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HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
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June 26, 2018

Quik Stop Markets, Inc.
4567 Enterprise Street
Fremont, CA 94538
Attn.: Roger Batra
(Sent via E-mail to: rogerbatra@quikstop.com)

Frederick D. and Geraldine G. Emory Trust
257 Clearview Court
Roseville, CA 95747
Attn: Dewolfe Emory, Trustee

Subject: Request for Data Gap Work Plan and Focused Site Conceptual Model; Fuel Leak Case No. RO0003209 and Geotracker Global ID T10000008568, Quik Stop Market #51, 3130 35th Avenue, Oakland, CA 94619

Dear Responsible Parties:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the documents entitled *Off-Site Well Sampling Report (OSW)*, dated October 30, 2016, *Soil and Groundwater Investigation Report (SWI)*, dated August 5, 2016, and *Underground Storage Tank Removal Report (TNK)*, dated November 4, 1998. The aforementioned documents were prepared for the subject site with the OSW and SWI reports prepared by Compliance & Closure, Inc. (CCI) and the TNK document prepared by Garlow Associates (Garlow).

ACDEH has evaluated the data presented in the above-mentioned reports, in conjunction with the case files, to determine if the site is eligible for closure as a low risk site under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on ACDEH staff review, we have determined that the site fails to meet the LTCP General Criteria d (Free Product), e (Site Conceptual Model), 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 (see GeoTracker).

Additional data may be available that ACDEH is not aware of, or may not have been submitted, and therefore has not been incorporated in to ACDEH's review. If additional data is made available, the data can be incorporated in future LTCP reviews. The evaluation of the site under the LTCP that is presented below is intended to initiate further discussions, submittal of other available documents, or the collection of additional data in order to determine if or when the site can be closed under the LTCP and to document current LTCP data gaps.

Therefore, at this juncture ACDEH requests that you prepare a Data Gap Investigation Work Plan that is supported by a focused Site Conceptual Model (SCM) to address the Technical Comments provided below.

TECHNICAL COMMENTS

- 1. LTCP General Criteria d (Free Product)** – The LTCP requires free product to be removed to the extent practicable at release sites where investigations indicate the presence of free product by removing in a manner that minimizes the spread of the unauthorized release into previously uncontaminated zones by using recovery and disposal techniques appropriate to the hydrogeologic conditions at the site, and that properly treats, discharges, or disposes of recovery byproducts in compliance with applicable laws. Additionally, the LTCP requires that abatement of free product migration be used as a minimum objective for the design of any free product removal system.

ACDEH's review of the case files indicates that insufficient data and analysis has been presented to assess the presence of light non-aqueous phase petroleum hydrocarbons (LNAPL) at the site. Direct evidence of LNAPL has not been reported, and no site-specific groundwater monitoring wells have been installed at the site. However, indirect evidence for the presence of light non-aqueous phase petroleum hydrocarbons