



July 25, 2016

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Piedmont, CA 94611-3603

Webster Equity LLC  
Mr. Sammy Joselewitz  
1440 Broadway, Suite 405  
Oakland, CA 94612-2024 (Sent via E-mail to: [sammy@highcomsecurityservices.com](mailto:sammy@highcomsecurityservices.com))

Subject: Technical Report Request for Fuel Leak Case No. RO0003100 and GeoTracker Global  
ID T10000004348, Buttner Property, 1900 Webster Street, Oakland, CA 94612-2946

Gentlemen:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file for the above-referenced site including the May 24, 2016 *Conceptual Site Model, Sensitive Receptor Survey, and Case Closure Request* (CSM-RFC) prepared by Broadbent and Associates (Broadbent). Thank you for submitting the RFC. With limited additional data, it is ACDEH's opinion that the case will be eligible for closure. Please address the following technical comments and submit a CSM-RFC Addendum to address the technical comments by the date provided below. Additionally, please include an updated Table 1, *Conceptual Site Model* with the CSM-RFC Addendum.

### **Technical Comments**

1. **LTCP Media Specific Criteria for Groundwater** – Our review of the case files indicates that insufficient data and analysis has been presented to support the requisite characteristics of the plume length. According to the LTCP, a plume is considered stable or decreasing if a contaminant mass has expanded to its maximum extent. Please include the following lines of evidence in the CSM-RFC Addendum:
  - a. Table 1, *Conceptual Site Model* provided an estimated groundwater flow direction to the north-northeast at the site due of the lack of site groundwater monitoring wells. Please plot recent groundwater gradient directions of the adjacent sites on a figure and list the adjacent site addresses in a table.
  - b. Total petroleum hydrocarbons as gasoline (TPHg) was detected at 59,000 micrograms per liter (ug/L) in a 2011 grab groundwater sample SB-3 indicating the possible presence of free product as discussed in the Technical Justification for Vapor Intrusion (VI) Media Specific Criteria of the LTCP. Laboratory footnotes for SB-3 indicated the presence of sheen/free product in the sample. A grab groundwater sample SB-6 detected 11,000 ug/L TPHg during the 2015 investigation. Please revise Drawing 3, Gasoline-Range Organics (GRO) Isoconcentration Contour Map to indicate estimated GRO concentrations off-site in the groundwater downgradient direction shown in Technical Comment 1a.
  - c. By referencing Table 1: *Plume Characteristics*, in the LTCP's *Technical Justification for Groundwater Media-Specific Criteria*, please plot on a new figure the average, 90<sup>th</sup> percentile, and

maximum plume lengths for TPHg, benzene, and MTBE as shown in the Attachment 2, Figures 10, 11, and 12.

- d. Please identify on a site vicinity figure buildings with basements, half-basements, or potential dewatering structures (such as sump pumps) as shown in the Attachment 2, Figure 2.
2. **LTCP Media Specific Criteria for Vapor Intrusion to Indoor Air** – It is stated in the RFC's Section 3.3, *Media Specific Criteria – Petroleum Vapor Intrusion to Indoor Air* that a bioattenuation zone of soil not impacted by hydrocarbons greater than five feet in length [sic] depth exists at the Site. However, GRO soil gas concentrations in both of the shallow soil gas samples SG-1A and SG-2A taken at a depth of 3.0 to 3.5 feet below ground surface (bgs) were greater than those of the deeper soil gas samples SG-1B and SG-2B taken at a depth of 5.25 to 5.75 bgs. Soil Gas sample SG-1A detected 22,000 micrograms per cubic meter ( $\text{ug}/\text{m}^3$ ) GRO, SG-2A detected 6,900  $\text{ug}/\text{m}^3$  GRO, SG-1B detected 9,500  $\text{ug}/\text{m}^3$  GRO, and SG-2B detected 4,200  $\text{ug}/\text{m}^3$  GRO. This appears to indicate a bioattenuation zone five feet in depth at the site is impacted by petroleum hydrocarbons. In the CSM-RFC Addendum, please describe possible mechanisms to explain the apparent reverse concentration gradient observed in SG-1A, SG-1B, SG-2A, and SG-2B and revise Table 1, CSM.

### **Technical Report Request**

- **August 25, 2016** – CFM-RFC Addendum  
File to be named: RO3100\_ADEND\_RFC\_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. 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  
Attachment 2 – Sample Figure 2, Adjacent Buildings with Basements and Figures 10, 11, 12 LTCP Plume Lengths

cc: Jason Duda, Broadbent & Associates, 1370 Ridgewood Dr., Suite 5, Chico, CA 95973 (Sent via e-mail to: [jduda@broadbentinc.com](mailto:jduda@broadbentinc.com))  
Matt Herrick, Broadbent & Associates, (Sent via e-mail to: [mherrick@broadbentinc.com](mailto:mherrick@broadbentinc.com))  
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))  
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.

# ATTACHMENT 2

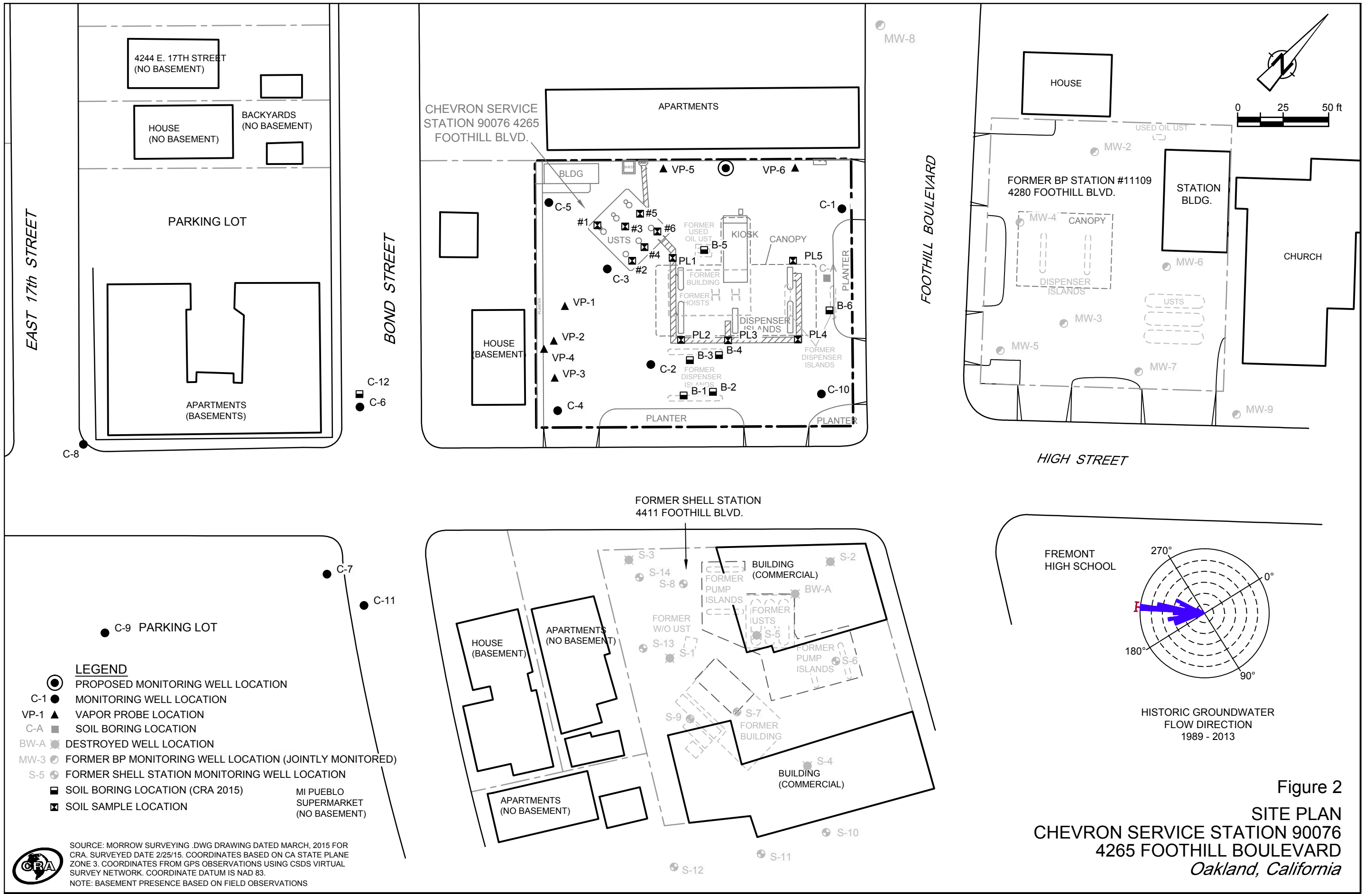
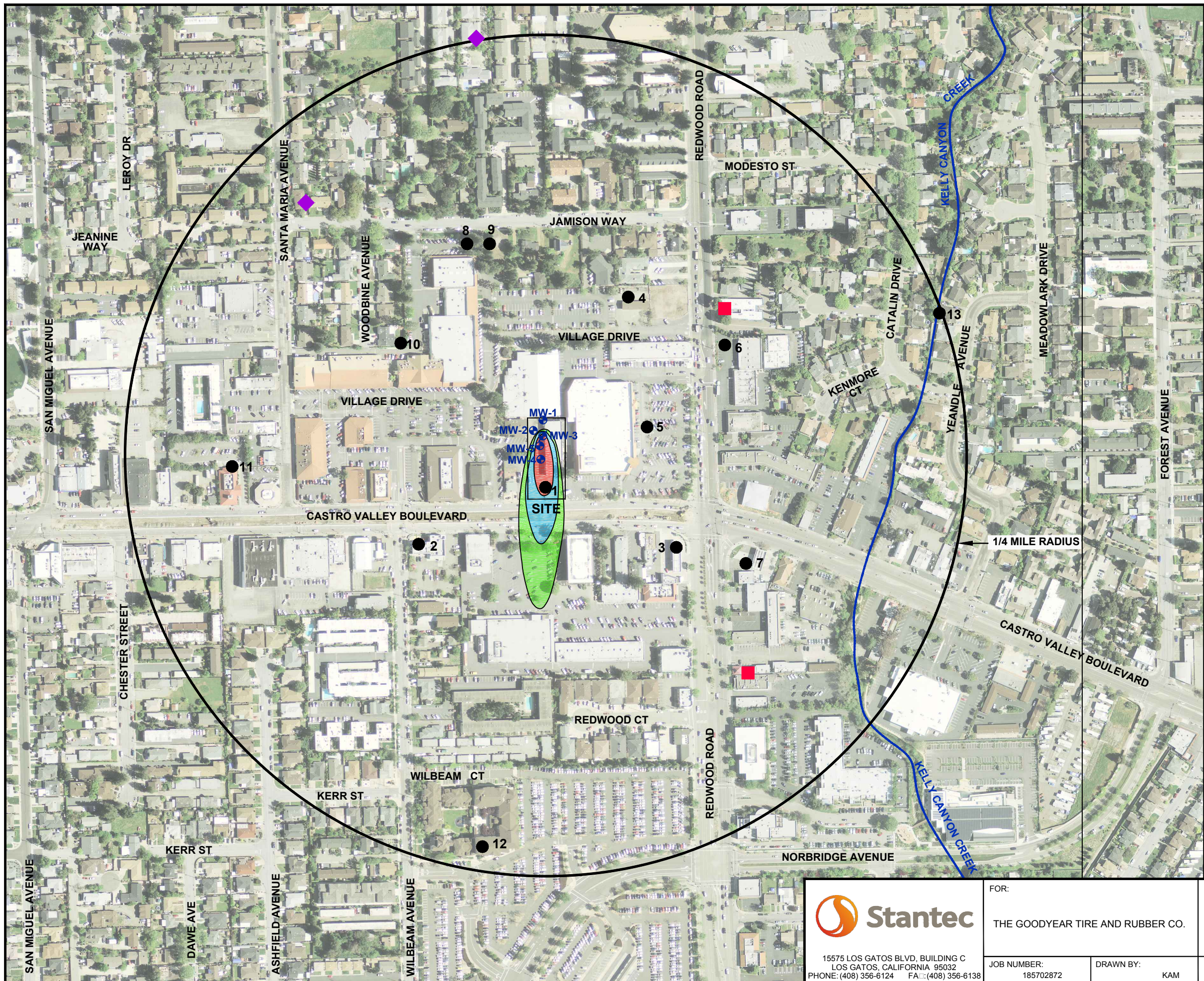


Figure 2  
 SITE PLAN  
 CHEVRON SERVICE STATION 90076  
 4265 FOOTHILL BOULEVARD  
 Oakland, California

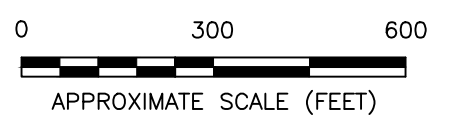



SOURCE: MORROW SURVEYING .DWG DRAWING DATED MARCH, 2015 FOR CRA. SURVEYED DATE 2/25/15. COORDINATES BASED ON CA STATE PLANE ZONE 3. COORDINATES FROM GPS OBSERVATIONS USING CSDS VIRTUAL SURVEY NETWORK. COORDINATE DATUM IS NAD 83.  
 NOTE: BASEMENT PRESENCE BASED ON FIELD OBSERVATIONS



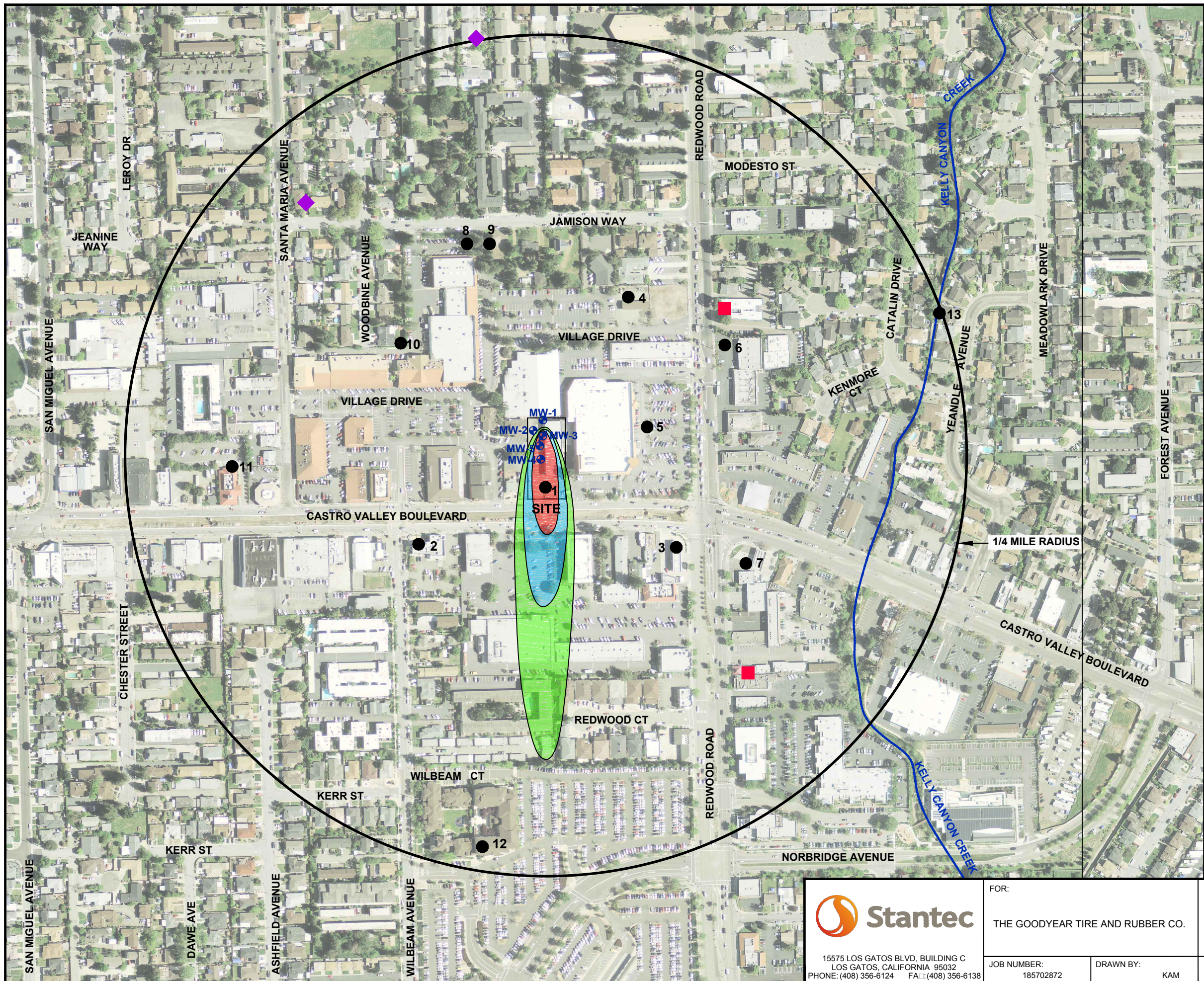


- LEGEND:**
- PROPERTIES WITH WELLS WITHIN 1/4-MILE OF SITE
  - MEDICAL OFFICES WITHIN 1/4-MILE OF SITE
  - ◆ SCHOOLS WITHIN 1/4-MILE OF SITE
  - ⊕ ACTIVE GROUNDWATER MONITORING WELL LOCATION
  - ⊖ DESTROYED GROUNDWATER MONITORING WELL LOCATION
  - ▭ AVERAGE PLUME LENGTH (5 ug/L)
  - ▭ 90TH PERCENTILE PLUME LENGTH (5 ug/L)
  - ▭ MAXIMUM PLUME LENGTH (5 ug/L)

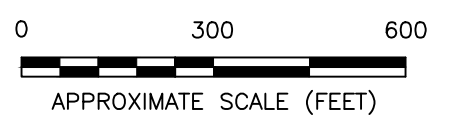


 15575 LOS GATOS BLVD, BUILDING C LOS GATOS, CALIFORNIA 95032 PHONE: (408) 356-6124    FAX: (408) 356-6138	FOR: THE GOODYEAR TIRE AND RUBBER CO.		<b>POTENTIAL BENZENE PLUME LENGTHS          BASED ON LTCP          TECHNICAL JUSTIFICATION          GOODYEAR DEX #9578          3430 CASTRO VALLEY BOULEVARD          CASTRO VALLEY, CALIFORNIA</b>		FIGURE: <b>10</b>
	JOB NUMBER: 185702872	DRAWN BY: KAM	CHECKED BY: KM	APPROVED BY: GM	DATE: 01/08/15





- LEGEND:**
- PROPERTIES WITH WELLS WITHIN 1/4-MILE OF SITE
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  - ▭ 90TH PERCENTILE PLUME LENGTH (5 ug/L)
  - ▭ MAXIMUM PLUME LENGTH (5 ug/L)



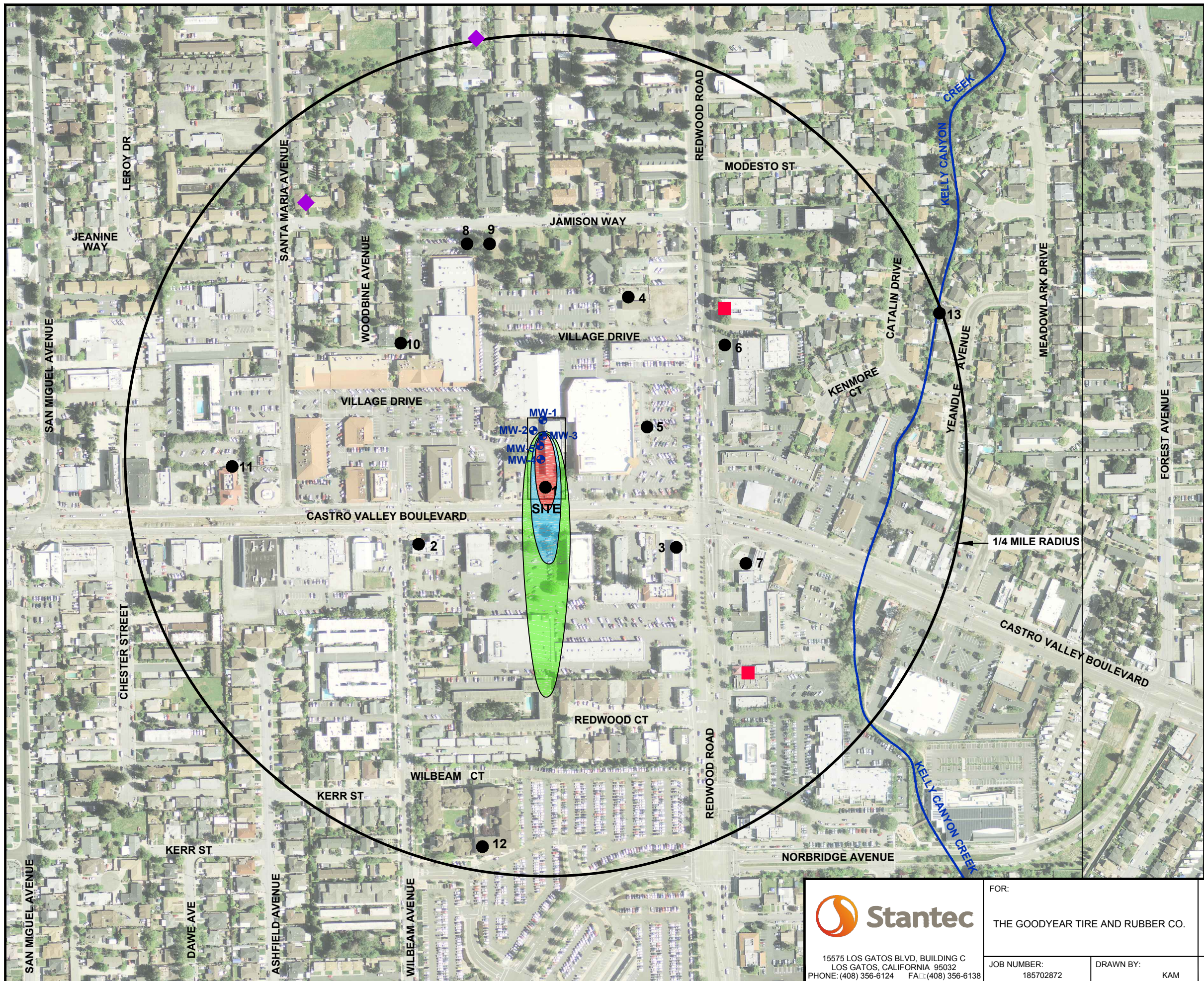
**Stantec**  
 15575 LOS GATOS BLVD, BUILDING C  
 LOS GATOS, CALIFORNIA 95032  
 PHONE: (408) 356-6124 FA: (408) 356-6138

FOR: THE GOODYEAR TIRE AND RUBBER CO.	
JOB NUMBER: 185702872	DRAWN BY: KAM

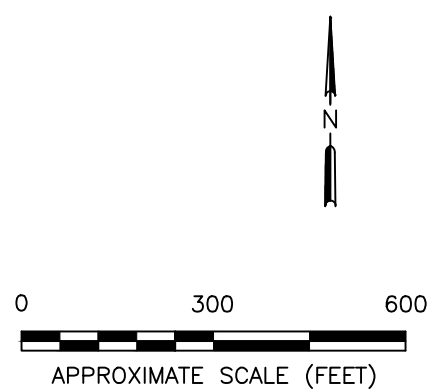
<b>POTENTIAL MTBE PLUME LENGTHS BASED ON LTCP TECHNICAL JUSTIFICATION GOODYEAR DEX #9578 3430 CASTRO VALLEY BOULEVARD CASTRO VALLEY, CALIFORNIA</b>	
CHECKED BY: KM	APPROVED BY: GM


FIGURE: <b>11</b>
DATE: 01/08/15





- LEGEND:**
- PROPERTIES WITH WELLS WITHIN 1/4-MILE OF SITE
  - MEDICAL OFFICES WITHIN 1/4-MILE OF SITE
  - ◆ SCHOOLS WITHIN 1/4-MILE OF SITE
  - ⊕ ACTIVE GROUNDWATER MONITORING WELL LOCATION
  - ⊖ DESTROYED GROUNDWATER MONITORING WELL LOCATION
  - ▭ AVERAGE PLUME LENGTH (100 ug/L)
  - ▭ 90TH PERCENTILE PLUME LENGTH (100 ug/L)
  - ▭ MAXIMUM PLUME LENGTH (100 ug/L)



 15575 LOS GATOS BLVD, BUILDING C LOS GATOS, CALIFORNIA 95032 PHONE: (408) 356-6124    FAX: (408) 356-6138	FOR: THE GOODYEAR TIRE AND RUBBER CO.		<b>POTENTIAL TPHg PLUME LENGTHS          BASED ON LTCP          TECHNICAL JUSTIFICATION          GOODYEAR DEX #9578          3430 CASTRO VALLEY BOULEVARD          CASTRO VALLEY, CALIFORNIA</b>		FIGURE: <b>12</b>
	JOB NUMBER: 185702872	DRAWN BY: KAM	CHECKED BY: KM	APPROVED BY: GM	DATE: 01/08/15