From:	Detterman, Karel, Env. Health
To:	"Leonard M Silvani"
Cc:	Roe, Dilan, Env. Health; "Paul Dotson"
Subject:	FW: Fuel Leak Case RO 3126 - GeoTracker Global ID T10000005132 California Glass Company 155 98th Ave. Oakland 94603
Date:	Thursday, July 24, 2014 1:55:22 PM
Attachments:	Attachment Rev Preferential Pathway and Sensitive Receptor Study.pdf

The attachment is included.

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

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

From: Detterman, Karel, Env. Health
Sent: Thursday, July 24, 2014 1:53 PM
To: 'Leonard M Silvani'
Cc: Roe, Dilan, Env. Health; 'Paul Dotson'
Subject: Fuel Leak Case RO 3126 - GeoTracker Global ID T10000005132 California Glass Company 155 98th Ave. Oakland 94603

Hello Marc:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Data Gap Investigation Work Plan* (Work Plan) dated June 11, 2014, prepared and submitted on your behalf by TEC Environmental. The work plan was submitted in response to our April 11, 2014 Directive Letter. Thank you for submitting the Work Plan and for claiming your site in Geotracker.

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 work. 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 these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to:karel.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Soil Sample Collection:** The Work Plan states that all borings will be hand cleared for underground utilities using a hand auger; please clarify the method for collecting soil samples from the 1 to 5 feet depth while hand auguring;

2. **Criteria for installation of soil vapor probe:** Please provide the rationale leading to the decision to install a permanent soil vapor probe;

3. **Request for Technical Comments not addressed in Work Plan**: Please address the following technical comments requested in the April 11, 2014 Directive Letter:

a. **General Criteria f – Secondary Source Has Been Removed to the Extent Practicable –** ACEH's review of the case files indicates that insufficient data and analysis has been presented to assess compliance with General Criteria f. No analytical samples were collected to document the environmental quality or nature of the dispenser and pipeline runs, therefore a secondary source may be present in those areas. Please present a strategy in the Data Gap Work Plan to address this Technical Comment.

b. **LTCP Media Specific Criteria for Groundwater –** To satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites listed in the policy. Our review of the case files indicates that the distance of the nearest surface water body to the site is San Leandro Creek located approximately 250 feet to the north of the site. However, insufficient data and analysis has been presented to support the requisite characteristics of plume direction, plume length, distance of nearest water well supply, and stability. Please refer to the Attachment to conduct a preferential pathways sensitive receptor study.

c. **Data Gap Investigation Work Plan and Site Conceptual Model –** Please support the scope of work in the Data Gap Investigation Work Plan with a focused SCM and Data Quality Objectives (DQOs) that relate the data collection to each LTCP criteria. For example please clarify which scenario within each Media-Specific Criteria a sampling strategy is intended to apply to. If the sampling strategy includes data collection to support the proposed site redevelopment, a description of that redevelopment should be included in the Data Gap Investigation Work Plan to support your sampling strategy so that ACEH can verify the appropriateness of the proposed sample locations.

Please include a site map based on historical aerial photographs indicating the location of the former USTs (including the USTs removed in 1994) and the extent of the excavation, any previous excavations, and all UST system appurtenances 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 use (commercial or residential).

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 following specified file naming convention and schedule:

- **September 24, 2014 –** Soil and Groundwater Investigation Report
  File to be named: RO3126_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 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 or call me at (510) 567-6708.

Karel Detterman, PG

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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:

- Beneficial resources (e.g., groundwater classification, wetlands, surface water bodies, natural resources, etc.)
- Subpopulation types and locations (e.g., schools, hospitals, day care centers, elder care facilities, etc.)
- 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.