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May 23, 2014

Kyle Milligan and Susan Casentini Trust  
388 Belmont Street  
Oakland, CA 94610-4821  
(sent by e-mail to [casentini20@hotmail.com](mailto:casentini20@hotmail.com))

Subject: Work Plan Addendum Request for Fuel Leak Case No. RO0003125 and GeoTracker  
Global ID T10000005131, Milligan & Casentini Property, 385 26<sup>th</sup> Street Avenue,  
Oakland, CA 94612

Dear Ladies and Gentlemen:

Alameda County Environmental Health (ACEH) has reviewed the case files for the above referenced site including the *Data Gap Investigation Work Plan and Site Conceptual Model (WP-SCM)* dated March 25, 2014, prepared on your behalf by Cook Environmental Services, Inc. (CES). ACEH additionally had a meeting with you and CES to discuss the site and the path to closure on January 28, 2014. Thank you for submitting the WP-SCM and for attending the meeting.

According to the April 11, 2013 UST Report, during a site paving project on February 13, 2013, a twelve-foot diameter decayed 500-gallon redwood underground storage tank (UST) was discovered at the site. Under a UST removal permit from the Oakland Fire Department (OFD), approximately 80 gallons of heating oil, the remnants of the redwood UST, and contaminated soil were removed from the UST excavation on March 11, 2013. Concentrations of up to 11,000 milligrams per kilogram (mg/kg) Total Petroleum Hydrocarbons as diesel (TPHD) and 6,500 mg/kg TPH motor oil were documented in soil samples. The WP-SCM proposes the installation of six soil borings, five around the former UST location to define the lateral extent of petroleum hydrocarbon and one approximately 80 feet south of the UST location in the estimated downgradient direction to determine impact to groundwater at the downgradient property boundary.

ACEH has previously evaluated the data presented in the WP-SCM in conjunction with the case files and the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on ACEH staff review, we determined the site fails to meet the LTCP General Criteria b (Petroleum Release Only), c (Primary Release has stopped), d (Free Product removed to extent practicable), e (Site Conceptual Model), f (Secondary Source Removal) and the Media-Specific Criteria for Groundwater, the Media-Specific Criteria for Vapor Intrusion to Indoor Air, and the Media-Specific Criteria for Direct Contact and Outdoor Air Exposure. Please refer to ACEH's January 10, 2014 directive letter for details on the LTCP analysis.

We request that you address the following technical comments and send us the technical reports requested below.

## **TECHNICAL COMMENTS**

- A. Request for a Work Plan Addendum** – The WP-SCM addresses a few elements of ACEH’s January 10, 2014 directive letter; however, the WP-SCM is missing the majority of elements requested in the directive letter. This letter is an attempt to clarify those items and to request a work plan addendum in order to provide further information on those elements. These are discussed further below:
- 1. LTCP General Criteria b (Unauthorized Release Consists Only of Petroleum)** – ACEH’s review of the WP-SCM indicates that insufficient data was provided to address the data gaps detailed in ACEH’s January 2014 letter such as how the redwood UST was found in a disintegrated state or how it was determined that the redwood tank was used for the storage of heating oil because the oil itself was not analyzed to confirm its composition as heating oil. Specifically, the *Past Activities* of SCM Element, Table 2, indicates that a machine shop occupied the site for approximately 70 years, from the 1930’s to 2006. ACEH is concerned that insufficient analytical data will be collected to verify that machine shop activities did not use the redwood UST for waste oil storage or that the fill pipe extended to the former machine shop rather than to the street. Please refer to the September 2012 California SWRC’s *Leaking Underground Fuel Tank (LUFT) Guidance Manual* for recent guidelines for characterizing an unknown fuel. Please revise the soil and groundwater sample collection strategy presented in the WP-SCM to address the data gap identified above such as the need for analysis of chlorinated solvents, and wear metals that are typically associated with machine shop use and waste oil storage. Please address the data gaps identified above in a Work Plan Addendum described in Technical Comment B below.
  - 2. General Criteria c (Primary Release has stopped)** – ACEH’s review of the WP-SCM indicates that insufficient data was provided to address the data gaps identified in ACEH’s January 2014 letter including, but not limited to, presence of fluid in the piping, the disposal of the piping, or the location, diameter, and/or extent of the piping, location of fill spout, or type of native soil surrounding the UST. As requested, documentation regarding the type of material used for the tank excavation backfill was provided. Additionally, *Past Activities* of SCM Element, Table 2, indicates that a machine shop occupied the site for approximately 70 years, from the 1930’s to 2006. ACEH is concerned that insufficient analytical data will be collected to verify that machine shop activities did not use the redwood UST for waste oil storage or that the fill pipe extended to the former machine shop rather than to the street. Please address the data gaps identified above in a Work Plan Addendum described in Technical Comment B below.
  - 3. LTCP General Criteria d (Free Product)** – ACEH’s review of the WP-SCM indicates that insufficient data was provided to address the data gaps identified in ACEH’s January 2014 letter. Specifically, ACEH does not approve of hand auguring the six proposed soil borings to 20 feet below ground surface (bgs) for soil and groundwater sample collection. Hand auguring is not suitable for achieving this depth to adequately verify for free product or to ensure collection of representative soil samples. Please address the data gaps identified above in a Work Plan Addendum and include Standard Operation Procedures (SOPs) for the use of appropriate direct push technology.

4. **LTCP General Criteria e (Site Conceptual Model)** – Our review of the WP-SCM indicates that insufficient data collection and analysis has been presented to assess the nature, extent, and mobility of the release and to support compliance with General Criteria b, c, d, and f, Media Specific Criteria for Vapor Intrusion to Indoor Air, Groundwater, and Direct Contact and Outdoor Air Exposure as described in Items 1 through 8. Please address the data gaps identified above in a Work Plan Addendum described in Technical Comment B below.
5. **General Criteria f – Secondary Source Has Been Removed to the Extent Practicable** – Our review of the WP-SCM indicates that insufficient data and analysis has been presented to address the data gaps identified in ACEH's January 2014 letter. The SCM-WP included a figure indicating the location of the former UST, waste profiles, and manifests; however, details concerning the location, sampling, and removal of the UST piping, the type of native soil surrounding the UST, the decision process and analytical data used to determine the lateral and vertical extent of the excavation, the decision process and data used to determine the final excavation extents and depth, and the decision process and analytical data used to classify the soil as non-hazardous waste or non-RCRA hazardous waste was not provided. Please address the data gaps identified above in a Work Plan Addendum as described below and update Tables 2 and 3.
6. **LTCP Media Specific Criteria for Groundwater** – ACEH's review of the WP-SCM indicates the proposed soil boring locations adequately meet this Criterion but ACEH does not approve of hand auguring for soil and groundwater sample collection. Hand auguring is not suitable for achieving this depth to adequately verify for free product or to ensure collection of representative groundwater samples. Please analyze all grab groundwater samples for Total Petroleum Hydrocarbons as gasoline (TPHG), TPH as diesel (TPHD), and TPH motor oil (TPHMO) by modified EPA 8015, and volatile organic compounds (VOCs) by EPA Method 8260B, and semi-volatile organic compounds (SVOCs) by EPA Method 8270, to address the data gaps identified above. Please address the data gaps identified above in a Work Plan Addendum described below and include SOPs for the use of appropriate sampling technology in an appendix.
7. **LTCP Media Specific Criteria for Vapor Intrusion to Indoor Air** – ACEH's review of the WP-SCM indicates that insufficient data was provided to address the data gaps identified in ACEH's January 2014 letter. The stated purpose of the soil vapor borings is to determine if the site qualifies for closure under LTCP Scenario 4. Please note that use of criteria i and ii, Scenario 4 of LTCP's Media-Specific Criteria Petroleum Vapor Intrusion to Indoor Air require the definition of the site's bioattenuation (unsaturated) zone. Additionally, for an existing building, the soil gas measurements must be taken at least 5 feet below the bottom of the building foundation.

Please note, that if direct measurement of soil gas is proposed to determine if the site qualifies for closure under LTCP Scenario 4, ensure that your strategy is consistent with the field sampling protocols described in the Department of Toxic Substances Control's Final Vapor Intrusion Guidance (October 2011). Consistent with the guidance, ACEH requires installation of permanent vapor wells to assess temporal and seasonal variations in soil gas concentrations.

Please revise the soil vapor sample collection strategy presented in the WP-SCM as described in Technical Comment B below to address the data gap identified above. Please

include SOPs for the proposed soil vapor sampling and analytical methodology including use of direct push technology for soil vapor point installation in an appendix to the Work Plan Addendum.

- 8. LTCP Media Specific Criteria for Direct Contact and Outdoor Air Criteria** – ACEH's review of the WP-SCM indicates that insufficient data was provided to address the data gaps identified in our January 2014 letter. Specifically, the work plan proposes the collection of soil samples at 8, 12, 16, and 20 feet bgs which do not satisfy this criterion. Soil samples must be collected from each of the six borings at the 0 to 5 and 5 to 10-foot intervals, at the groundwater interface, lithologic changes, and at areas of obvious impact. In each boring location, please analyze soil samples collected from the 0 to 5 feet and 5 to 10 feet bgs for TPHG, TPHD, and TPHMO by modified EPA 8015, VOCs including naphthalene by EPA Method 8260B, and SVOCs including polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8270 to address the data gaps identified above.

Please ensure soil samples are collected in the 0 to 5 and 5 to 10-foot intervals in each boring to define the bioattenuation (unsaturated) zone. Please address the data gaps identified above in a Work Plan Addendum described in Technical Comment B below and include SOPs for the proposed groundwater sampling methodology in an appendix to the Work Plan Addendum.

- B. Data Gap Investigation Work Plan Addendum and Site Conceptual Model** – Please prepare Data Gap Investigation Work Plan Addendum and SCM to address the technical comments listed above and below. Please submit the Work Plan Addendum and SCM by the date referenced below. Note that all data gaps mentioned previously must specifically be addressed in the WP-SCM Addendum and the SCM must be updated with the new information.

Thank you for utilizing ACEH's suggested SCM in tabular form. The following are comments regarding Table 2, Table 3, and the Figures of the WP-SCM:

1. It was noted that only one data base was used for the *Surface Water Bodies and Nearby Wells Elements* of Table 2, and consequently important data may be missing. Please refer to the *Preferential Pathway and Sensitive Receptor Study of Attachment A, Site Conceptual Model Requisite Elements* to address this data gap in the Work Plan Addendum. Please use Alameda County Public Works Agency (ACPWA) in addition to DWR resources as these two databases are sufficiently different to warrant a review of both.
2. Please ensure that all data gap item numbers are accounted for between Table 2 and Table 3 as Data Gap Item 4 is referenced in Table 3 but not in Table 2.
3. As indicated in Attachment A *Site Conceptual Model Requisite Elements*, please include a site map showing the location of the former UST, the locations of all soil samples taken during the UST removal, the extent of the excavation, the fill pipe, all UST system appurtenances, and potential source areas associated with historic site use as a machine shop by the date specified below. Please include in all future reports an extended site map using an aerial photographic base map to depict both the site and immediate vicinity to facilitate understanding the site and surrounding vicinity.

**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 by the following schedule and file-naming convention:

- July 25, 2014 – Data Gap Investigation Work Plan Addendum and Site Conceptual Model  
File to be named: RO3125\_WP\_ADEND\_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/lop/ust.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 A –Site Conceptual Model Requisite Elements

Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations  
ACEH Electronic Report Upload (ftp) Instructions

cc: Tim Cook, Cook Environmental (Sent via e-mail to: [tcook@cookenvironmental.com](mailto:tcook@cookenvironmental.com))  
Leroy Griffin (Sent via e-mail to: [lgriffin@oaklandnet.com](mailto:lgriffin@oaklandnet.com))  
Dilan Roe, ACEH (Sent via E-mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))  
Karel Detterman, ACEH (Sent via E-mail to: [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org))  
GeoTracker, Electronic Case File

# ATTACHMENT A

## Site Conceptual Model Requisite Elements

The site conceptual model (SCM) is an essential decision-making and communication tool for all interested parties during the site characterization, remediation planning and implementation, and closure process. A SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely magnitude of potential impacts to receptors.

The SCM is initially used to characterize the site and identify data gaps. As the investigation proceeds and the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened until it is said to be "validated". At this point, the focus of the SCM shifts from site characterization towards remedial technology evaluation and selection, and later remedy optimization, and forms the foundation for developing the most cost-effective corrective action plan to protect existing and potential receptors.

For ease of review, Alameda County Environmental Health (ACEH) requests utilization of tabular formats to (1) highlight the major SCM elements and their associated data gaps which need to be addressed to progress the site to case closure (see Table 4-1 of attached example), and (2) highlight the identified data gaps and proposed investigation activities (see Table 5-1 of the attached example). ACEH requests that the tables presenting the SCM elements, data gaps, and proposed investigation activities be updated as appropriate at each stage of the project and submitted with work plans, feasibility studies, corrective action plans, and requests for closures to support proposed work, conclusions, and/or recommendations.

The SCM should incorporate, but is not limited to, the topics listed below. Please support the SCM with the use of large-scaled maps and graphics, tables, and conceptual diagrams to illustrate key points. Please include an extended site map(s) utilizing an aerial photographic base map with sufficient resolution to show the facility, delineation of streets and property boundaries within the adjacent neighborhood, downgradient irrigation wells, and proposed locations of transects, monitoring wells, and soil vapor probes.

- a. Regional and local (on-site and off-site) geology and hydrogeology. Include a discussion of the surface geology (e.g., soil types, soil parameters, outcrops, faulting), subsurface geology (e.g., stratigraphy, continuity, and connectivity), and hydrogeology (e.g., water-bearing zones, hydrologic parameters, impermeable strata). Please include a structural contour map (top of unit) and isopach map for the aquitard that is presumed to separate your release from the deeper aquifer(s), cross sections, soil boring and monitoring well logs and locations, and copies of regional geologic maps.
- b. Analysis of the hydraulic flow system in the vicinity of the site. Include rose diagrams for depicting groundwater gradients. The rose diagram shall be plotted on groundwater elevation contour maps and updated in all future reports submitted for your site. Please address changes due to seasonal precipitation and groundwater pumping, and evaluate the potential interconnection between shallow and deep aquifers. Please include an analysis of vertical hydraulic gradients, and effects of pumping rates on hydraulic head from nearby water supply wells, if appropriate. Include hydraulic head in the different water bearing zones and hydrographs of all monitoring wells.
- c. Release history, including potential source(s) of releases, potential contaminants of concern (COC) associated with each potential release, confirmed source locations, confirmed release locations, and existing delineation of release areas. Address primary leak source(s) (e.g., a tank, sump, pipeline, etc.) and secondary sources (e.g., high-

## Site Conceptual Model Requisite Elements (continued)

concentration contaminants in low-permeability lithologic soil units that sustain groundwater or vapor plumes). Include local and regional plan view maps that illustrate the location of sources (former facilities, piping, tanks, etc.).

- d. Plume (soil gas and groundwater) development and dynamics including aging of source(s), phase distribution (NAPL, dissolved, vapor, residual), diving plumes, attenuation mechanisms, migration routes, preferential pathways (geologic and anthropogenic), magnitude of chemicals of concern and spatial and temporal changes in concentrations, and contaminant fate and transport. Please refer to the *Preferential Pathway and Sensitive Preceptor Study* description on the next page. Please include three-dimensional plume maps for groundwater and two-dimensional soil vapor plume plan view maps to provide an accurate depiction of the contaminant distribution of each COC.
- e. Summary tables of chemical concentrations in different media (i.e., soil, groundwater, and soil vapor). Please include applicable environmental screening levels on all tables. Include graphs of contaminant concentrations versus time.
- f. Current and historic facility structures (e.g., buildings, drain systems, sewer systems, underground utilities, etc.) and physical features including topographical features (e.g., hills, gradients, surface vegetation, or pavement) and surface water features (e.g. routes of drainage ditches, links to water bodies). Please include current and historic site maps.
- g. Current and historic site operations/processes (e.g., parts cleaning, chemical storage areas, manufacturing, etc.).
- h. Other contaminant release sites in the vicinity of the site. Hydrogeologic and contaminant data from those sites may prove helpful in testing certain hypotheses for the SCM. Include a summary of work and technical findings from nearby release sites, including the two adjacent closed LUFT sites, (i.e., Montgomery Ward site and the Quest Laboratory site).
- i. Land uses and exposure scenarios on the facility and adjacent properties. Include beneficial resources (e.g., groundwater classification, wetlands, natural resources, etc.), resource use locations (e.g., water supply wells, surface water intakes), subpopulation types and locations (e.g., schools, hospitals, day care centers, etc.), exposure scenarios (e.g. residential, industrial, recreational, farming), and exposure pathways, and potential threat to sensitive receptors. Include an analysis of the contaminant volatilization from the subsurface to indoor/outdoor air exposure route (i.e., vapor pathway). Please include copies of Sanborn maps and aerial photographs, as appropriate. Please refer to the *Preferential Pathway and Sensitive Preceptor Study* description on the next page.
- j. Identification and listing of specific data gaps that require further investigation during subsequent phases of work. Proposed activities to investigate and fill data gaps identified.



## Preferential Pathway and Sensitive Receptor Study

Please conduct a study as a part of the SCM requested in order to (1) locate potential anthropogenic migration pathways on and in the vicinity of the site that could spread contamination through vertical and lateral migration, and (2) identify exposure scenarios and sensitive receptors that are linked to site contamination through these preferential pathways. The results of your study shall contain all information required by California Code of Regulations, Title 23, Division 3, Chapter 16, §2654(b) including but not limited to the following components, as applicable to the site:

- a. **Utility Survey** - An evaluation of all existing subsurface utility lines, laterals, and trenches including sewers, electrical, fiber optic cable, cable, water, storm drains, trench backfill, etc. within and near the site and plume area(s). Please include an evaluation of shallow utilities associated with current and historical site operations/processes including UST systems, remediation systems, parts cleaning, sumps, etc.
- b. **Updated Well Survey** – ACEH requests that well data sources (Alameda County Public Works Agency [ACPWA] and Department of Water Resources [DWR]) be reviewed for more recently installed vicinity water supply wells. ACEH requests the identification of all active, inactive, standby, decommissioned (sealed with concrete), unrecorded, and abandoned (improperly decommissioned or lost) wells including monitoring, remediation, irrigation, water supply, industrial, livestock, dewatering, and cathodic protection wells within a ¼-mile radius of the subject site. Please inspect all available Well Completion Reports filed with the DWR and ACPWA in your survey, and perform a background study of the historical land uses of the site and properties in the vicinity of the site. Use the results of your background study to determine the existence of unrecorded/unknown (abandoned) wells, which can act as contaminant migration pathways at or from your site.
- c. **Land Uses and Exposure Scenarios on the Facility and Adjacent Properties** – The surrounding land use appears to be predominately agricultural; however, redevelopment of the site as a service station has been planned. Consequently, the identification of existing and future land use on and in the vicinity of the site is requested, including:
  - o Beneficial resources (e.g., groundwater classification, wetlands, surface water bodies, natural resources, etc.)
  - o Subpopulation types and locations (e.g., schools, hospitals, day care centers, elder care facilities, etc.)
  - o Exposure scenarios (e.g. residential, industrial, recreational, farming) and exposure pathways including those identified in the Low Threat Underground Storage Tank Case Closure Policy General Criteria h – Nuisance Conditions, and Media-Specific Criteria for Groundwater, Vapor Intrusion to Indoor Air, and Direct Contact and Outdoor Air Exposure
- d. **Planned Development** – Future development activities are planned in the vicinity of the site. Please include an analysis of new utility corridors, building foundations, wells, and/or development activities that could significantly alter contaminant migration (i.e., covering of large areas of the site with pavement, etc.).

Please synthesize this information and discuss your analysis and interpretation of the results of the preferential pathway and sensitive receptor study and incorporate into the requested SCM. Please provide the following supporting documentation and data as applicable:

- Copies of current and historical maps, such as site maps, Sanborn maps, aerial photographs, etc., used when conducting the background study.
- DWR well logs, marked as confidential, uploaded to Alameda County Environmental Health's ftp site. For confidentiality purposes do not upload the DWR well logs to Geotracker. The well logs will be placed in our confidential file and will be available only to internal staff for review.
- Table with details of the well search findings including Map ID corresponding to well location on map, State Well ID, Well Owner ID, approximate distance from the site, direction from the site, use, installation date, depth (feet below ground surface [bgs]), screened interval (feet bgs), sealed interval (feet bgs), diameter (inches), and well location address.
- Maps and geologic cross-sections illustrating historical groundwater elevations and flow directions (rose diagram) at the site. Synthesize the data requested above and include the location and depth of all utility lines, trenches, UST pits and piping trenches, wells, surface water bodies, foundational elements, surface covering types (pavement, landscaped, etc.) within and near the site and plume area(s), and the location of potential receptors.

**Table 4-1  
Site Conceptual Model**

<b>CSM Element</b>	<b>CSM Sub-Element</b>	<b>Description</b>	<b>Data Gap Item #</b>	<b>Resolution</b>
Geology and Hydrogeology	Regional	<p>As described by URS (2004), the lithology encountered in the subsurface beneath the Site during drilling activities consisted predominantly of a brown to greenish-gray silty clay with sand and gravel. The primary stratigraphic units at the Site are listed below, with the approximate ranges of depth (bgs) each unit was encountered across the Site:</p> <ul style="list-style-type: none"> <li>• 0 to 5 feet bgs: The surface soil typically consisted of very dark-brown clay to dark-gray gravel fill, depending on whether the boring was in the vacant vegetated parcel (dark-brown clay), at 3860 MLK Jr. Way; or beneath the asphalt and concrete surfaces at the Lucky's Auto Body parcel at 3884 MLK Jr. Way (gravel fill).</li> <li>• 5 to 20 feet bgs: very dark-brown silty clay grades to a greenish-gray silty clay and brown silty clay and gravelly clay.</li> </ul> <p>Groundwater was encountered in direct-push boreholes at an average depth of 17.2 feet bgs, with depths ranging from 16.2 to 19.6 feet bgs. This groundwater depth is not considered a stabilized groundwater depth, because it was not measured from appropriately constructed monitoring wells.</p>	None	NA

**Table 4-1  
Site Conceptual Model (Continued)**

<b>CSM Element</b>	<b>CSM Sub-Element</b>	<b>Description</b>	<b>Data Gap Item #</b>	<b>Resolution</b>
Geology and Hydrogeology	Site	Regional groundwater in the Oakland area generally follows topography, from areas of higher elevation in the east toward lower elevation in the west and southwest. The groundwater flow direction in the vicinity of the Site is to the west towards San Francisco Bay (Arcadis, 2012).  URS reviewed groundwater investigation reports from the ARCO #4931 station at 731 West MacArthur Boulevard, approximately 1,000 feet southwest of the Site (Arcadis, 2012). The depth to water in the groundwater monitoring wells at the ARCO site ranged from approximately 3.2 to 10.8 feet bgs (approximately 52.2 to 43 feet elevation).	1. There are no monitoring wells on site so that the local groundwater flow direction and gradient is not known.	Five groundwater wells are to be installed at the site.
Surface Water Bodies		The closest surface water body is the San Francisco Bay, which is 1.5 miles west of the site.		
Nearby Wells		The State Water Resource Quality Control Board (RWQCB) Geotracker GAMA website provides the locations of water supply wells proximal to the site. The nearest supply well is located approximately 2 miles southwest of the site. There are multiple monitoring wells in the vicinity of the site including those at the Arco services station at 781 West MacArthur Blvd., and Dollar Cleaners, 4860 – 4868 Telegraph Avenue, Oakland.	2.	NA
Release Source and Volume		The three prior gasoline USTs (two 650-gallon and one 500-gallon) are considered the main source of the release of fuel hydrocarbons that have been detected in soil and groundwater beneath the Site. Tanks #1 and #2 were both observed to have one or more holes from corrosion at the time of removal. Although no holes were observed in Tank #3 during removal, the integrity of the tank was questionable as it split into two pieces along the weld during removal. Soil surrounding the tanks was stained green and was noted to have strong petroleum hydrocarbon odors. The release from the Tanks at the Site was discovered on January 5, 1995 during tank removal activities. The volume of the release is not known.	5. & 6. Additional soil and groundwater data is required in the source areas.	See data gaps table. Additional soil borings will be advanced in the source areas. Groundwater monitoring wells will be installed.

**Table 4-1  
Site Conceptual Model (Continued)**

<b>CSM Element</b>	<b>CSM Sub-Element</b>	<b>Description</b>	<b>Data Gap Item #</b>	<b>Resolution</b>
		The area around the ramps and pit in the southern area of the site is considered a potential source area.		
LNAPL		There are currently no groundwater monitoring wells located at the Site. Although light non-aqueous phase liquids were not observed during grab groundwater sampling activities, concentrations of TPH-g in sample G2 (22,000 µg/L), located near former Tank #3, and sample GP3 (79,800 µg/L), located adjacent to former Tank #1 may indicate the potential for the presence of light non-aqueous phase liquid (LNAPL) to be present.	1. Need monitoring wells at the site.	Monitoring wells (5) to be installed.
Source Removal Activities		Soil that was excavated from the UST pits during tank removal activities was returned to the excavation after the collection of soil samples for chemical analysis. There is no information regarding the quality of the soil that was placed back in the UST excavations. As such, with the exception of the removal of the USTs themselves, there have been no other source removal activities conducted at the Site.	2., 5.,6. Soil contamination at depth (12-foot bgs and deeper) is not well characterized. Since the site is to be excavated to approximately 12 feet bgs for the construction of a parking garage, additional shallow soil sampling is not required.	Ten soil borings are proposed, as discussed in the data gaps table.
Contaminants of Concern		Based on the historical investigations conducted at the Site, BTEX, cis-1,2-dichloroethene (cis-1,2-DCE), 1,2-dichloroethane (1,2-DCA) and TPH-g are present in groundwater above their respective MCLs and/or ESLs. However, based on correspondence from the ACEHSD, the contaminants of concern (COCs) for the site are BTEX, and TPH-g. These COCs are present above the screening levels primarily in the northern corner of the Site, near the location of the former USTs. Benzene and TPH-g are also present in groundwater above their MCLs and ESLs in the southern portion of the Site in the vicinity of the truck ramp and pit adjacent to the	4.	

**Table 4-1  
Site Conceptual Model (Continued)**

<b>CSM Element</b>	<b>CSM Sub-Element</b>	<b>Description</b>	<b>Data Gap Item #</b>	<b>Resolution</b>
		former shop building, and in the northwestern area of the Site.		
Petroleum Hydrocarbons in Soil		<p>Of the 58 samples analyzed from the two investigations, eight samples from seven borings exceeded their respective screening criteria. These samples were typically the deepest sample from the boring, ranging from 8.0 to 14.0 feet bgs. This is consistent with releases from a UST as opposed to a surface spill or release. Based on the historical investigation data, BTEX and TPH-g are the contaminants present in soil at concentrations exceeding their respective screening criteria. The contaminants are present mainly in soil at the location of former Tanks #1 through #3, and to a lesser extent, near the former fuel pump island in the northern corner of the Site.</p> <p>The lateral extent of contamination exceeding the screening criteria appears to be limited to the area around the former USTs. Soil concentration in all the samples from boring GP3 and S10, located in the sidewalk by Martin Luther King Jr. Way near former Tank #1 and Tank #2 are below their respective screening criteria. There is no additional data from around former Tank #3. Given the nature of the petroleum hydrocarbon (mainly light fraction gasoline), the vertical extent of contamination beneath and in close proximity to the former tanks is likely limited to the lowest level of groundwater fluctuation.</p>	4. & 7. Additional soil sampling is required to better define the vertical extent of contamination. Redevelopment will include excavation of the entire site to a depth of 12 feet bgs for the construction of an underground parking garage.	Additional soil borings to be advanced, as described in the data gaps table.
Petroleum Hydrocarbons in Groundwater		<p>During the two subsurface investigations conducted at the Site, a total of 15 grab groundwater samples were collected and analyzed for TPH-g and BTEX. The results of the analyses are summarized in Table 2-2. Concentration of TPH-g and/or BTEX exceeded their respective screening criteria in ten of the 15 samples analyzed. Similar to the soil sampling results, the highest concentrations were detected beneath or in close proximity to the former USTs. However, TPH-g and benzene were detected in one Site boring (G7) exceeding their respective screening criteria near the southern corner of the Site. There are no permanent monitoring wells located at the Site. As such, the groundwater flow direction across</p>	8. There are no monitoring wells on site.	Five monitoring wells will be installed, as described in the data gaps table and in the work plan.

**Table 4-1  
Site Conceptual Model (Continued)**

CSM Element	CSM Sub-Element	Description	Data Gap Item #	Resolution
		<p>the Site cannot be evaluated. This has been defined as a significant data gap. The scope of work presented in this work plan includes the installation of four groundwater monitoring wells at the Site.</p>		
Risk Evaluation		<p>The Site is a former auto body and car wash facility. The Site is currently vacant, and with the exception of a billboard located in the northwest corner of the Site, has no structures and is covered with either asphalt or concrete foundations from former buildings located at the Site. The Site is zoned for residential and current plans are to redevelop the Site for residential use. However, there may be some commercial use on the ground level. This preliminary CSM assumes that development would consist of an underground parking garage; store fronts and residential units at ground level; and second story residential units.</p> <p>The CSM identifies the primary source; impacted media; release mechanism(s); secondary source(s); exposure route; potential receptors (residential, commercial/industrial worker, and construction worker), and an assessment of whether the exposure route/pathway is potentially complete, incomplete, or insignificant. Potential exposure routes that have been evaluated include incidental ingestion, dermal contact, dust inhalation, and vapor inhalation.</p> <p>For direct contact with contaminated soil, the exposure route for incidental ingestion, dermal contact, and dust inhalation for a residential and commercial/industrial worker are considered incomplete. These exposure routes for the construction worker are considered a potentially complete pathway, depending on the nature of the work. For volatilization from soil to outdoor air, vapor inhalation is the potential exposure pathway. Given dilution effects that take place outdoors, this exposure pathway is considered incomplete for all three potential receptors. For indoor air, this exposure pathway is considered potentially complete for all three potential receptors.</p>		

**Table 4-1  
Site Conceptual Model (Continued)**

CSM Element	CSM Sub-Element	Description	Data Gap Item #	Resolution
		<p>For leaching of contaminants from soil to groundwater, the ingestion and dermal pathways for groundwater are considered incomplete, except for the construction worker, as shallow groundwater is not utilized as a drinking water source at the Site. For the construction worker, incidental ingestion and dermal contact is a potentially complete pathway. For volatilization from groundwater to outdoor air, the exposure pathway is considered insignificant due to dilution effects that take place outdoors. For indoor air, volatilization from groundwater to indoor air is considered a potentially complete pathway.</p>		





**Table 5-1  
Data Gaps Summary and Proposed Investigation (Continued)**

Item	Data Gap Item #	Proposed Investigation	Rationale	Analyses
2	<p>The soil data set does not adequately characterize the contamination (if any) that may remain on site after the excavation to approximately 11 to 12 feet bgs for the underground parking structure. The current soil data sets are 7 and 9 years old and may not be representative of current site conditions. Lithology below is not adequately characterized.</p>	<p>Ten soil borings will be drilled to a total depth of 20 feet bgs. Soil samples will be collected at 12 feet, 15 feet, and 20 feet bgs from soil borings SB-4 through SB-10. Soil samples will not be collected from soil borings SB-1, SB-2, and SB-3 which are located across MLK north of the site, as there is no reason to suspect an off-site soil contamination source in this area. Borings will be logged using the Unified Soil Classification System. Grab groundwater samples will be collected from the first encountered groundwater at each soil boring.</p>	<p>Soil samples will be collected starting at 12 feet bgs. Shallow soil on site is to be excavated for disposal during the construction of the underground parking garage. Excavation will be conducted to a depth of about 12 feet bgs. Soil borings will be located as shown in the work plan figure: Source area borings: At the former locations of USTs 1, 2 and 3. One boring north of the site on the side walk of MLK Way. One boring between USTs 1 and 2 and the pump island (potential leakage from conveyance piping). One boring at the approximate location of UST 3 (in addition to the soil samples to be collected from the monitoring well to be installed at this location). One boring in the vicinity of the ramps and pit in the southern portion of the site (in addition to soil samples to be collected from the monitoring well in this area). Step out borings: Step out boring SB-5 to be completed proximal to the UST #3 source area. GP4 Area: Benzene was previously detected at 25,000 µg/kg at location GP4 (Carver, 2006). Two step-out borings will be completed in this area to further characterize soils at depth.</p>	<p>TPH-g, BTEX, EDB, EDC.</p> <p>Boring SB-4 (on sidewalk of MLK near UST 1): PAHs</p>

**Table 5-1  
Data Gaps Summary and Proposed Investigation (Continued)**

<b>Item</b>	<b>Data Gap Item #</b>	<b>Proposed Investigation</b>	<b>Rationale</b>	<b>Analyses</b>
3	There is no data on the presence and usage of wells in the vicinity of the site.	Obtain a well survey.	Identify irrigation and other wells in the site vicinity.	N/A
4	PAHs are potential COCs at the northern boundary of the site.	See soil borings – Item 2. PAHs will be analyzed at select locations as described in Item 2.	Item 2	Item 2
5	There is a potential source area in the vicinity of the ramps and pit.	A monitoring well will be installed in this area. It will also serve as the upgradient well for the site. See Item 2. A soil boring will also be completed in this area.	Item 2	Item 2
6	Determine size and contents of the three USTs that were removed from the site	Review prior reports.	Tanks #1 and #2 were identified as 650-gallon gasoline tanks. Tank #3 was a 500-gallon gasoline tank [Tank Removal Report – 1995]. Tanks #2 and #3 were observed to be badly deteriorated with holes due to corrosion.	NA
7	Confirm whether TPH-g and BTEX were detected during construction of the adjacent residential unit	Review prior reports.	The URS site investigation conducted in 2004 found no detections of TPH-g [ $<1,000 \mu\text{g}/\text{kg}$ ] or BTEX [ $<5.0 \mu\text{g}/\text{kg}$ ] in the borings completed to 14 feet bgs.	NA

**Table 5-1  
Data Gaps Summary and Proposed Investigation (Continued)**

<b>Item</b>	<b>Data Gap Item #</b>	<b>Proposed Investigation</b>	<b>Rationale</b>	<b>Analyses</b>
8	Review data from the nearby service stations (Arco)	Review prior reports.	The former Arco station (731 West MacArthur Blvd.) is about 0.5 miles crossgradient of the 3884 MLK site. The BTEX levels are lower than those at the subject site; the Arco site does not appear to be contributing to on site TPH or BTEX contamination. Groundwater elevation data from this site was used to calculate groundwater flow direction, since there are currently no wells at the 3884 MLK site.	NA

## 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.