

**From:** [Detterman, Karel, Env. Health](#)  
**To:** [Jesse Barajas](#)  
**Cc:** "[Lieberman, Gary A](#)"; [dehloptoxic, Env. Health](#); [Roe, Dilan, Env. Health](#)  
**Bcc:** [Detterman, Karel, Env. Health](#)  
**Subject:** RO3011: Modified Work Plan Approval for Fuel Leak Case No. RO0003011 and GeoTracker Global ID T10000001614, City of Alameda Maintenance Services, 1616 Fortmann Way, Alameda, CA 94501  
**Date:** Friday, August 02, 2013 11:50:00 AM

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Dear Mr. Barajas:

Alameda County Environmental Health Department (ACEH) staff has reviewed the case file, including the June 3, 2013 *Site Conceptual Model and Data Gap Work Plan* (Work Plan) prepared and submitted on your behalf by AMEC Environmental & Infrastructure, Inc. (AMEC). Thank you for submitting the report.

The Work Plan proposes delineation of the diesel spill by advancing 12 soil borings to a depth of five feet below grade and collection and analysis of two soil samples from each boring for total petroleum hydrocarbon (TPH) scan for diesel only by EPA Modified 8015.

ACEH has also evaluated the Work Plan with respect to the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). The Work Plan provides an opportunity to optimize data collection and efficiency of field mobilizations to ensure adequate data collection to determine if the case meets the LTCP for expedited case closure.

Based on ACEH staff review of the work plan the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed field investigation. 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 or technical comments below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org)) prior to the start of field activities.

#### **TECHNICAL COMMENTS**

- 1. Soil and Groundwater Sample Selection Protocols** – The Work Plan proposes to collect two soil samples only in each soil boring at predetermined depth intervals of two feet and five feet. ACEH requests that additional soil samples be collected and submitted for analysis at the first indication of groundwater, at significant changes in lithology, and signs of contamination (odor, discoloration, photoionization detector (PID) responses, etc.). Additionally, it is critical to determine if groundwater beneath the site was impacted by the diesel spill, so ACEH requests the collection of grab groundwater samples from an adequate number of the proposed 12 soil borings to determine the lateral extent (if any) of groundwater impact. Please provide your rationale for choosing the groundwater sample locations in the Soil and Groundwater Investigation Report requested below.
- 2. Soil and Groundwater Sample Analytical Protocols** - The soil samples were proposed to be analyzed for total petroleum hydrocarbon (TPH) scan for diesel only by EPA Modified 8015. ACEH additionally requests analysis of all soil and groundwater samples for (TPH-d) by Environmental Protection Agency (EPA) Method 8015M with silica gel cleanup. As per the LTCP, ACEH also requests analysis of all soil and groundwater samples for benzene, toluene, ethylbenzene, and xylenes (BTEX), methyl tertiary-butyl ether (MTBE), and naphthalene by EPA Method 8260B/C and polycyclic aromatic hydrocarbons (PAHs) by EPA 8270 SIM.
- 3. Determination of Groundwater Quality** – The Work Plan states that because the site is located approximately 400 feet west of the Oakland Inner Harbor, groundwater beneath the site appears to be of no beneficial use due to high total dissolved solids (TDS). However, because groundwater quality is unknown beneath the site, this is a premature assumption. Please analyze representative the grab groundwater samples for TDS to confirm your assumption.

Additionally, all groundwater in the East Bay Plain Groundwater Basin is classified as 'MUN'

(potentially suitable for municipal or domestic water supply). According to the San Francisco Regional Water Quality Control Board (SFRWQCB) Water Quality Control Plan (Basin Plan), dated January 18, 2007, for the San Francisco Bay Basin, "the term 'groundwater' includes all subsurface waters, whether or not these waters meet the classic definition of an aquifer or occurs within identified groundwater basins.' The Basin Plan also states that 'all groundwaters are considered suitable, or potentially suitable, for municipal or domestic water supply (MUN).'" Therefore, the groundwater beneath the subject site must be considered beneficial for these uses unless shown to be non-beneficial using criteria presented in the Basin Plan.

#### **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, in accordance with the specified file naming convention below, according to the following schedule:

- **October 1, 2013** – Soil and Groundwater Investigation Report  
File to be named: SWI\_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.

Thank you,

Karel Detterman, PG  
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PDF copies of case files can be downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>