

**From:** [Detterman, Karel, Env. Health](#)  
**To:** ["Carmel, Charles"; Miller, Robert \(Broadbent & Associates\); Tidwell, Kristene \(BROADBENT & ASSOC. INC\); "PDKing0000@aol.com"](#)  
**Cc:** [Roe, Dilan, Env. Health](#)  
**Subject:** FW: Fuel Leak Case R00003100; Geotracker Global IDT10000004348, Buttner Property, 1900 Webster Street, Oakland, CA 94612-2946  
**Date:** Friday, August 29, 2014 5:34:39 PM  
**Attachments:** [Attachment 1 and ftpUploadInstructions 2014-05-15.pdf](#)

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Hello Chuck, Kristene, Rob, and Paul (Please forward this e-mail to Sammy Joselewitz at Webster Equity LLC):

Thank you for participating in a meeting on July 31, 2014 with Alameda County Environmental Health (ACEH) at our office for a discussion of the site. ACEH staff has reviewed the case file in conjunction with the State Water Resources Control Board's (SWRCB) Low Threat Underground Storage Tank Case Closure Policy (LTCP). ACEH provided conditional approval on June 6, 2014 to implement the March 5, 2014 *Work Plan for Additional Groundwater Investigation and Vapor Intrusion Assessment (Work Plan)* prepared by Broadbent. However, a *Subsurface Investigation Report (Report)* dated June 11, 2014 prepared by P&D Environmental, Inc. (P&D) on behalf of the current property owner, Webster Equity LLC, was uploaded to ACEH's ftp site. P&D prepared the *Subsurface Investigation Report* because Webster Equity LLC was refinancing the property. Prior to implementation of the Work Plan, ACEH invited Paul King to the July 31<sup>st</sup> meeting to discuss the new data presented in the Report prior to implementation of the Work Plan.

Based on the discussions during our meeting, ACEH requests that you address the following Technical Comments in addition to ACEH's June 6, 2014 Technical Comments and submit the requested report by the date provided below.

### **TECHNICAL COMMENTS**

- 1. Additional Soil Boring Location** – Please add a soil boring in the vicinity of the site's 19<sup>th</sup> Street driveway or in the sidewalk across 19<sup>th</sup> Street from the driveway to address the existence of an on &/or off-site source;
- 2. LTCP's Technical Justification for Groundwater Media-Specific Criteria** – Because the site has no groundwater monitoring wells, there is a lack of trend data for Gasoline-Range Organics (GRO) and benzene in groundwater. Using LTCP's Technical Justification for Groundwater Media-Specific Criteria, please estimate the GRO and benzene plume lengths and submit the findings as an appendix of the SCM requested below.

### **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 and the following specified file naming convention and schedule:

- **October 31, 2014** – Site Conceptual Model  
File to be named: RO3100\_SCM\_R\_yyyy-mm-dd

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.

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](mailto:karel.detterman@acgov.org) or call me at (510) 567-6708.

Karel Detterman, PG  
Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
Direct: 510.567.6708  
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Email: [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org)

PDF copies of case files can be downloaded at:

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

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**From:** Detterman, Karel, Env. Health  
**Sent:** Friday, June 06, 2014 5:24 PM  
**To:** Carmel, Charles; 'Kristene Tidwell'; Rob Miller  
**Cc:** Roe, Dilan, Env. Health  
**Subject:** Fuel Leak Case RO0003100; Geotracker Global IDT10000004348, Buttner Property, 1900 Webster Street, Oakland, CA 94612-2946

Hello Chuck, Kristene, and Rob:

Thank you for participating today in a meeting with Alameda County Environmental Health (ACEH) at our office for a discussion of the March 5, 2014 *Work Plan for Additional Groundwater Investigation and Vapor Intrusion Assessment* (Work Plan) prepared by Broadbent. Thank you for submitting the Work Plan.

Based on ACEH staff review of the case file and the Work Plan, we generally concur with the proposed scope of work, provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. This may require some changes to the planned scope of work; however, inclusion of the additional scope of work is expected to expedite the case to closure. The submittal of a Work Plan Addendum is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed.

We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested 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.

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## **TECHNICAL COMMENTS**

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1. 2014 Work Plan Modifications – The referenced work plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests several modifications to the approach for the purpose of collecting specific data required to close the case under the LTCP in the minimum number of field events:
    - a. **LTCP General Criteria c (unauthorized release stopped) and f (Secondary source removed extent practicable):** Please place a second soil boring in the sidewalk to the southeast and approximately 20 – 25 feet of SB-4 as shown on Figure 3 of the Work Plan;
    - b. **LTCP General Criteria e (Site Conceptual Model):** Please prepare a site conceptual model in a tabular form including a sensitive receptor survey;
    - c. **LTCP Media Specific Criteria for Groundwater:** Please include analysis for VOCs on groundwater sample for SB-6 only and please use the criteria listed in Table 1 of the LTCP’s Technical Justification for Groundwater Media-Specific Criteria to define the length of the plume;
    - d. **LTCP Media Specific Criteria for Vapor Intrusion to Indoor Air:** Please collect soil vapor samples 5 feet below the bottom of the existing buildings foundation;
    - e. **LTCP Media Specific Criteria for Direct Contact and Outdoor Air Criteria:** Please collect samples from depths of 3 feet and 7 feet from all soil borings.

Based on the discussions during today’s meeting, please summarize the data, prepare the SCM Table, and contact us to set up a meeting to discuss the findings. At that meeting, we’ll discuss the results, any remaining data gaps, and determine the path forward.

## **TECHNICAL REPORT REQUEST**

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Please upload the technical report to the ACEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board’s Geotracker website, in accordance with Attachment 1 and the following specified file naming convention and schedule:

- **July 31, 2014** – Site Conceptual Model  
File to be named: RO3100\_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.

Thank you,

Karel Detterman, PG  
Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway