ALAMEDA COUNTY
HEALTH CARE SERVICE AGENCY
REBECCA GEBHART, Interim Agency 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

January 23, 2017

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

Ladies and Gentlemen:

Thank you for participating in a conference call with Alameda County Department of Environmental Health (ACDEH) staff on January 12, 2017. The purpose of the call was to discuss the *Data Gap Work Plan Addendum and Updated Site Conceptual Model* (Addendum) dated December 30, 2016 prepared by West Associates Environmental Engineers, Inc. (West) on behalf of 6200 Shattuck Partnership, LLC and identify the next steps to progress the case to closure.

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. An auto repair shop is currently in operation on the east side of the property. ACDEH understands that while the new property owner, 6200 Shattuck Partnership, LLC, has conceptual plans to redevelop the property, ACDEH will continue to evaluate site data under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). As communicated in the November 29, 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.

TECHNICAL COMMENTS

1. **Suggested Soil Boring Locations:** During our conference call, we reviewed Figure 6 of the Addendum and suggested relocation of several proposed soil borings to better satisfy the LTCP data gaps. The suggested locations are shown on the attached *Conference Call Proposed Boring Locations Figure 6* and the rationale supporting the relocation of the borings is shown in the following table. If you are in agreement with the proposed locations, please e-mail a Revised Figure 6. Upon e-mail submittal to and e-mail confirmation by ACDEH of a Revised Figure 6, the Addendum is approved for implementation. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan addendum is proposed. We request that you perform the proposed work, and send us the technical data in 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.

Boring Designation	Change from 12/30/2016 Addendum Figure 6	Location Rationale	Suggested Sample Collection
S-8	Move slightly to east	Upgradient location of East UST	soil & groundwater
S-9	Move between two USTs	Between East & West USTs	soil & groundwater
S-10	Move near Sanitary Sewer	Cross/upgradient of East UST	soil & groundwater
S-11	Move upgradient of Dispenser Island	Cross/upgradient of Dispenser Island	soil & groundwater
S-12	No change	Downgradient of West UST and Dispenser Island	soil & groundwater
S-13	No change	Vertical definition through East UST location;	soil & groundwater
S-14	No change	Vertical definition through West UST location;	soil & groundwater
S-15	No change	Down/Cross Gradient Dispenser Island	soil & groundwater
S-16	Move to southwest corner of property	Downgradient West UST and Dispenser Island & property corner	soil & groundwater
S-17	Added location in 62nd Street	Downgradient off site in 62nd Street	groundwater but add soil if impacts observed
S-18	Added location in 62nd Street	Downgradient off site in 62nd Street	groundwater but add soil if impacts observed
S-19	Added location in Shattuck Avenue	Downgradient off site in Shattuck Avenue	groundwater but add soil if impacts observed
S-20	Added location in Shattuck Avenue	Downgradient off site in Shattuck Avenue	groundwater but add soil if impacts observed

2. Soil and Groundwater Analyses: During our conference call, we suggested the following changes to the soil and groundwater sampling protocol described in the Addendum:

a. Soil and groundwater samples collected from on-site soil borings: As discussed during our conference call and proposed in the Work Plan Addendum, please collect soil samples from all on-site soil borings from 0 to 5 and 5 to 10 feet intervals, at the groundwater interface, lithologic changes, and at areas of obvious impact (such as staining, odor, Photoionization Detector (PID) readings, soil color changes. In suspected fill locations such as the former UST areas, please collect soil samples at the fill/native material interface to provide vertical delineation. Please analyze the soil samples for full scan EPA Method 8260B in addition to Total Petroleum Hydrocarbons as gasoline (TPHg), TPH as Diesel (TPHd), TPH as Motor Oil (TPHmo), benzene, toluene, ethylbenzene, and xylenes (BTEX), methyl tert-butyl ether (MTBE), naphthalene, and fuel oxygenates, and Poly Aromatic Hydrocarbons (PAHs) by EPA Method 8270 with the Selected Ion Monitoring (SIM) mode to ensure that the results are below the concentrations specified in the LTCP for Direct Contact and Outdoor Air Exposure. Please collect grab groundwater samples from all on-site borings.

b. Grab Groundwater samples collected from off-site soil borings: As discussed during our conference call, please collect grab groundwater samples from the four off-site soil borings. Additionally, please collect soil samples if areas of obvious impact (such as

staining, odor, Photoionization Detector (PID) readings, soil color changes) are observed during the drilling of the off-site soil borings. Please analyze the grab groundwater samples for full scan EPA Method 8260B in addition to TPHg, TPHD, TPHmo, BTEX, and MTBE, naphthalene, and fuel oxygenates. If soil samples are collected, please analyze the soil samples in accordance with the on-site soil boring sample protocol described in Technical Comment 2a.

3. **Groundwater Monitoring Data:** To provide clear groundwater gradient and concentration trends, please include a table summarizing historical and current groundwater monitoring data with all future reports. As shown in Attachment 3, *Sample Groundwater Monitoring Data Summary Table* please include the columns listing the well designation, the sampling date, top of casing elevation in feet, the depth to water, the groundwater elevations, site specific contaminants of concern (COCs), thickness of free product, and concentration units. Additionally, please include a rose diagram indicating groundwater gradient direction.

TECHNICAL REPORT REQUEST

As discussed during the conference call, to expedite review, upon completion of the field work and receipt of all soil and groundwater analytical results, please submit the boring logs, figures, and summary tables of historical and new soil and groundwater analytical results to karel.detterman@acgov.org. We will schedule a meeting to discuss the findings and next steps.

- **March 31, 2017 –** Schedule Meeting to discuss investigation results

After our meeting, ACDEH will provide a Directive Letter with technical comments discussed during the meeting and a submittal due date for the Soil and Groundwater Report to the ACDEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's Geotracker website. 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. 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

Digitally signed by Karel Detterman
DN: cn=Karel Detterman, o, ou, email=karel.detterman@acgov.org, c=US
Date: 2017.01.23 17:35:10 -08'00'

Karel Detterman, PG
Hazardous Materials Specialist

Enclosures: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations
ACDEH Electronic Report Upload (ftp) Instructions
Attachment 2 - *Conference Call Proposed Boring Locations Figure 6*
Attachment 3 - *Sample Groundwater Monitoring Data Summary Table*

cc: Bruce Jacobsen, West & Associates, P.O. Box 5891, Vacaville, CA 95696 (Sent via E-mail to: bjacobsen@astound.net)
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 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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) 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 File Transfer Protocol (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 SCP 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 (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/) for more information on these requirements.

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 ACDEH's FTP server and the SWRCB's GeoTracker website." 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 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. 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 case meet this requirement. 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

Please note that delays in investigation, late 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 SCP)	**REVISION DATE:** December 1, 2016
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
SECTION: Miscellaneous Administrative Topics & Procedures	**SUBJECT:** Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) 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) Open File Explorer using the Windows  key + E keyboard shortcut.
      i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
   b) On the address bar, type in ftp://alcoftp1.acgov.org.
   c) Enter your User Name and Password. (Note: Both are Case Sensitive)
   d) Click Log On.
   e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
   f) 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.

ATTACHMENT 2

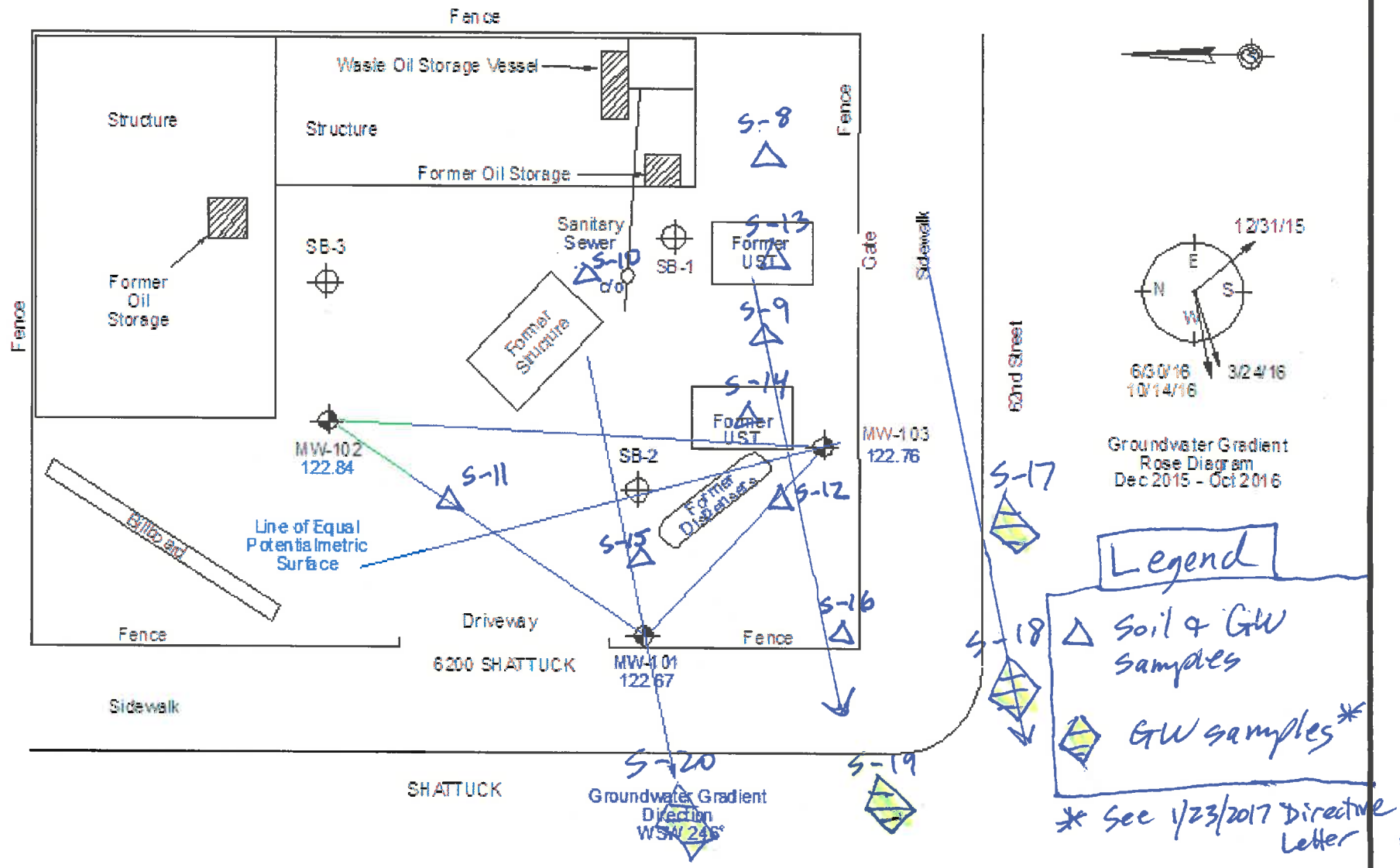
Attachment 2 Conference Call Proposed Boring Locations Fig. 6

WEST & ASSOCIATES ENVIRONMENTAL ENGINEERS
PO Box 5891, Vacaville, CA 95696

Project Name: Automasters	Date: Oct 2016
Location: 6200 Shattuck Avenue, Oakland, CA	
Drawing By: DLG	Scale: NS

Legend
- Monitoring Well
- Well Triangle
- Line of Equal Potentiametric Surface
- Groundwater Gradient Direction
- 122.67 Groundwater Elevation Relative to MSL

FIGURE 4
Groundwater Elevations & Gradient
October 4, 2016



ATTACHMENT 3

Table 1
Historical Groundwater Elevations & Analytical Data
TPH-g, BTEX, MtBE
3519 Castro Valley Blvd, Castro Valley, CA

Monitoring Well	Date	Top of casing elevation [1] (feet)	Depth to Groundwater (feet)	Groundwater Elevation (feet)	Observed Sheen	TPH-g (µg/L) 8260B	Benzene (µg/L)	Toluene (µg/L)	Ethyl benzene (µg/L)	Total Xylenes (µg/L)	MtBE (µg/L) 8260B
MW-6R	8/30/2010	181.34	9.55	171.79	-	<50	<0.5	<0.5	<0.5	<0.5	<0.5
	11/15/2010	181.34	9.32	172.02	-	<50	<0.5	<0.5	<0.5	<0.5	<0.5
	2/14/2011	181.34	9.79	171.55	-	<50	<0.5	<0.5	<0.5	<0.5	<0.5
	7/19/2011	181.34	9.60	171.74	-	<50	<0.5	<0.5	<0.5	<0.5	<0.5
	1/18/2012	181.34	10.08	171.26	-	<22	<0.33	<0.19	<0.15	<0.2	<0.38
	7/10/2012	181.34	10.30	171.04	-	<50	<0.5	<0.5	<0.5	<0.5	<0.5
	1/9/2013	181.34	9.50	171.84	No Sheen	<50	<0.5	<0.5	<0.5	<0.5	<0.5
	7/8/2013	181.34	10.29	171.05	No Sheen	<50	<0.5	<0.5	<0.5	<0.5	<0.5
	1/29/2014	181.34	11.01	170.33	No Sheen	<50	<0.5	<0.5	<0.5	<0.5	<0.5
	7/24/2014	181.34	11.00	170.34	No Sheen	<50	<0.5	<0.5	<0.5	<0.5	<0.5
	1/19/2015	181.34	10.39	170.95	No Sheen	<50	<0.5	<0.5	<0.5	<0.5	<0.5
	7/20/2015	181.34	10.98	170.36	No Sheen	<50	<0.5	<0.5	<0.5	<0.5	<0.5
	1/18/2016	181.34	8.95	172.39	No Sheen	<50	<0.5	<0.5	<0.5	<0.5	<0.5
MW-7	7/28/1995	176.55	9.25	167.30	-	<50	0.54	0.54	<0.50	<1.0	NA
	11/17/1995	176.55	9.73	166.82	-	1100	<10	<10	<10	<20	4000
	2/7/1996	176.55	6.48	170.07	-	610	<0.50	<1.0	<1.0	<1.0	2500
	2/7/1996	176.55	NM	NM	-	280	<0.50	<1.0	<1.0	<1.0	2600
	4/23/1996	176.55	8.37	168.18	-	110	<0.50	<1.0	<1.0	<1.0	3500
	4/23/1996	176.55	NM	NM	-	230	<0.50	<1.0	<1.0	<1.0	3500
	7/9/1996	176.55	9.24	167.31	-	230	<0.50	<1.0	<1.0	<1.0	4296
	7/9/1996	176.55	NM	NM	-	220	<0.50	<1.0	<1.0	<1.0	4400
	10/10/1996	176.55	10.05	166.50	-	NA	NA	NA	NA	NA	NA
	10/11/1996	176.55	NM	NM	-	1600	<0.50	<1.0	<1.0	<1.0	3000
	1/20/1997	176.55	7.51	169.04	-	<50	0.63	<1.0	<1.0	<1.0	2600
	4/25/1997	176.55	8.79	167.76	-	NA	NA	NA	NA	NA	NA
	4/28/1997	176.55	NM	NM	-	1500	<0.50	<1.0	<1.0	<1.0	3600
	4/28/1997	176.55	NM	NM	-	7700	3500	<25	74	37	<250
	7/18/1997	176.55	9.50	167.05	-	1400	<0.50	<1.0	<1.0	<1.0	2600
	10/27/1997	176.55	9.19	167.36	-	420	<0.50	<1.0	<1.0	<1.0	560