
- 2. Arsenic Concentrations in Soil.** We concur that the concentrations of arsenic detected in soil are within the potential range of ambient concentrations. No further investigation specifically for arsenic is required at this time. However, the concentrations of several other metals, including cadmium, chromium, copper, nickel, and zinc detected in soil are elevated above ambient concentrations and Environmental Screening Levels (San Francisco Regional Water Quality Control Board February 2005) and will require further investigation as discussed in the technical comments below.

8. **Proposed Remedial Alternatives.** The CAP currently proposes injection of permanganate into groundwater as the first remedial alternative prior to any excavation. Soil mixing is then proposed in the source area to be followed by excavation and removal of remaining soil with high residual concentrations and metals in surface soils. We request that you reconsider this sequence of remedial alternatives to allow removal of metals in surface soils and source treatment or removal to precede groundwater treatment. Groundwater treatment may not be effective without source area treatment. In addition, removal of the surface soils with high concentrations of metals is recommended prior to either groundwater treatment or soil mixing to avoid health and safety concerns for site workers and area residents during remedial activities and to avoid mixing the metals with deeper soils. We request that you revise the section of the Remedial Action Plan accordingly in the revised CAP requested below.
9. **Health and Safety Concerns.** Health and safety concerns during site remediation will be a concern for the site due to the proximity of the site to nearby residences, the elevated concentrations of VOCs in subsurface soils which may be brought to the surface during soil mixing, and the elevated concentrations of metals in surface soils that may be disturbed and dispersed by cleanup activities. In the revised CAP requested below, please expand the discussion of potential health and safety concerns for each of the remedial options considered.
10. **Request for Identification of Adjacent Property Owners.** Public participation is a requirement for the Corrective Action Plan process. In order to provide notification to potentially affected members of the public, please provide a list of all properties, which are currently or may in the future be directly or indirectly affected by the surface or subsurface contamination from your site or the proposed corrective action. The list is to identify the properties by street address, parcel number, and property owner name. Please also provide a map showing the street address for each of the listed properties. A current mailing address is to be included for each property owner. ACEH will notify each of the property owners on the list of the proposed corrective action.

#### TECHNICAL REPORT REQUEST

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

- **February 16, 2007** – Work Plan for Additional Investigation and Revised CAP

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

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

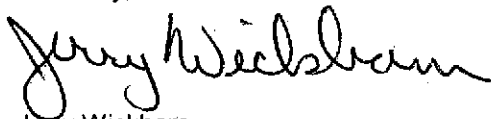
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**AGENCY OVERSIGHT**

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

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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