



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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June 26, 2015

Glen D. Logan Trust
Automasters
6200 Shattuck Avenue
Oakland, CA 94609-1237

Ali R. Khashabi
c/o Dorothy Elder
4 Garden Estates Court
Alamo, CA 94507-1129

6200 Shattuck Partnership, LLC
15 Mulberry Court No. 15
Belmont, CA 94002
Sent by e-mail to:
johnnywgroup@gmail.com

Subject: Technical Report Request for Fuel Leak Case RO0002935 and GeoTracker Global ID
T0619748201 Automasters, 6200 Shattuck Avenue, Oakland, CA 94609-1237

Ladies and Gentlemen:

Alameda County Environmental Health (ACEH) has reviewed the case file including the *Site Conceptual Model and Remedial Work Plan* (WP-SCM) dated March 27, 2015 prepared by West Associates Environmental Engineers, Inc. (West) on behalf of 6200 Shattuck Partnership, LLC. Thank you for submitting the WP-SCM.

ACEH has evaluated the data and recommendations presented in the WP-SCM in conjunction with the case files, and the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) adopted in 2012. Based on ACEH staff review, we have determined that the site fails to meet the LTCP General Criteria d (Free Product), 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 Attachment A for a copy of the LTCP checklist). Please refer to ACEH's November 24, 2014 Directive Letter for the details on the LTCP analysis.

We request that you address the following technical comments and send us the technical report requested below.

TECHNICAL COMMENTS

Request for a Work Plan Addendum and Revised SCM – The WP-SCM addresses a few elements of ACEH's November 24, 2014 directive letter; however, the WP-SCM doesn't address the majority of data gaps identified in the directive letter. This letter is a request to provide the missing items in a work plan addendum:

- 1. Potential Source Areas:** The proposed soil and shallow soil boring locations do not appear to be adequately placed to investigate potential source areas including the dispenser island, the location and status of the underground storage tank (UST) piping between the USTs and dispenser island, the fill ports, and the three objects labeled "Oil Storage". Please add or relocate

the borings to investigate these potential sources or provide data to support the option to not investigate these potential release locations as previously described. See Technical Comments 2 for required soil and groundwater analyses based on site history and contaminant use.

- 2. Uninvestigated and Unreported Waste Oil Storage:** The WP-SCM's *Introduction* indicates that the site is currently used as automotive repair facility which may include waste oil storage. Because of the potential for site redevelopment, please investigate the "Oil Storage" locations for shallow waste oil spills and please revise the soil and groundwater sample collection strategy to include analysis of PAHs, naphthalene, chlorinated solvents, and wear metals that are typically associated with a waste oil storage. Please address the data gaps identified above in the requested Work Plan Addendum requested by the data identified below.
- 3. Analytical Suite:** The Work Plan refers to the *North Coast Region Guidelines* but should instead refer to the LTCP. Additionally, all grab groundwater and soil samples should be analyzed for Total Petroleum Hydrocarbons as gasoline (TPHg), TPH as diesel (TPHd), and TPH motor oil (TPHmo) by modified EPA 8015, and full scan volatile organic compounds (VOCs) including naphthalene by EPA Method 8260B, and if a waste oil UST was present, soil samples should be analyzed for semi-volatile organic compounds (SVOCs) by EPA Method 8270 Selected Ion Monitoring (SIM) mode, to address the data gaps identified above. Please include SOPs for the use of appropriate soil sampling technology in an appendix.
- 4. Groundwater Flow Direction and Plume Delineation:** An estimated groundwater gradient direction was not provided in the SCM but ACEH's data review of three adjacent fuel leak cases, RO0003066 at 6501 Shattuck Avenue, Oakland, RO0000078 at 6407 Telegraph Avenue, Oakland, and RO0000005 at 6125 Telegraph Avenue, Oakland, suggest that the local groundwater gradient direction is towards the southwest. Installation of groundwater monitoring wells appear reasonable; alternatively, it may be possible to delineate the groundwater plume with a soil boring and/or grab groundwater transect placed on 15-20 foot centers, followed by select well installation at the soil bore indicating the highest groundwater concentration along Shattuck Avenue and 62nd Street. If installation of monitoring wells is proposed, ACEH recommends a wider spacing of the site monitoring wells to provide a better site-wide groundwater gradient direction. Please provide a revised figure indicating revised proposed monitoring wells and soil sampling locations.
- 5. Soil Sample Collection and Analysis:** To satisfy the LTCP, Soil samples must be collected from each soil borings between the 0 to 5 and 5 to 10-foot interval. ACEH additionally requests soil samples to be collected at the groundwater interface, lithologic changes, and at areas of obvious impact to define the vertical and lateral extent. In each boring location, please analyze soil samples collected from the 0 to 5 foot and 5 to 10 foot intervals for the analyses requested in Technical Comment 3.

Thank you for utilizing ACEH's suggested SCM in tabular form. The following comments refer to Table 1, Table 2, and the Figures of the WP-SCM:

- 6. Well Survey Request:** Please perform a Well Survey utilizing Alameda County Public Works Agency (ACPWA) in addition to DWR resources as these two databases are sufficiently different to warrant a review of both. Please refer to Attachment A, *Preferential Pathway and Sensitive*

Receptor Study and Attachment B, Sample Well Survey and Table to address this data gap in the Work Plan Addendum.

7. **Report Figures:** Please include in all future reports a site map showing the location of the former USTs, the fill pipe, all UST system appurtenances, and potential source areas. Please also include in all future reports an extended site map to scale using an aerial photographic base map to depict both the site and immediate vicinity to facilitate understanding the site and surrounding vicinity. Please be aware of the importance of including a bar scale on all report figures.

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 according to Attachment 1 by the following schedule and file-naming convention:

- **August 28, 2015** – Data Gap Investigation Work Plan Addendum and Site Conceptual Model
File to be named: RO2935_WP_ADEND_SCM_R_yyyy-mm-dd

This report is 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>.

Thank you for your cooperation. 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. 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.

Sincerely,

Karel Detterman, PG
Hazardous Materials Specialist

Enclosures: Attachment A - Preferential Pathway and Sensitive Receptor Study
Attachment B – Sample Well Survey and Table

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

cc: Bruce Jacobsen, West & Associates, (Sent via E-mail to: bjacobsen@astound.net)
Dilan Roe, ACEH (Sent via E-mail to: dilan.roe@acgov.org)
Karel Detterman, ACEH (Sent via E-mail to: karel.detterman@acgov.org)
GeoTracker, Electronic Case File

ATTACHMENT A

Preferential Pathway and Sensitive Receptor Study

Please conduct a study as a part of the SCM requested in order to (1) locate potential anthropogenic migration pathways on and in the vicinity of the site that could spread contamination through vertical and lateral migration, and (2) identify exposure scenarios and sensitive receptors that are linked to site contamination through these preferential pathways. The results of your study shall contain all information required by California Code of Regulations, Title 23, Division 3, Chapter 16, §2654(b) including but not limited to the following components, as applicable to the site:

- a. **Utility Survey** - An evaluation of all existing subsurface utility lines, laterals, and trenches including sewers, electrical, fiber optic cable, cable, water, storm drains, trench backfill, etc. within and near the site and plume area(s). Please include an evaluation of shallow utilities associated with current and historical site operations/processes including UST systems, remediation systems, parts cleaning, sumps, etc.
- b. **Updated Well Survey** – ACEH requests that well data sources (Alameda County Public Works Agency [ACPWA] and Department of Water Resources [DWR]) be reviewed for more recently installed vicinity water supply wells. ACEH requests the identification of all active, inactive, standby, decommissioned (sealed with concrete), unrecorded, and abandoned (improperly decommissioned or lost) wells including monitoring, remediation, irrigation, water supply, industrial, livestock, dewatering, and cathodic protection wells within a ¼-mile radius of the subject site. Please inspect all available Well Completion Reports filed with the DWR and ACPWA in your survey, and perform a background study of the historical land uses of the site and properties in the vicinity of the site. Use the results of your background study to determine the existence of unrecorded/unknown (abandoned) wells, which can act as contaminant migration pathways at or from your site.
- c. **Land Uses and Exposure Scenarios on the Facility and Adjacent Properties** – The surrounding land use appears to be predominately agricultural; however, redevelopment of the site as a service station has been planned. Consequently, the identification of existing and future land use on and in the vicinity of the site is requested, including:
 - o Beneficial resources (e.g., groundwater classification, wetlands, surface water bodies, natural resources, etc.)
 - o Subpopulation types and locations (e.g., schools, hospitals, day care centers, elder care facilities, etc.)
 - o Exposure scenarios (e.g. residential, industrial, recreational, farming) and exposure pathways including those identified in the Low Threat Underground Storage Tank Case Closure Policy General Criteria h – Nuisance Conditions, and Media-Specific Criteria for Groundwater, Vapor Intrusion to Indoor Air, and Direct Contact and Outdoor Air Exposure
- d. **Planned Development** – Future development activities are planned in the vicinity of the site. Please include an analysis of new utility corridors, building foundations, wells, and/or development activities that could significantly alter contaminant migration (i.e., covering of large areas of the site with pavement, etc.).

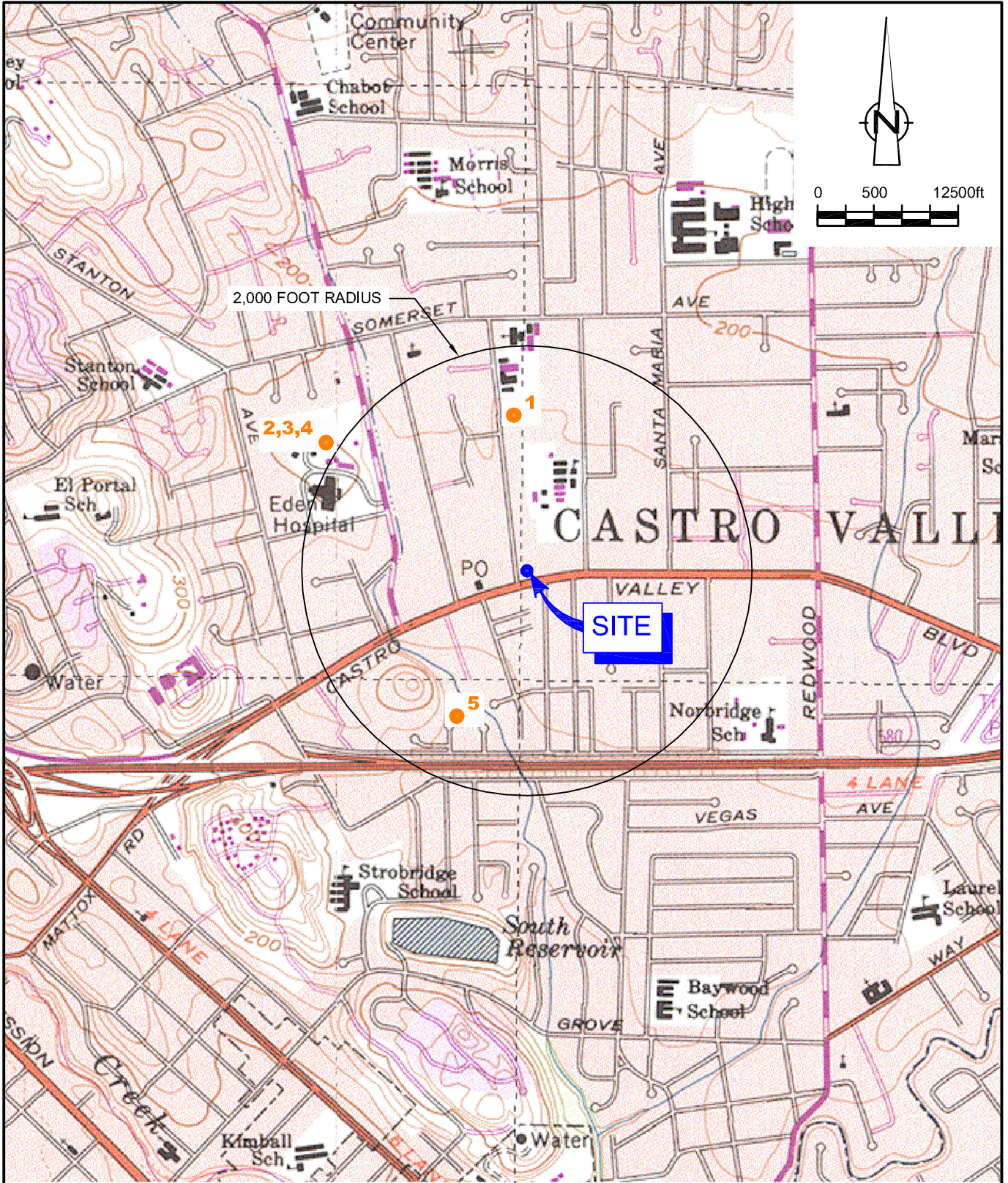
Please synthesize this information and discuss your analysis and interpretation of the results of the preferential pathway and sensitive receptor study and incorporate into the requested SCM. Please provide the following supporting documentation and data as applicable:

- Copies of current and historical maps, such as site maps, Sanborn maps, aerial photographs, etc., used when conducting the background study.
- DWR well logs, marked as confidential, uploaded to Alameda County Environmental Health's ftp site. For confidentiality purposes do not upload the DWR well logs to Geotracker. The well logs will be placed in our confidential file and will be available only to internal staff for review.
- Table with details of the well search findings including Map ID corresponding to well location on map, State Well ID, Well Owner ID, approximate distance from the site, direction from the site, use, installation date, depth (feet below ground surface [bgs]), screened interval (feet bgs), sealed interval (feet bgs), diameter (inches), and well location address.
- Maps and geologic cross-sections illustrating historical groundwater elevations and flow directions (rose diagram) at the site. Synthesize the data requested above and include the location and depth of all utility lines, trenches, UST pits and piping trenches, wells, surface water bodies, foundational elements, surface covering types (pavement, landscaped, etc.) within and near the site and plume area(s), and the location of potential receptors.

ATTACHMENT B

**WELL SURVEY RESULTS
 CHEVRON STATION 9-6991
 2920 CASTRO VALLEY BOULEVARD
 CASTRO VALLEY, CALIFORNIA**

<i>Well No./ Figure ID</i>	<i>Well Owner</i>	<i>Well Address Street</i>	<i>City</i>	<i>Total Well Depth (ft)</i>	<i>Date Installed</i>	<i>Distance/Direction from Site (ft) (approx)</i>	<i>Well Use</i>
1	Private	20036 Anita Avenue Lake Chabot Road	Castro Valley	51	2/19/1953	1,400 N	Domestic
2	Eden Township Hospital	1,000' south of Williams	Castro Valley	150	9/30/1953	2,000 NW	Test well
3	Eden Township Hospital	Eden Township Hospital	Castro Valley	250	9/9/1952	2,000 NW	Domestic
4	Eden Township Hospital	Eden Township Hospital	Castro Valley	60	7/11/1952	2,000 NW	Cooling system return
5	Sam Wallace	Tyee Court	Castro Valley	52	7/3/1953	1,400 S-SW	Domestic



SOURCE: TOPO! MAPS.

LEGEND

- APPROXIMATE WELL LOCATION



WELL SURVEY MAP
CHEVRON SERVICE STATION 9-6991
2920 CASTRO VALLEY BOULEVARD
Castro Valley, California

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to 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 Instructions." 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. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all 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 monitoring wells, and other data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

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.

REQUIREMENTS

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- **Signature pages and perjury statements must be included and have either original or electronic signature.**
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Submission Instructions

- 1) Obtain User Name and Password
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to deh.loptoxic@acgov.org
 - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses**, and the **Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to deh.loptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.