



April 20, 2018

Rashid Ghafoor (Sent via e-mail to: rashidz1@aol.com)
226 Havenwood Circle
Pittsburg, CA 94567

Subject: Fuel Leak Case No. RO0002931 and GeoTracker Global ID T0600174667, Shore Acres
Gas, 403 E. 12th St., Oakland, CA 94606

Dear Mr. Ghafoor:

Alameda County Department of Environmental Health (ACDEH) and Underground Storage Tank Fund (USTCF) staff discussed prioritization of the Technical Comments provided to you in ACDEH's August 11, 2017 Directive Letter to fill remaining numerous data gaps to meet the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) adopted by the SWRCB on May 1, 2012 for the closure of leaking petroleum underground storage tank (UST) sites. ACDEH has determined that the site does not meet the LTCP General Criteria d (Free Product Removal), e (Site Conceptual Model), f (Secondary Source Removal), Media-Specific Criteria for Groundwater, Media-Specific Criteria for Vapor Intrusion to Indoor Air, and the Media-Specific Criteria for Direct Contact (See the August 11, 2017 Directive Letter).

To continue progress on the path to closure, ACDEH and USTCF request that you address all of the following Technical Comments, including Technical Comments 3, 4, and 6, and 8 from the August 11, 2017 Directive Letter, in a *Data Gap Work Plan and Site Conceptual Model*.

TECHNICAL COMMENTS

- 1. LTCP Media Specific Criteria for Groundwater, August 11, 2017 Directive Letter Technical Comment 3:** ACDEH's review of the case files indicates that insufficient data and analysis has been presented to assess compliance with Media Specific Criteria for Groundwater. The rose diagram included in the October 23, 2017 *Third Quarter 2017 Groundwater Monitoring Report* indicates a southeasterly groundwater gradient direction parallel to East 12th Street. Business and residences are located southeast and immediately downgradient of the site. Wells EW-4 and MW-2 located in the down gradient portion of the property proximal to the southeastern property boundary detected Total Petroleum Hydrocarbons as gasoline (TPHg) and benzene and indicate that the plume length is undefined and have not determined if free product has migrated southeast and downgradient off site. Please present a strategy in the Data Gap Work Plan requested below to collect sufficient off-site and downgradient soil and groundwater data to satisfy the LTCP Media Specific Criteria for Groundwater criteria.
- 2. LTCP Media Specific Criteria for Vapor Intrusion to Indoor Air, August 11, 2017 Directive Letter Technical Comment 4:** ACDEH's review of the case files indicates that insufficient data and analysis has been presented to assess compliance with Media Specific Criteria for Vapor Intrusion to Indoor Air to businesses and residences located southeast to, immediately adjacent to, and immediately downgradient of the site. Additionally, vapor intrusion to residential houses immediately adjacent to and southwest of MW-1 has not been assessed. In accordance with the LTCP, since benzene is detected between 100 ug/L and 1,000 ug/L in groundwater, the bioattenuation zone must greater than 10 feet thick. Review of the site's boring logs indicate a bioattenuation zone greater than 5 feet bgs but less than 10 feet bgs, and indicates the potential for vapor intrusion to indoor air to the neighboring residences and business. As previously

requested in ACDEH's February 18, 2016, and August 11, 2017 Directive Letters, ACDEH requests preparation of a Data Gap Work Plan to assess potential vapor intrusion to indoor air of the on-site trailer and adjacent downgradient businesses and residences. Please present a strategy to collect sufficient data to satisfy the Media Specific Criteria for Vapor Intrusion to Indoor Air. Please ensure that your strategy is consistent with the field sampling protocols described in the Department of Toxic Substances Control's (DTSC's) *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance) (October 2011)* and DTSC's *Advisory Active Soil Gas Investigations (July 2015)*. Consistent with the guidance, ACDEH requires installation of permanent vapor wells to assess temporal and seasonal variations in soil gas concentrations.

3. LTCP General Criteria e (Site Conceptual Model), August 11, 2017 Directive Letter Technical Comment 6:

- a. ACDEH requests preparation of a SCM in a tabular format that highlights the major SCM elements and associated data gaps, which need to be addressed to progress the site to case closure under the LTCP. Please prepare an SCM similar to Attachment A, ACDEH's August 11, 2017 Directive Letter and include the SCM with the Data Gap Work Plan requested below.
- b. As a part of the SCM, please perform a Sensitive Receptor Study by reviewing Alameda County Public Works Agency (ACPWA) well data base for an inventory of vicinity water supply wells to determine if sensitive receptors are present within a radius of 2,000 feet of the site. ACDEH requests the identification and location of all irrigation, domestic water supply, and industrial wells within a 2,000-foot radius of the site on a site vicinity figure. Please identify on the same figure beneficial resources and other sensitive receptors including, but not limited to, surface water bodies, schools, hospitals, day care centers, elder care facilities, etc. Please plot the numbered well locations on an aerial photography-based figure and provide a table listing the same numbered well locations and information similar to the example provided in Attachment B, ACDEH's August 11, 2017 Directive Letter and include the table and figure with the Data Gap Work Plan requested below.
- c. Two pump islands are shown on ECG's report figures submitted to date; however, the *UST Removal Report* dated September 15, 2009 documents the existence of three pump islands at the site and the aerial photography-based Figures 3, 5, 6, and 7 of ECG's *Third Quarter 2017 Groundwater Monitoring Report* show the dark asphalt patches of the three former pump islands. Please depict the location of the third pump island on all figures in all future reports including the Data Gap Work Plan requested below.

4. Groundwater Monitoring Analyses, Technical Comment 8, August 11, 2017 Directive Letter: ACDEH's August 11, 2017 Directive Letter requested analysis of groundwater samples collected from the six site monitoring wells (MW-1 through MW-6) and four extraction wells (EW-1, EW-2, EW-3, EW-4) for Total Petroleum Hydrocarbons diesel (TPHd) because one of the USTs was used to store diesel and for naphthalene because naphthalene has not been included in the list of site analytes for either soil or groundwater and the LTCP uses naphthalene to assess risk from vapor intrusion to indoor air. However, ACDEH noted the absence of both TPHd and naphthalene analysis in the September 18, 2017 groundwater monitoring and sampling event. In accordance with the California State Resources Control Board's September 2012 *Leaking Underground Fuel*

Tank Guidance Manual (LUFT), ACDEH **requires** the following analyses by the LUFT-listed analytical method for all groundwater samples collected from the six site monitoring wells (MW-1 through MW-6) and four extraction wells (EW-1, EW-2, EW-3, EW-4) starting with the 1st Half of 2018 semiannual groundwater monitoring and sampling event and to be continued unless otherwise directed in writing by ACDEH.

- Total Petroleum Hydrocarbons Gasoline (TPHg);
- **TPH Diesel by EPA Method 8015B with low laboratory detection limits;**
- **naphthalene**, benzene, toluene, ethylbenzene, and xylenes (BTEX);
- ethylene dibromide (EDB), ethylene dichloride (EDC), methyl tertiary-butyl ether (MTBE), tert-amyl-methyl ether (TAME), ethyl tert-butyl ether (ETBE), di-isopropyl ether (DIPE), and t-Butyl alcohol (TBA) and fuel oxygenates.

As a reminder, all proposed changes to the groundwater monitoring and sampling program, including sampling periodicity and changes to groundwater sample analyses, must be approved in writing by ACDEH prior to implementation. **Non-compliance with ACDEH Directive Letters jeopardizes USTCF reimbursement and will lead to an Enforcement Letter and a Notices of Violation.**

5. **Semi-Annual Wastewater Discharge Report submittal:** The groundwater treatment system was shut down on April 11, 2016 and has not operated since then. ACDEH does not require submittal of future Semi-Annual Wastewater Discharge Reports; consequently, preparation and/or submittal of future Semi-Annual Wastewater Discharge Reports is not reimbursable by the USTCF.
6. **Electronic Submittal of Information (ESI) Compliance** - As described in ACDEH Directive Letters from 2016 to the present, review of the case file indicates that the SWRCB Geotracker database is not complete, thus rendering the site to a non-compliant status pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3890 to 3895. At present missing data and documents include, but may not be limited to:
 - complete copies of reports, in pdf format, including the signed transmittal letter and professional certification (GEO_REPORT files);
 - analytical data for soil, water and vapor samples collected for the purpose of subsurface investigation or remediation, including all influent/effluent wastewater samples collected between 2013 and 2016 from the groundwater treatment system (EDF files);
 - surveyed elevation measurements to the top of well casings including EW-3 and EW-4 (GEO_Z files);
 - the latitude and longitude (GEO_XY files) of any permanent monitoring well including EW-3 and EW-4 for which data is reported in EDF format;

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- depth-to-water information for permanent sampling points whenever the data is collected, even if the well is not sampled during the sampling event (GEO_WELL files);
- stand-alone site maps displaying tank locations, streets bordering the facility, and sampling locations for all soil, water and vapor samples (GEO_MAP files);
- stand-alone boring logs including off-site borings SB-10 through SB-21 (GEO_BORE files);

ACDEH requests e-mail notification of and a list of the documents uploaded to Geotracker. Please upload all submittals to GeoTracker website by the date specified below.

Please be aware that failure to comply with Geotracker requirements jeopardizes reimbursement from the USTCF and will delay eventual case closure.

TECHNICAL REPORT REQUEST

Please upload technical reports to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **May 20, 2018:** GeoTracker electronic submittal date for all missing ESI submittals
- **June 14, 2018:** Data Gap Investigation Work Plan and Site Conceptual Model
File to be named: RO2931_WP_SCM_R_yyyy-mm-dd
- **May 31, 2018:** Semiannual Groundwater Monitoring and Sampling Report, 1st Half 2018
File to be named: RO2931_GWM_R_yyyy-mm-dd
- **November 30, 2018:** Semiannual Groundwater Monitoring and Sampling Report, 2nd Half 2018
File to be named: RO2931_GWM_R_yyyy-mm-dd
- **May 31, 2019:** Semiannual Groundwater Monitoring and Sampling Report, 1st Half 2019
File to be named: RO2931_GWM_R_yyyy-mm-dd
- **November 30, 2019:** Semiannual Groundwater Monitoring and Sampling Report, 2nd Half 2019
File to be named: RO2931_GWM_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.

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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Sincerely,

Karel Detterman, PG
Hazardous Materials Specialist

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

cc: Drew Van Allen, Environmental Compliance Group, LLC, 270 Vintage Drive, Turlock, CA 95382
(Sent via E-mail to: ecg.ust@gmail.com)

Dilan Roe, ACDEH, (Sent via E-mail to: dilan.roe@acgov.org)
Karel Detterman, ACDEH, (Sent via E-mail to: karel.detterman@acgov.org)
Paresh Khatri, ACDEH, (Sent via E-mail to: paresh.khatri@acgov.org)
GeoTracker, eFile

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) 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 licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.