

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

COLLEEN CHAWLA, Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY, SUITE 250
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

August 24, 2018

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

Mr. Waseem Ghani Iqbal (Sent via e-mail to: paki_80@hotmail.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 and Mr. Ghani:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *First Quarter 2018 Groundwater Monitoring Report* dated June 6, 2018 (Groundwater Report), and the *Soil Vapor Survey Work Plan (Work Plan)* dated June 25, 2018, prepared on your behalf by your consultant Environmental Compliance Group, LLC (ECG). The Work Plan, also known as the *First Work Plan Addendum and Site Conceptual Model*, was requested in ACDEH's May 25, 2018 Directive Letter. The goal of the *First Work Plan Addendum and Site Conceptual Model* is to assess potential vapor intrusion to indoor air of the on-site trailer and adjacent downgradient businesses and residences due to the persistent and elevated benzene concentrations in shallow groundwater at the site, the close proximity of businesses and residential properties, and a variable groundwater gradient direction. Thank you for submitting the documents.

The case does not 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.

ACDEH understands that the property has not been sold, commercial property usage as a hand wash car wash will continue, and redevelopment is under consideration in the future.

While ACDEH generally concurs with the scope of work presented in the *Work Plan*, the proposed scope of work is approved for implementation provided that all of the modifications specifically requested in the following technical comments are addressed and incorporated during the field implementation. Submittal of a revised work plan or a work plan addendum is not required unless any alternate scope of work outside that described in the work plan or the technical comments are proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: karel.detterman@acgov.org) prior to the start of field activities. ACDEH staff will observe both the soil vapor probe installation and the soil vapor sample collection.

TECHNICAL COMMENTS - FIRST WORK PLAN ADDENDUM AND SITE CONCEPTUAL MODEL

Soil Vapor Probe Installation and Sampling:

- 1. Alameda County Public Works Agency (ACPWA) Soil Vapor Probe Installation Permits:** Obtaining ACPWA drilling permits was not mentioned in the Work Plan, however, all soil borings and wells including soil vapor probes, must be installed under ACPWA permit. For the current investigation and all future investigations, please obtain the ACPWA well permits and include the permits in an appendix of the investigation report.
- 2. Installation Depth of Soil Vapor Probe:** According to the LTCP, soil vapor samples must be collected from a depth of 5 feet bgs which must consider the thickness of the concrete slab or asphalt surface, assumed to be approximately 6-inches thick. Please install each soil vapor probe to a depth of 5.5 feet below ground surface (bgs) to and immediately adjacent to offsite buildings.
- 3. Installation Construction of Soil Vapor Probe:** Please see the Attachment 2, ACDEH's required revisions for soil vapor probe construction. This request is based on DTSC Vapor Guidance documents.
- 4. Standard Operating and Safety and Loss Control Procedures (SOPs):** Please specify the frequency at which the photoionization detector (PID) will be calibrated.
- 5. Soil Moisture Sample:** Please collect *one* soil sample from a depth of 5 feet from either SVP-2 or SVP-3, located in the vicinity of the one of the thirteen soil vapor probes and request the laboratory to determine moisture content to inform soil moisture conditions for soil vapor sample collection.
- 6. Professional Survey of Permanent Soil Vapor Probes:** The thirteen new soil vapor probes must be surveyed to Geotracker standards by a California Registered Civil Engineer or licensed professional surveyor and the survey data must be uploaded to Geotracker.
- 7. Soil Vapor Analysis by TO15 and TO17:** The Work Plan describes using nylon or Teflon tubing in the construction of the soil vapor probes. Because naphthalene readily sorbs onto traditional soil gas tubing such as polyethylene and nylaflow as described in DTSC's *Advisory Active Soil Gas Investigations* (July 2015) Appendix E, ACDEH requests analysis of all soil gas samples for TO-15 full scan volatile organic compounds (VOCs) and naphthalene confirmation analysis using EPA Method TO-17 analysis for all soil vapor samples because TO-17 will detect constituents with low vapor pressure, including naphthalene, whereas TO-15 does not readily detect constituents with low vapor pressure, including naphthalene, as described in DTSC's *Advisory Active Soil Gas Investigations* (July 2015) Appendix E.
- 8. Soil Vapor Probe Purging:** DTSC's *Advisory Active Soil Gas Investigations* (July 2015) states that a default of three purge volumes should be used.
- 9. Required Helium Analysis for Each Soil Vapor Sample:** As described in Technical Comment 2d in ACDEH's May 25, 2018 Directive Letter, the encapsulating shroud should entirely encompass the sample apparatus and surface completion of the soil vapor well or vapor pin; a minimum of 20% helium atmosphere should be maintained within the encapsulating shroud throughout the duration of purging and sampling; and shroud helium concentrations should be monitored, recorded, and reported in the field logs to be included in the appendix of the report. Helium monitoring may be conducted using a

field meter as long as the detector is capable of reporting Helium detections between 100% and 0.1% with a precision of at least +10% at 0.1%. Helium analytical results and concentrations of helium indicated as a percentage for each vapor sample must be included on the soil vapor analytical results summary tables.

Soil Vapor Investigation Report and Updated Site Conceptual Model:

- 10. Comparison to Appropriate Environmental Screening Levels (ESLs):** The Work Plan states that soil vapor results will be compared to commercial indoor air ESLs; however, it is more appropriate to compare the soil vapor results to the soil vapor ESLs found in the most recent version (Version 3 February 2016) of the San Francisco Bay Regional Water Quality Control Board's (SFBRWQCB's) *Environmental Screening Levels* (ESLs).
- 11. Basement Survey of Neighboring Properties:** ACDEH requests documentation of visual observations (photos) of windows and stairs which may indicate the presence of basements or half basements at the residence at 1138 4th Avenue and at the Cosmetology School located at 415 E. 12th Street. Please include with the Sensitive Receptor Survey Section described below.
- 12. Submittal of Boring Logs:** ACDEH requests submittal of boring logs and soil vapor well construction diagrams for each of the thirteen soil vapor probes. On all boring logs, ACDEH requests the following information including, but not limited to, lithologic descriptions using the industry standard United Soil Classification System (USCS), depth to the bottom of the boring, depth to first encountered groundwater and if groundwater is not encountered, please state that information, depths at which soil/groundwater samples were collected, photoionization detector PID readings at all depths, staining, odor, soil color changes. Please note that all borings, regardless of depth, must be graphically represented by a boring log, and all boring logs must be included in the soil and groundwater investigation report requested below. Additionally, as a condition of Alameda County Public Works Agency's Permit, PDF's of all borings and monitoring well logs must be uploaded to Geotracker as Geo_Bores.
- 13. Sensitive Receptor Survey Completion:** As a part of the SCM, please complete the Sensitive Receptor Survey 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 *Soil Gas Investigation Report* requested below.
- 14. Accurate Depiction of Three Pump Islands on all Site Figures:** Please depict the location of the third pump island on all figures in all future reports including the *Soil Gas Investigation Report* requested below. 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 *First Quarter 2018 Groundwater Monitoring Report* show the dark asphalt patches of the three former pump islands.

ACDEH has requested the accurate portrayal of the former pump islands since the August 2017 Directive Letter.

TECHNICAL COMMENTS - SEMIANNUAL GROUNDWATER MONITORING AND SAMPLING REPORT

- 1. Missing Analytical Results for TPHd:** ACDEH noted that the requested TPHd analytical results were not included in the Groundwater Report although it had been requested on the chain of custody for the March 30, 2018 semi-annual sampling event. During a telephone conversation ECG, it was determined that insufficient number of groundwater sampling containers were submitted to the laboratory on which to analyze for TPHd and consequently, TPHd was not analyzed. This oversight was not discussed in the semi-annual report, however a discussion of the oversight must be included in the next semi-annual sampling event scheduled to occur at the end of September 2018 in addition to analytical results for TPHd from the September 2018 semi-annual event.
- 2. Geotracker Electronic Submittal of Information (ESI) Compliance:** Please be aware that failure to comply with Geotracker requirements will jeopardize 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:

- **October 24, 2018:** Soil Vapor Investigation Report and Updated Site Conceptual Model
File to be named: RO2931_SWI_SCM_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.

Mr. Rashid Ghafoor and Mr. Waseem Ghani Iqbal
RO0002931
August 24, 2018
Page 5

Sincerely,

Karel Detterman, PG
Senior Hazardous Materials Specialist

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

Attachment 2 - ACDEH's required revisions for soil vapor probe construction

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

Michael Sgourakis, Environmental Compliance Group, LLC, 270 Vintage Drive, Turlock, CA 95382
(Sent via E-mail to: mr.e.meat@hotmail.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>.

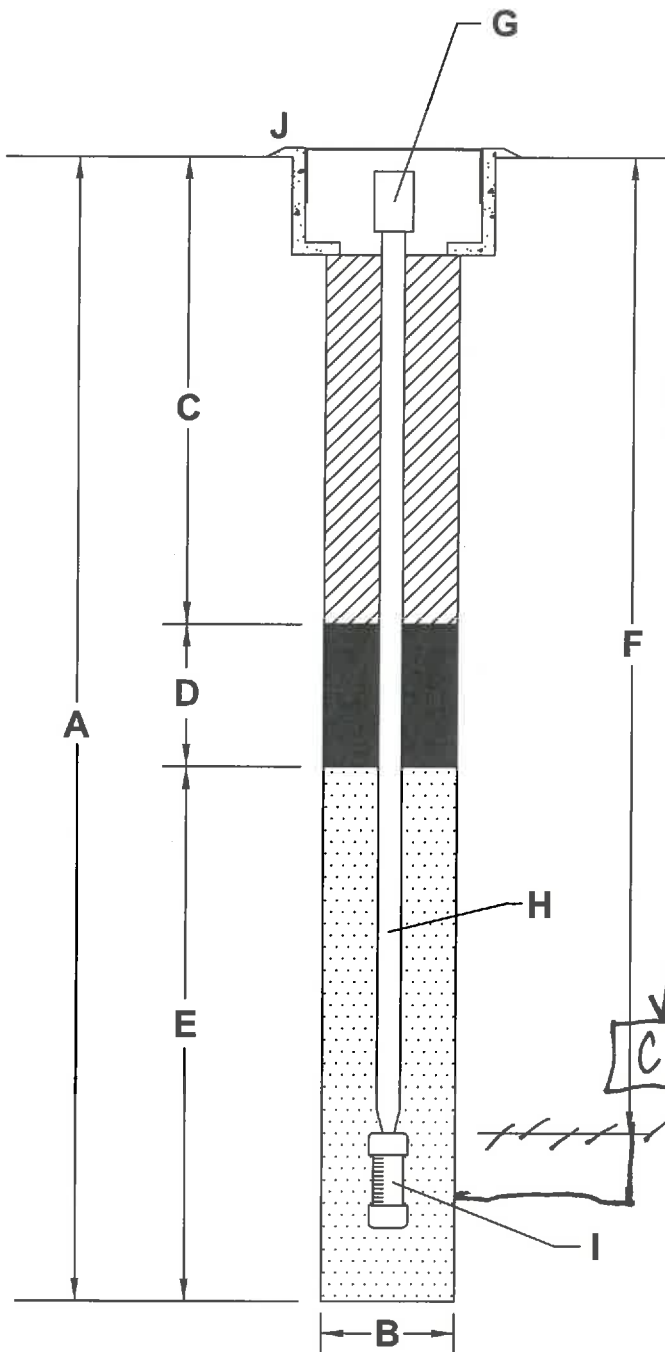
UNDERGROUND STORAGE TANK CLEANUP FUND

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.

ATTACHMENT 2



A Total Depth Of Boring 5.5 ft.

B Diameter Of Boring 2 in.
Drilling Method Hand Auger

C Sanitary Seal From 0 to * 3.5 ft.
Seal Material Hydrated Granular Bentonite *see below*

D Seal From * 3.5 to * 4.5 ft.
Seal Material Dry Granular Bentonite

E Filter Pack From 4.5 to * 5.5 ft.
Pack Material No. 3 Lonestar Sand

F Depth To Probe 5 ft.

G Gas Tight Valve

H 1/8" To 1/4" Tubing *specify material*

I Probe Tip (1/2" Sch 40 Well Screen)

J 8-inch Diameter Traffic Rated Christy Box

* Depths To Be Determined From Site Lithology

C. Seal Material = Neat cement grout w/ up to 5% bentonite powder

FIGURE 4

Project Number:
GHA.19009

Date:
June 2, 2018

PROPOSED SOIL VAPOR PROBE
CONSTRUCTION DETAIL

Shore Acres Gas
403 East 12th Street
Oakland, California

 Environmental
Compliance
Group, LLC
270 Vintage Drive, Turlock, CA 95382
Phone: (209) 664-1035