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

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## 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

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: <a href="mailto:johnnywgroup@gmail.com">johnnywgroup@gmail.com</a>)

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:

 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