

ALAMEDA COUNTY  
**HEALTH CARE SERVICE AGENCY**  
REBECCA GEBHART, Interim Agency Director



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November 29, 2016

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](mailto:johnnywgroup@gmail.com))

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

Ladies and Gentlemen:

Thank you for the *Data Gap Investigation Work Plan and Updated Site Conceptual Model (Work Plan)* dated August 18, 2016 prepared by West Associates Environmental Engineers, Inc. (West) on behalf of 6200 Shattuck Partnership, LLC. Alameda County Department of Environmental Health (ACDEH) staff reviewed the case file including the Work Plan (received on October 3, 2016) for the site.

According to the case file, in 1986, two former underground storage tanks (USTs) were removed from the site; however, there appears to be no documentation from the UST removal. The two former USTs and a dispenser island were presumably located in the south and southwest portion of the site. ACDEH understands that an auto repair shop is currently in operation on the east side of the property and will continue operation after redevelopment. The western portion will be redeveloped with two buildings: a commercial-only building at the corner of Shattuck and 62<sup>nd</sup> Street and a mixed use residential/commercial building along Shattuck Avenue.

ACDEH has evaluated the data and recommendations presented in the Report in conjunction with the case files, and the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). As communicated in the June 2016 Directive Letter, based on ACDEH staff review, we have determined that the site does not meet the LTCP General Criteria d (Free Product), 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. Based on ACDEH staff review of the case file and the referenced report ACDEH requests that you address the following technical comments and send us the document requested below.

### **TECHNICAL COMMENTS**

**Request for a Work Plan Addendum** – The referenced work plan proposes a series of actions with which ACDEH is in general agreement; however, in the interest of maximizing efficiency of the drilling event, ACDEH first requests submittal of a Work Plan Addendum for approval that will address the following concerns:

- 1. Proposed Soil Borings Locations in Immediate Source Area:** The potential presence of additional secondary source in the vicinity of the former pump island and underground storage tanks (USTs) may be indicated by the silty gravel encountered in SB-2 between 5 to 11 feet

below ground surface (bgs) which coincides with the typical burial depth of a UST. The silty gravel may indicate the existence of another former UST pit or possibly a lack of precision of the locations of the former USTs and dispenser. Please be aware that prior to the 1990's, it was common practice to backfill an empty UST excavation with the soil removed during the UST removal without regard to the contamination extent.

- a. ACDEH agrees with the proposed locations of soil borings SB-8, SB-10, SB-11, and SB-12. However, to assess for the presence of secondary source in the vicinity of the former pump island and USTs, in the Work Plan Addendum, please provide a figure showing the addition of a soil boring location in the middle of each former UST location and at the northwest end of the former dispenser island. Please collect soil samples from each of the soil borings within the 0 to 5 and 5 to 10-foot intervals, in the native soil below the presumed UST backfill, and at the soil groundwater interface, and analyze all soil samples as proposed in the Work Plan.
  - b. ACDEH agrees with the installation of soil boring proposed SB-9; however, based on previous discussions, SB-9 appears to be misplaced on Figure 6. In the Work Plan Addendum, please provide a figure which shows SB-9 re-located to the southern end of the most eastern former UST as proposed in the Work Plan.
  - c. ACDEH agrees with the proposed soil borings in the vicinity of B-1, B-2, and B-7 to assess the former waste oil tanks; however the proposed locations were not included on the Figure 6. In the Work Plan Addendum, please provide a figure which shows the proposed locations. Additionally, please include a soil boring location adjacent to the waste oil storage vessel inside the structure; collect soil samples as proposed in the Work Plan.
2. **Proposed Groundwater Monitoring Wells:** The new on-site wells indicate a west-southwest groundwater gradient direction and elevated Total Petroleum Hydrocarbons as Gasoline (TPHg), naphthalene, and benzene concentrations in MW-101 and MW-103. While ACDEH is in general agreement with the concept of additional groundwater monitoring well installation, to satisfy the LTCP Groundwater Specific Criteria by defining the off-site and down gradient extent of TPH impact, it would be preferable to collect grab groundwater samples via a line of direct push borings located in the parking lane of Shattuck Avenue in front of the site, to the west-southwest downgradient of the site on the west side of Shattuck Avenue, and in the parking lane of 62<sup>nd</sup> Street along the south edge of the site. Installation of additional monitoring wells is currently not approved. Definition of an off-site plume will additionally serve to inform the potential for vapor intrusion to indoor air in the residences with basements downgradient of the site. In the Work Plan Addendum, please propose an adequate number of soil boring/grab groundwater samples to achieve the requested coverage. Please provide a description of collection of grab groundwater samples in the event of slow groundwater recharge by use of temporary wells.
  3. **Proposed Soil and Groundwater Laboratory Analyses:** ACDEH agrees with the proposed soil and groundwater analytical methods; however to ensure that the detection levels of Poly Aromatic Hydrocarbons (PAHs) are below the concentrations specified in the LTCP for Direct Contact and Outdoor Air Exposure, please request analysis of all soil samples for EPA Method 8270 with the Selected Ion Monitoring (SIM) mode.
  4. **Requested Boring Log Detail:** Please submit boring logs for all soil borings regardless of depth to ACDEH and Geotracker. On all boring logs, please provide the following information including, but not limited to, a boring log legend, lithologic descriptions using the industry standard United

Soil Classification System (USCS), depth to the bottom of the boring, depth to first encountered groundwater and depth to stabilized groundwater, and if groundwater is not encountered, please state that information, depths at which soil/groundwater samples were collected, PID reading at all depths, staining, odor, soil color changes, and indication of fill such as plastic bits, brick, etc.

5. **Geophysical Survey:** ACDEH agrees with performing a geophysical survey in the southern portion of the site. In the Work Plan Addendum, please provide a figure showing the extent of the geophysical survey including the vicinity of SB-2. Please include with the Work Plan Addendum a contingency plan to remove and sample USTs and/or product lines in the event of their discovery.
6. **Utility Survey:** To determine if underground utilities are acting as preferential pathways, ACDEH additionally suggests contacting the City of Oakland to obtain maps of utility locations and utility installation depths. Please include with the Work Plan Addendum a description of the proposed procedure to determine utility locations in the event utility location maps are not available.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACDEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **January 31, 2017** – Data Gap Work Plan Addendum and Updated 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, ACDEH 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](mailto:karel.detterman@acgov.org) or call me at (510) 567-6708.

Sincerely,

Karel Detterman, PG  
Hazardous Materials Specialist

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

cc: Bruce Jacobsen, West & Associates, P.O. Box 5891, Vacaville, CA 95696 (Sent via E-mail to: [bjacobsen@astound.net](mailto:bjacobsen@astound.net))  
Dilan Roe, ACDEH (Sent via E-mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))  
Karel Detterman, ACDEH (Sent via E-mail to: [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org))  
Paresh Khatri, ACDEH (Sent via E-mail to: [pariah.khatri@acgov.org](mailto:pariah.khatri@acgov.org))  
GeoTracker, Electronic Case File

## 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/](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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> May 15, 2014
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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](mailto: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](mailto: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.