

From: [Detterman, Karel, Env. Health](#)
To: "Mark Elliott"; [Robert Kitay](#); [JD SERVICES Debris Box](#)
Cc: [Dave Allen](#); [Roe, Dilan, Env. Health](#)
Subject: Fuel leak Case RO3159 and GeoTracker Global ID Number T10000006491 - Roofing Facility, 745 Kevin Court, Oakland, CA 94621
Date: Thursday, July 07, 2016 1:19:50 PM
Attachments: [Attachment 2 Example LTCP Plume Length-Sensitive Receptors from RO474 RFC SCM R 2015-03-10.pdf](#)
[Attachment 1 and ftpUploadInstructions 2014-05-15.pdf](#)

Hello Everyone:

Thank you for participating in the meeting held at the site on June 17, 2016 attended by Alameda County Environmental Health (ACEH) staff, Joe Bernardini, JD Services, the current site occupant, and Robert Kitay, Aqua Sciences Engineers, Inc. (ASE), the Responsible Party (RP's) consultant. Mark Elliott, the RP, was not present but had previously authorized the site meeting to occur without him. The purpose of the meeting was to discuss ACEH's May 26, 2016 Directive Letter, the status of the site, and to identify the next steps to progress the case to closure. 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).

Based on the discussions during our site meeting, ACEH requests that you address the following Technical Comments and submit the requested report by the date provided below. Implementation of the technical comments in our May 26, 2016 Directive Letter will depend on the results of the report.

TECHNICAL COMMENTS:

1. **LTCP Media Specific Criteria for Groundwater** – According to the LTCP, a plume is considered stable or decreasing if a contaminant mass has expanded to its maximum extent. Our review of the case files indicates that insufficient data and analysis has been presented to support the requisite characteristics of the plume length. Total petroleum hydrocarbons as gasoline (TPHg) was detected at 1,000 micrograms per liter (ug/l) and benzene at 16 ug/L in grab groundwater sample BH-C and TPH as diesel (TPHd) was detected at 11,000 ug/L in BH-D during the January 2016 investigation indicating the possible presence of free product and an undefined plume as discussed in the Technical Justification for Vapor Intrusion (VI) Media Specific Criteria for the LTCP:
 - a. Please indicate TPHg, TPHd, and benzene groundwater isoconcentration contours on a site figure.
 - b. Please indicate the locations of all storm drains both on and immediately off the property on an aerial-photograph-based site vicinity figure. Utilizing Geotracker to locate nearby sites with groundwater gradient data, please indicate the local groundwater gradient direction of all neighboring sites on the same figure.
 - c. Please identify on the same figure beneficial resources and other sensitive receptors including but not limited to, groundwater classification, wetlands, surface water bodies, natural resources, schools, hospitals, day care centers, elder care facilities, etc. Please include the Alameda County Flood Control Channel located along the east side of Coliseum Way. Please plot the numbered well locations on an aerial photography-based figure and provide a table with the same numbered well locations similar to the examples provided in Attachment 2.
 - d. 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. The LTCP defines the length of the plume as the maximum extent from the point of release of any petroleum related constituent in groundwater that exceeds the water quality objectives. Please prepare a figure plotting the estimated the average, 90th percentile, and

maximum TPHg, benzene, and MTBE plume length(s) in the local groundwater gradient direction on the same figure requested above and as shown in Attachment 2.

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TECHNICAL REPORT REQUEST
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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:

- **August 18, 2016 – Updated Site Conceptual Model including Sensitive Receptor Survey and Estimated Plume Length**

File to be named: RO3159_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.

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 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
Fax: 510.337.9335
Email: karel.detterman@acgov.org

PDF copies of case files can be downloaded at:

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

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/).

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: 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

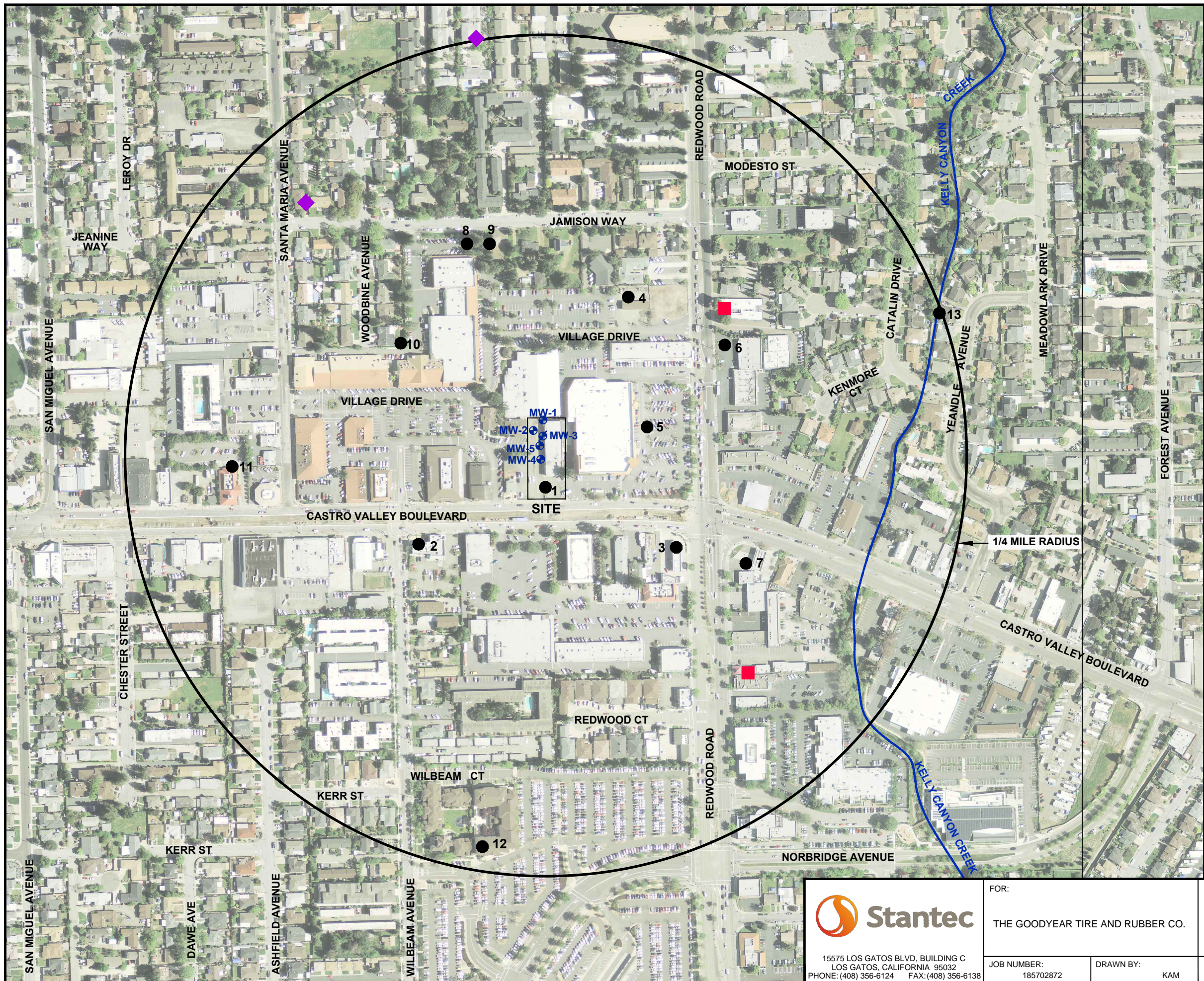
- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- It is **preferable** that reports be converted to PDF format from their original 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)

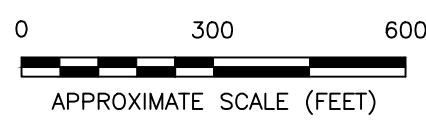
Submission Instructions

- 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
 - 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 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



- 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

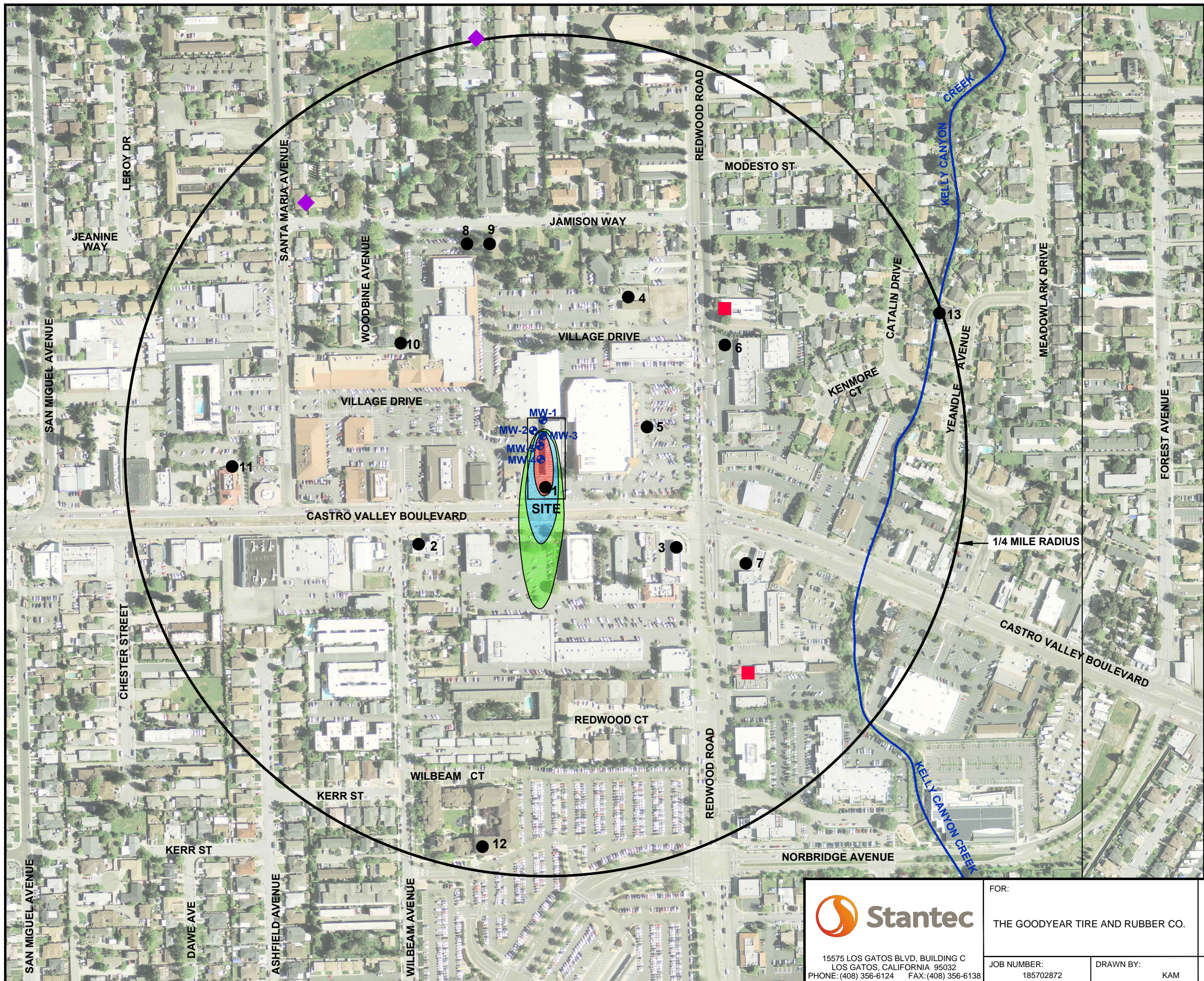


Stantec
 15575 LOS GATOS BLVD, BUILDING C
 LOS GATOS, CALIFORNIA 95032
 PHONE: (408) 356-6124 FAX: (408) 356-6138

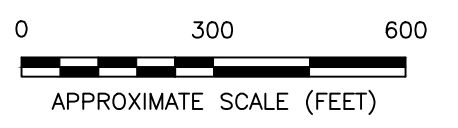
FOR: THE GOODYEAR TIRE AND RUBBER CO.	
JOB NUMBER: 185702872	DRAWN BY: KAM


WELL & SENSITIVE RECEPTOR SURVEY GOODYEAR DEX #9578 3430 CASTRO VALLEY BOULEVARD CASTRO VALLEY, CALIFORNIA	
CHECKED BY: KM	APPROVED BY: GM

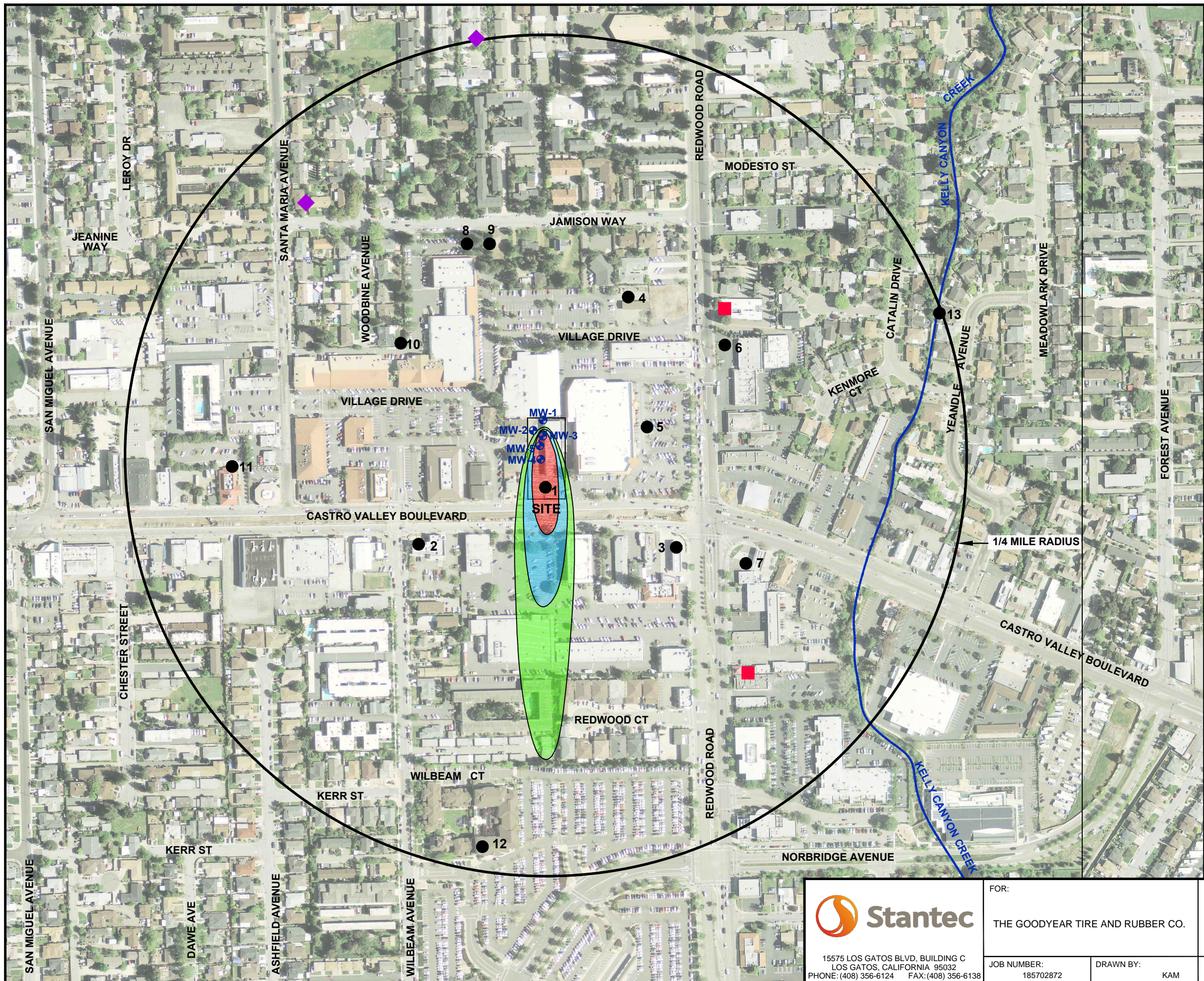
FIGURE: 6
DATE: 01/08/15



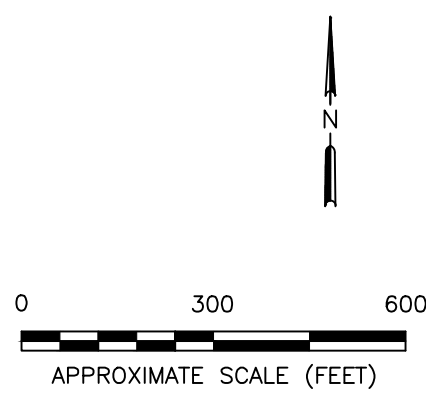
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 - ◆ SCHOOLS WITHIN 1/4-MILE OF SITE
 - ⊕ ACTIVE GROUNDWATER MONITORING WELL LOCATION
 - ⊗ DESTROYED GROUNDWATER MONITORING WELL LOCATION
 - ▭ AVERAGE PLUME LENGTH (5 ug/L)
 - ▭ 90TH PERCENTILE PLUME LENGTH (5 ug/L)
 - ▭ MAXIMUM PLUME LENGTH (5 ug/L)



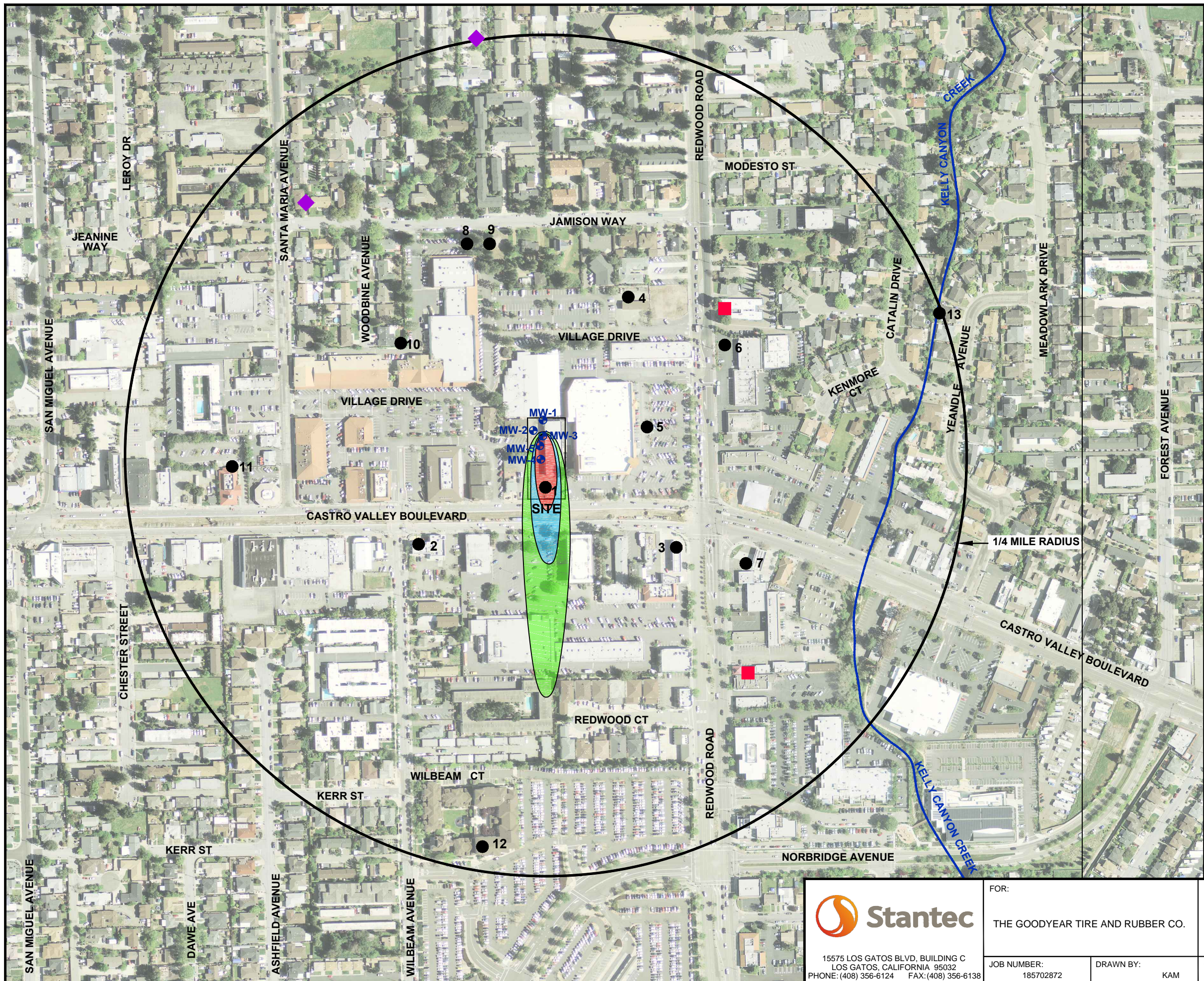
 15575 LOS GATOS BLVD, BUILDING C LOS GATOS, CALIFORNIA 95032 PHONE: (408) 356-6124 FAX: (408) 356-6138	FOR: THE GOODYEAR TIRE AND RUBBER CO.		POTENTIAL BENZENE PLUME LENGTHS BASED ON LTCP TECHNICAL JUSTIFICATION GOODYEAR DEX #9578 3430 CASTRO VALLEY BOULEVARD CASTRO VALLEY, CALIFORNIA		FIGURE: 10
	JOB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



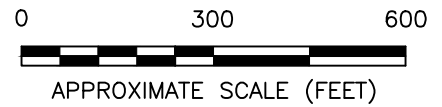
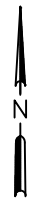
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 - ⊖ DESTROYED GROUNDWATER MONITORING WELL LOCATION
 - ▭ AVERAGE PLUME LENGTH (5 ug/L)
 - ▭ 90TH PERCENTILE PLUME LENGTH (5 ug/L)
 - ▭ MAXIMUM PLUME LENGTH (5 ug/L)




<p>15575 LOS GATOS BLVD, BUILDING C LOS GATOS, CALIFORNIA 95032 PHONE: (408) 356-6124 FAX: (408) 356-6138</p>	FOR: THE GOODYEAR TIRE AND RUBBER CO.		<p>POTENTIAL MTBE PLUME LENGTHS BASED ON LTCP TECHNICAL JUSTIFICATION GOODYEAR DEX #9578 3430 CASTRO VALLEY BOULEVARD CASTRO VALLEY, CALIFORNIA</p>		FIGURE: 11
	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
 - 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:		POTENTIAL TPHg PLUME LENGTHS BASED ON LTCP TECHNICAL JUSTIFICATION GOODYEAR DEX #9578 3430 CASTRO VALLEY BOULEVARD CASTRO VALLEY, CALIFORNIA		FIGURE:
	THE GOODYEAR TIRE AND RUBBER CO.				12
JOB NUMBER:	DRAWN BY:	CHECKED BY:	APPROVED BY:	DATE:	
185702872	KAM	KM	GM	01/08/15	

APPENDIX C
Wells Survey Results
Former Goodyear Tire Store
3430 Castro Valley Boulevard
Castro Valley, CA

	Owner/Site Name	Well Type	Drill Date	Total Depth	Address	Approximate Distance/Direction From Site
1	Merritt Tire Sale	Monitoring Wells	Sept 94, Dec 96, Aug 12	16-20	3430 Castro Valley Blvd.	0
2	CHEVRON #9-4930 / VALLEY CAR WASH	Monitoring Well	Oct-93	20	3369 Castro Valley Blvd.	460 SW
3	Ted Simas (XTRA OIL DBA SHELL STATION)	Monitoring Wells	Feb 90 & Aug 97	18-20	3495 Castro Valley Blvd.	510 SE
4	R. T. Nahas Company (UNOCAL)	Monitoring Wells	Dec 89	25-30	20405 Redwood Rd.	520 NE
5	R. T. Nahas Company	Monitoring Wells	Apr 92	29-37	20629 Redwood Rd	310 E
6	Exxon Oil	Unknown	?	?	20450 Redwood Rd.	650 NE
7	BP #11105 / SHELL 17-1445	Monitoring Well	Sept 92, July 95, Aug 09,	15-30	3519 Castro Valley Blvd.	700 SE
8	R. T. Nahas Company	Domestic/Destroyed	Dec 75	56	3559 JAMISON WAY	700 NNW
9	R. T. Nahas Company	Destroyed	?	20 & 25	3533 JAMISON WAY	725 NNW
10	Horseshoe Drilling	Destroyed	Apr 96	20	20342 Woodbine Ave	600 NW
11	Mitzi Stockel	BOR/MON	Apr-90	8-23	3234 Castro Valley Blvd	1000 W
12	BART	Monitoring Well	Feb 93	16	21000 Wilbeam Ave.	1225 SSW
13	Robert D Rousey	Irrigation	May-77	28	20283 Yeandle Ave.	1325 ENE