ALAMEDA COUNTY
**HEALTH CARE SERVICES**
AGENCY
COLLEEN CHAWLA, Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY
ALAMEDA, CA 94502
(510) 567-6700
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**June 25, 2018**

**Mercedes Benz of Oakland/Euro Motors Oakland, Inc.**
**c/o Ash Zaki**
**2915 Broadway**
**Oakland CA, 94611**
**(Sent via E-mail to ash.zaki@euromotosca.com)**

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**Belvedere CA, 94920**

**GAB Associates LLC**

**5 W Shore Road**
**Belvedere CA, 94920-2461**

**Subject:** **Review of Subsurface Investigation Report and Request for Work Plan**
**Leaking Underground Storage Tank (LUST) Cleanup Site Case No. RO0003220**
**GeoTracker Global ID T10000009111**
**Mercedes Benz of Oakland**
**340 29th Street, Oakland, CA 94609**

Dear Responsible Party(ies):

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file associated with the above referenced property (the "Site") and evaluated the associated LUST Case (the Case) in accordance with the State Water Resources Control Board's (State Water Board's) Low Threat Underground Storage Tank Case Closure Policy (LTCP). ACDEH's evaluation included, but was not limited to, the review of the following document(s):

1. *Site Investigation Report* dated July 28, 2017 (the "Investigation Report") prepared by Wheeler Group Environmental, LLC (Wheeler Group) on behalf of Mercedes-Benz of Oakland/Euro Motors Oakland, Inc and submitted to ACDEH as requested in ACDEH's directive letter dated April 17, 2017.

ACDEH has determined that the Case does not meet the LTCP closure criteria indicated in Table 1 below:

**Table 1 – Unsatisfied LTCP Closure Criteria**

| General Criteria | | | | Media Specific Criteria | |
|---|---|---|---|---|---|
| ☐ | a. Public Water | ☑ | e. CSM | ☑ | 1. Groundwater |
| ☑ | b. Petroleum Only | ☐ | f. Secondary Source | ☑ | 2. Petroleum Vapor Intrusion to Indoor Air |
| ☐ | c. Release Stopped | ☐ | g. MTBE | ☐ | 3. Direct Contact and Outdoor Air Exposure |
| ☐ | d. Free Product | ☐ | h. Nuisance | | |

An LTCP criteria evaluation checklist is provided in **Attachment A**. Specific details pertaining to ACDEHs evaluation of the LTCP closure criteria indicated above that are not met at this time are provided in ***Section I*** of this letter. ACDEH's identification of environmental conditions unrelated to case closure under the LTCP are provided in ***Section II***. An evaluation of the case's GeoTracker compliance is included in ***Section III***. Deliverables and technical reports requested to address unsatisfied LTCP closure criteria or other impediments to regulatory case closure are summarized in ***Section IV***.

## I. UNSATISFIED LTCP CLOSURE CRITERIA EVALUATION

The following unsatisfied LTCP closure criteria were identified during ACDEH's review of the case file. Excerpts from the LTCP are included in *grey italics*.

### General Criteria

#### b. The unauthorized release consists only of petroleum

*"…For the purposes of this policy, petroleum is defined as crude oil, or any fraction thereof…including the following substances: motor fuels, jet fuels, distillate fuel oils, residual fuel oils, lubricants, petroleum solvents, and used oils, including any additives and blending agents such as oxygenates contained in the formulation of the substances."*

ACDEH's review of the case files indicates that non-petroleum contaminants have been detected in environmental media at the Site. Specifically, chlorobenzene and chlorinated ethenes were identified in groundwater, soil, and soil vapore samples at the Site. Chlorobenzene is commonly utilized as cleaning and degreasing agents to remove water insoluble debris or scaling from metal, plastic, and fiberglass. Chlorobenzene is also a precursor (and impurity) in the production of dichlorobenzene which is a major component in common automobile engine and carburetor cleaners[1]. Chlorinated ethenes are common in cleaning solvents and degreasers.

This Site is currently regulated as a LUST case, which is applicable only to unauthorized releases of petroleum hydrocarbon and related fuel constituents from underground storage tanks. The Investigation Report identifies historic on-site operations (i.e. automotive service garage) and infrastructure (i.e. hydraulic lifts) which may be associated with the identified non-petroluem contaminants. An evaluation to determine the source(s) of non-petroleum contaminants identified has not been completed at this time. In order for the Case to continue to be regulated as a LUST case or closed under the LTCP, ACDEH requires that evidence be provided that non-petroleum contaminants are from a source other than the unauthorized release associated with the Case.

#### e. A conceptual site model (CSM) that assesses the nature, extent, and mobility of the release has been developed

*"The CSM establishes the source and attributes of the unauthorized release, describes all affected media (including soil, groundwater, and soil vapor as appropriate), describes local geology, hydrogeology and other physical site*

[1] United States Environmental Protection Agency, *Locating and Estimating Air Emissions from Sources of Chlorobenzenes (Revised)*. March 1994.

*characteristics that affect contaminant environmental transport and fate, and identifies all confirmed and potential contaminant receptors (including water supply wells, surface water bodies, structures and their inhabitants). …All relevant site characteristics identified by the CSM shall be assessed and supported by data so that the nature, extent and mobility of the release have been established to determine conformance with applicable criteria in this policy."*

ACDEH's review of the case files indicates that data gaps relative to the completeness of the CSM are present with respect to the evaluation of the Media Specific Criteria for Groundwater and Petroleum Vapor Intrusion to Indoor Air which are discussed in ***Section I.1*** and ***Section I.2*** respectively. In addition, ACDEH identified the following data gaps that must be addressed for the CSM to be considered sufficiently complete:

1. **Identification of Property Boundaries** - The Site is identified as portion of an irregular-shaped facility consisting of four parcels. A site plan depicting on-site structures and some infrastructure was provided in the Investigation Report, however, parcel lines and identification were omitted from the site plan. Due to the proximity of other potential sources of petroleum and non-petroleum contamination at the Site, ACDEH requires that parcel lines be depicted on the Site Plan to aid in the planning and implementation of additional investigative activities.

2. **European Motors LTD LUST Cleanup Site (the "European Motors Site")** – The European Motors Site is a LUST Cleanup Site associated with the removal of three USTs and associated pumps and piping. The location of one of the tanks (the 4,000 gallon UST) and its associated fuel pump location are depicted on the Site Map provided in the Investigation Report, however, the location of the remaining two UST systems (reportedly a 1,000 gallon diesel UST and a 550 gallon gasoline tank) are not depicted. Furthermore, historic monitoring wells associated with the site characterization efforts conducted as part of the European Motors Site case are not depicted on the Site Map. Based on ACDEH's review of the case files for the Site, the European Motors Site, and the Alameda County Assessor's Office parcel maps, the 1,000 gallon diesel UST and the 550 gallon gasoline UST associated with the European Motors Site are located on-site or in the immediate vicinity of the Site. ACDEH requires that the locations of these relevant features be included and that the proximity of these UST system components to the Site be evaluated as part of the development of the CSM.

3. **Waste Management Practice:** Current and historic operations at the site characteristically generate waste oil. Storage and disposal practices for waste oil at the Site and associated infrastructure is unknown. Infrastructure commonly associated with on-site operations include floor drains, phase separators, underground or above ground waste oil tanks, and waste storage. Motor oil range total petroleum hydrocarbons and non-petroleum constituents commonly associated with contamination from operations at automotive service stations were identified in soil, groundwater, and/or soil vapor at the Site. ACDEH requires that infrastructure and known practices associated with the storage, handling, and disposal of waste oil or other waste fluids be evaluated to determine if there are other potential sources for non-petroleum releases other than the unauthorized release associated with the Case.

## Media Specific Criteria

### 1. Groundwater

*"If groundwater with a designated beneficial use is affected by an unauthorized release, 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 and summarized in Table 2 below]. A plume that is "stable or decreasing" is a contaminant mass that has expanded to its maximum extent: the distance from the release where attenuation exceeds migration.*

*...Sites with soil that does not contain sufficient mobile constituents…to cause groundwater to exceed the groundwater criteria in this policy shall be considered low-threat sites for the groundwater medium."*

ACDEH's review of the case file indicate that insufficient evidence has been presented to support the determination that the contaminant plume that exceeds water quality objectives (the "Groundwater Plume") is stable or decreasing in areal extent. Please note that the extents of the Groundwater Plume are defined by the water quality objectives and not by the LTCP closure criteria. The extents of the Groundwater Plume are not defined to the north beyond boring B1, to the southeast beyond boring B3 or B6, or the east beyond boring B4. Therefore, the stability of the Groundwater Plume cannot be evaluated at this time.

Additionally, ACDED has determined that until the extents and stability of the Groundwater Plume are defined, the maximum plume length cannot be calculated. As such, the site does not meet any of the Groundwater Site Classes summarized in the table below:

| Table 2 - Summary of Groundwater Site Class Requirements | Groundwater Site Class | | | | |
|---|---|---|---|---|---|
| | (1) | (2) | (3) | (4) | (5) |
| Maximum allowable plume Length (feet) | 100 | 250 | 250 | 1,000 | - |
| Free Product not present [N] or removed to extent practicable[A] [R] | N | N | R | N | - |
| Minimum required distance to nearest existing water supply well or surface water body (feet) | 250 | 1,000 | 1,000 | 1,000 | - |
| Maximum allowable benzene concentration in Groundwater (µg/L) | - | 3,000 | - | 1,000 | - |
| Maximum allowable MTBE concentration in groundwater (µg/L) | - | 1,000 | - | 1,000 | - |
| Potential land use restriction as a condition of closure | - | - | Yes | - | - |
| Regulatory determination that contaminant plume poses a low threat to human health and safety and to the environment and water quality objectives will be achieved in a reasonable timeframe | - | - | - | - | Yes |

"-" = criteria not applicable to site class; "µg/L" = micrograms of analyte per liter of sample; [A] = Free product may still be present below the site where the release originated, but does not extend off-site.

### 2. Vapor Intrusion to Indoor Air

*"Petroleum releases shall satisfy the media-specific criteria for petroleum vapor intrusion to indoor air and be considered low-threat for vapor-intrusion-to-indoor-air pathway if:*

*a. Site-specific conditions at the release site satisfy all of the characteristics and criteria of scenarios 1 through 3 as applicable, or all the characteristics and criteria of scenario 4 as applicable [These scenarios are summarized in Table 3 below]; or*

*b. A site-specific risk assessment for vapor intrusion pathway is conducted and demonstrates that human health is protected to the satisfaction of the regulatory agency; or*

*c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, the regulatory agency determines that petroleum vapors migrating from soil or groundwater will have no significant risk of adversely affecting human health.*

*…satisfaction of the media-specific criteria for petroleum vapor intrusion to indoor air is not required at active commercial petroleum fueling facilities, except in cases where release characteristics can be reasonably believed to pose an unacceptable health risk."*

Direct measurement of soil vapor was attempted at location B4 at a depth of 5.5 feet below ground surface, however, no-flow conditions were encountered which prevented collection of soil vapor samples following standard methods (United States Environmental Protection Agency [USEPA] method TO-15). A soil vapor sample was collected

from this location using US EPA method TO-17 and reported concentrations of benzene, ethylebenzene, and naphthalene were 2.4 µg/m$^3$, 1.0 µg/m$^3$, and 2.5 µg/m$^3$ respectively, however, it is unclear at this time if these data are representative or defensible. Oxygen and leak check compound data could not be collected due to low flow conditions within the vapor probe.

Total petroleum hydrocarbons (calculated as the sum of gasoline and diesel range hydrocarbons) is below the 100 milligram of analyte per kilogram of sample (mg/kg) threshold in all samples except for at location B-4 at depths of 3 to 6.5 feet below ground surface. Groundwater at the site is reportedly encountered between 6 and 7 feet below finished grade. The maximum benzene concentration that has been reported in groundwater at the Site is 15 micrograms of analyte per liter of sample (µg/L) which was reported in groundwater at sample location B3. The criteria for each of the LTCP petroleum vapor intrusion to indoor air Exposure Scenarios is summarized in Table 3 below:

**Table 3 - Petroleum Vapor Intrusion to Indoor Air Exposure Scenario Characteristics and Criteria**

| | Exposure Scenario | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | 1 | 2 | 3 | | | 4 | | | |
| | | | a | b | c | a | b | c | d |
| Bounds of BAZ | BoF to LNAPL in GW | BoF to LNAPL in Soil | BoF to Max GW | | | - | | BOF to 5' below BoF | GS to 5' below GS |
| Minimum BAZ Thickness | 30' | 30' | 5' | 10' | 5' | - | | 5' | |
| TPH in BAZ Threshold (mg/kg) | <100 | <100 | <100 | | | - | | <100 | |
| Benzene in GW Threshold (µg/L) | - | - | <100 | ≥100 and <1,000 | <1,000 | - | | - | |
| Soil Gas Sample Depth | - | - | - | | | 5' below BoF | 5' below GS | 5' below BoF | 5' below GS |
| Oxygen in BAZ | - | - | Unk or <4% | Unk or <4% | ≥4% | - | | ≥4% | |
| Benzene in soil gas of BAZ RES / COM | - | - | - | | | <85 / <280 | | <85,000 / <280,000 | |
| Ethylebenzene in soil gas of BAZ RES / COM | - | - | - | | | <1,100 / <3,600 | | <1,100,000 / <3,600,000 | |
| Napthalene in soil gas of BAZ RES / COM | - | - | - | | | <93 / <310 | | <93,000 / <310,000 | |

"-": Criteria not applicable to exposure scenario; "BAZ": Bioattenuation Zone; "BoF": Base of Foundation; "LNAPL": unweathered light non-aqueous phase liquid; "Max GW": maximum recorded historic groundwater elevation; " ' ": feet; "GS": existing ground surface; "TPH": sum of gasoline range and diesel range total petroleum hydrocarbons; "mg/kg": miligrams of analyze per kilograms of sample; "µg/L": micrograms of analyte per liter of sample; "Unk": Unknown; "RES": residential; "COM": commercial;

ACDEH's review of the case file indicates that insufficient evidence has been presented to support the determination that **Media Specific Criteria a., b., or c. for Petroleum Vapor Intrusion to Indoor Air** listed above have been satisfied, specifically:

a. A determination that the Site meets any of the LTCP Exposure Scenarios cannot be made at this time because:

(i) TPH has been reported above the applicable threshold concentration of 100 mg/kg in soil between 3 feet and 6 feet below ground surface at sample location B4; and

(ii) The areal extents of the groundwater plume that exceeds groundwater quality objectives is unknown and sub-grade building components (i.e. basements) are known to be present in the proximity of the Site. Until the areal extents of the groundwater plume is known, the bioattenuation zone and vertical separation distance from the base of the foundations to contaminated groundwater cannot be determined.

b. A site specific risk assessment has not been completed for the Site at this time; or

c. Engineering controls to mitigation vapor intrusion are not currently installed or employed at the Site.

## II. ENVIRONMENTAL CONDITIONS NOT ASSOCIATED WITH THE LTCP

As discussed in ***Section I.b***, non-LUST case associated constituents of concern have been identified in soil, groundwater, and soil vapor at the Site. ACDEH has also identified historic land uses at the Site associated with the identified non-LUST constituents. Therefore, ACDEH will be opening a separate SCP case for the oversight of investigation and characterization associated with these non-LUST constituents. Non-LUST constituents identified by ACDEH are summarized below:

### 1. Non-petroleum Constituents (Chlorobenzenes) in Soil, Groundwater, and Soil Vapor

Chlorobenzene was identified in soil samples collected from the excavation and over-excavation of the UST system and soil boring B1 through B4. A maximum concentration of chlorobenzene of 3.64 milligrams of analyte per kilogram of sample (mg/kg) was reported within the extents of the excavation for the removal of the UST system in September 2013. The San Francisco Bay Regional Water Quality Control Board's Environmental Screening Levels (ESL) dated February 22, 2016 establish a Tier 1 ESL for chlorobenzene of 1.5 mg/kg on the basis of leaching to groundwater. The vertical and lateral extents chlorobenzene in soil above the Tier 1 ESL are bound by the current data set except along the eastern most bound of the data set (Soil boring B4-SQ).

Chlorobenezene was identified as present in groundwater samples collected from soil borings B1 through B6 at a maximum concentration of 4,900 micro-grams of analyte per liter of sample (µg/L) in the groundwater sample collected from soil boring B4, which is co-located with the maximum detection of chlorobenzene in soil (B4-SG). This concentration exceeds the ESLs for direct exposure human health risk levels (70 µg/L), the aquatic habitat goal levels for fresh water and saltwater ecotoxicity (25 and 65 µg/L respectively) and the odor nuisance levels for both drinking and non-drinking water (50 and 500 µg/L respectively). Chlorobenzene was not present above the laboratory reporting limit of 0.16 µg/L in the grab sample collected from the standing water of the cross-gradient basement at the adjacent 2901 Broadway property.

Chlorobenzene was not reported as present in the soil vapor samples collected from boring B4-SG, however, polychlorobenzene species were reported as present. As identified in ***Section I.b***, chlorobenzene is a precursor and degradant of polychlorobenzenes.

The extents of the chlorobenzene groundwater plume, soil impacts, and soil vapor are not bound by the current analytical data set. Additionally, a CSM that evaluates the fate and transport of chlorobenzene and that evaluates exposure pathways and receptors for chlorobenzene has not been completed.

### 2. Non-petroleum constituents (Chlorinate Ethenes) in Soil, Groundwater, and Soil Vapor

Cis-1,2-DCE was reported as present in only one sampling location (B3-GW) at a concentration of 7.8 µg/L which exceeds the direct exposure human health risk ESL of 6.0 µg/L, but is below all other applicable ESLs. Parent products Tetrachloroethene (PCE) and Trichloroethene (TCE) were not reported as present in any of the six groundwater samples collected above their respective laboratory reporting limits which ranged from 0.15 µg/L to 2.5 µg/L. Similarly, daughter product vinyl chloride (VC) was not reported as present in any of the groundwater samples collected, however, the laboratory reporting limit for vinyl chloride exceeded the applicable groundwater ESL of

0.061 µg/L and therefore cannot be fully evaluated. Groundwater samples to evaluate the presence of DCE or other chlorinate ethenes PCE, TCE or VC to the east or west of B3 have not been collected.

Chlorinated ethenes PCE and TCE were reported as present above the laboratory reporting limit in the soil vapor sample collected from the soil vapor probe B4-SG at concentrations of 0.89 micro-grams of analyte per cubic meter of sample (µg/$m^3$) and 0.52 µg/$m^3$ respectively. Although the concentrations of chlorinated ethenes are below the applicable Tier 1 ESLs, soil vapor analytical data at the site is limited to a single sample. As such spatial extents and variability and the temporal stability of chlorinated ethenes in soil vapor cannot be evaluated at this time.

Based on the available data set, there is insufficient data to determine that (a) there is not an on-site source of chlorinated ethene contamination; (b) There is not a groundwater plume that exceeds water quality objectives for chlorinated ethenes present beneath the Site; and (c) there is not a soil vapor plume of chlorinated ethenes at the Site that presents an unacceptable risk to human health or the environment.

## III. GEOTRACKER COMPLIANCE

ACDEH's review of the case file included a GeoTracker compliance audit. GeoTracker reporting requirements are described in Section 3893 of the California Code of Regulations. Non-compliant GeoTracker requirements identified as part of ACDEH's compliance audit are identified in the table below.

**Table 4 – Non-compliant GeoTracker Requirements**

| | | | |
|---|---|---|---|
| ☐ | Latitude and longitude of wells (GEO_XY) | ☐ | Depth and length of screened interval of wells (Field Point ID) |
| ☐ | Surveyed elevation of wells (GEO_Z) | ☐ | Boring log (GEO_BORE) |
| ☐ | Elevation of groundwater in wells (GEO_WELL) | ☐ | Technical report (GEO_REPORT) |
| ☐ | Site map(s) depicting location of all sampling points (GEO_MAP) | | |

## IV. DELIVERABLE AND TECHNICAL REPORT REQUEST(S)

Please submit the following technical reports and deliverables to ACDEH (Attention: Jonathan Sanders ) in accordance with the compliance dates provided below and the *Responsible Party(ies) Legal Requirements/Obligations* and the *File Names for Electronic Reports* which are included as **Attachment B** and **Attachment C** respectively. These technical reports are being requested pursuant to Section 25296.10 of the California Health and Safety Code and Article 11, Chapter 16, Division 3 of Title 23 of the California Code of Regulations. Failure to comply with the deliverable and technical report request compliance dates listed below could result in enforcement action(s) as described in Attachment B.

### 1. Data Gap Evaluation, Work Plan, & Updated Site Conceptual Model
### Compliance Date: September 19, 2018

Please prepare a work plan to address the data gaps identified in ACDEH's Unsatisfied LTCP Closure Criteria Evaluation. The Subsurface Investigation Work Plan must be prepared in general accordance with the State Water Boards *Leaking Underground Fuel Tank Guidance Manual* (the LUFT Manual) and must contain the following elements:

a. A CSM reflecting current site conditions and identifying data gaps that must be addressed to satisfy LTCP closure criteria. The updated CSM must either provide technical justification and supporting evidence to address the data gaps identified in ***Section I.b*** and ***Section I.e*** or must identify these data gaps as impediments to closure under the LTCP. ACDEH recommends that the CSM be prepared using ACDEH's

tabular format. A template for the preparation of a CSM following this tabular format is available on request.

b. A description of the Scope of Work (SOW) with technical justification for monitoring well and/or sample location selection that is supported by the CSM to address data gaps identified in the CSM as impediments to closure under the LTCP. If a dynamic work plan is used, decision criteria should be identified and described; The scope of work must include:

   i. Evaluation and/or collection of additional lines of evidence to determine if non-petroleum constituents identified at the Site are associated with the unauthorized release or from other sources;

   ii. Collection of additional lines of evidence to evaluate the lateral extents, stability, and maximum length of the Groundwater Plume;

   iii. Collection of additional lines of evidence to support to evaluate the lateral and vertical extents of soil contamination in the vicinity of boring B4 that exceeds the 100 mg/kg threshold for TPH in a bioattenuation zone required in each of the LTCP Exposure Scenarios for petroleum vapor intrusion;

   iv. Collection of additional lines of evidence to evaluate the vapor intrusion risk at the Site. This should include (1) evaluation of the lateral and vertical extents of soil contamination in the vicinity of boring B4 that exceeds the 100 mg/kg threshold for TPH in a bioattenuation zone; and (2) collection of additional soil vapor data to support evaluation under LTCP Exposure Scenario 4;

c. A sampling and analysis plan, including identification of DQOs, analytical methods, sampling methods, sampling intervals and criteria, and quality control and quality assurance measures; Sampling methods must reference an Standard Operating Procedure which must be included as an appendix; and

d. A description of reporting requirements.

## 2. Stakeholders Meeting
**Compliance Date: September 19, 2018**

Please schedule a stakeholders meeting to discuss the non-petroleum constituents identified at the site and the opening of a separate SCP case for the characterization of the non-petroleum constituents discussed in ***Section II***. This meeting must be held by the compliance data listed above.

## V. CLOSING

ACDEH looks forward to continuing to work with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please contact the primary caseworker, Jonathan Sanders who can be reached by phone at (510)567-6791 or by email at jonathan.sanders@acgov.org.

Sincerely,

Dilan Roe, P.E. C73703
Chief
Land & Water Division

Jonathan Sanders
Senior Hazardous Materials Specialist
Local Oversight and Site Cleanup Program

## ENCLOSURES:

Attachment A LTCP Closure Criteria Evaluation Checklist

Attachment B Responsible Party(ies) Legal Requirements / Obligations

Attachment C File Names for Electronic Reports

## DISTRIBUTION LIST:

Electronic File, GeoTracker

Dilan Roe, ACDEH, Chief Land, Water Division (Sent via E-mail to: *dilan.roe@acgov.org*)

Jonathan Sanders, ACDEH, Senior Hazardous Materials Specialist (Sent via E-mail to: jonathan.sanders@acgov.org)

Brent Wheeler, Wheeler Group, (sent via E-mail to: bwheeler@wheelergroupenvironmental.com)

# ATTACHMENT A

## LTCP Closure Criteria Evaluation Checklist

MERCEDES BENZ OF OAKLAND (T10000009111) - MAP THIS SITE

340 29TH STREET
OAKLAND , CA 94609-3401
ALAMEDA COUNTY
**LUST CLEANUP SITE** (INFO)
STATUS: OPEN - ACTIVE

**CLEANUP OVERSIGHT AGENCIES**
ALAMEDA COUNTY LOP *(LEAD)* - *CASE #: RO0003220* - *JONATHAN E. SANDERS* - *DILAN ROE*
SAN FRANCISCO BAY RWQCB (REGION 2)



THIS PROJECT WAS LAST MODIFIED BY ***JONATHAN E. SANDERS*** ON 6/19/2018 11:28:27 AM - HISTORY

## CLOSURE POLICY

*THIS VERSION IS FINAL AS OF 6/19/2018*

*CHECKLIST INITIATED ON 6/30/2017*

CLOSURE

**General Criteria** - *The site satisfies the policy general criteria* - CLEAR SECTION ANSWERS

NO

a. Is the unauthorized release located within the service area of a public water system?

**Name of Water System :**
East Bay Municipal Utility District

b. The unauthorized release consists only of petroleum (info).

**Contaminants :** ☑ **Chlorobenzene** ☐ **PCE** ☐ **TCE** ☐ **Chloroform** ☐ **Vinyl Chloride** ☐ **Bromoform**
☐ **Other:**

c. The unauthorized ("primary") release from the UST system has been stopped.

d. Free product has been removed to the maximum extent practicable (info). ◉ FP Not Encountered

e. A conceptual site model that assesses the nature, extent, and mobility of the release has been developed (info).

**Description (Check all that Apply):**
- ☐ **GW Not Evaluated**
- ☑ **Groundwater Assessment Incomplete - Areal Extent of Contamination Not Defined**
- ☑ **Groundwater Assessment Incomplete - Depth of Contamination Not Defined**
- ☐ **Hydrogeology Not Adequately Defined**
- ☐ **Potential Receptors Not Identified**
- ☐ **Soil Assessment Incomplete - Areal Extent Not Defined**
- ☐ **Soil Assessment Incomplete - Depth Unknown**
- ☐ **Soil Vapor Not Evaluated**
- ☑ **Other -**

Soil vapor evaluation cannot be completed until areal extent of groundwater plume is known due to the presence of nearby sub-grade building components.

f. Secondary source has been removed to the extent practicable (info).

g. Soil or groundwater has been tested for MTBE and results reported in accordance with Health and Safety Code Section 25296.15. ○ Not Required

h. Does a nuisance exist, as defined by Water Code section 13050.

**1. Media-Specific Criteria: Groundwater** - *The contaminant plume that exceeds water quality objectives is stable or decreasing in areal extent, and meets all of the additional characteristics o one of the five classes of sites listed below.* - CLEAR SECTION ANSWERS

**EXEMPTION - Soil Only Case (Release has not Affected Groundwater - Info)**

**Does the site meet any of the Groundwater specific criteria scenarios?**

**ADDITIONAL QUESTIONS - Please indicate only those conditions that do not meet the policy criteria:**

**Plume Length (That Exceeds Water Quality Objectives) :**
○ ≥ 100 Feet and < 250 Feet ○ ≥ 250 Feet and < 1,000 Feet ○ ≥ 1,000 Feet ◉ Unknown

**Plume is Stable or Decreasing in AREAL Extent :**
○ No ◉ Unknown

**Free Product in Groundwater :**
○ Yes ○ No ○ Unknown

**Free Product Has Been Removed to the Maximum Extent Practicable :**
○ No ○ Unknown

**For sites with free product, the Plume Has Been Stable or Decreasing for 5-Years (info) :**
○ No ○ Unknown

**For sites with free product, owner Willing to Accept a Land Use Restriction (if required) :**
○ No ○ Unknown

**Free Product Extends Offsite :**
○ Yes ○ Unknown

**Benzene Concentration :**
○ ≥ 1,000 µg/l and < 3,000 µg/l ○ ≥ 3,000 µg/l ○ Unknown

**MTBE Concentration :**
○ ≥ 1,000 µg/l ○ Unknown

**Nearest Supply Well (From Plume Boundary) :**
○ ≤ 250 Feet ○ > 250 Feet and ≤ 1,000 Feet ○ Unknown

**Nearest Surface Water Body (From Plume Boundary) :**
○ ≤ 250 Feet ○ > 250 Feet and ≤ 1,000 Feet ○ Unknown

**2. Media Specific Criteria: Petroleum Vapor Intrusion to Indoor Air** - *The site is considered low-threat for the vapor-intrusion-to-air pathway if site-specific conditions satisfy items 2a, 2b, or 2*
CLEAR SECTION ANSWERS

**EXEMPTION - Active Commercial Petroleum Fueling Facility**

**Does the site meet any of the Petroleum Vapor Intrusion to Indoor Air specific criteria scenarios?**

**ADDITIONAL QUESTIONS - Please indicate only those conditions that do not meet the policy criteria:**

**Soil Gas Samples :**

○ No Soil Gas Samples ○ Taken Incorrectly

**Exposure Type :**

○ Residential ○ Commercial

**Free Product :**

○ In Groundwater ○ In Soil ○ Unknown

**TPH in the Bioattenuation Zone :**

○ ≥ 100 mg/kg ○ Unknown ○ Soil samples not taken at two depths within 5 ft. zone (only for Scenario 4 with BioZone)

**Bioattenuation Zone Thickness :**

○ < 5 Feet (No BioZone) ○ ≥ 5 Feet and < 10 Feet ○ ≥ 10 Feet and < 30 Feet ○ ≥ 30 Feet ○ 30ft BioZone Compromised TPH > 100mg/kg ◉ Unknown

**O2 Data in Bioattenuation Zone :**

◉ No $O_2$ Data ○ $O_2$ < 4% ○ $O_2$ ≥ 4%

**Benzene in Groundwater :**

○ ≥ 100 µg/l and < 1,000 µg/l ○ ≥ 1,000 µg/l ○ Unknown

**Soil Gas Benzene :**

○ ≥ 85 µg/$m^3$ and < 280 µg/$m^3$ ○ ≥ 280 µg/$m^3$ and < 85,000 µg/$m^3$ ○ ≥ 85,000 µg/$m^3$ and < 280,000 µg/$m^3$ ○ ≥ 280,000 µg/$m^3$ ○ Unknown

**Soil Gas EthylBenzene :**

○ ≥ 1,100 µg/$m^3$ and < 3,600 µg/$m^3$ ○ ≥ 3,600 µg/$m^3$ and < 1,100,000 µg/$m^3$ ○ ≥ 1,100,000 µg/$m^3$ and < 3,600,000 µg/$m^3$ ○ ≥ 3,600,000 µg/$m^3$ ○ Unknown

**Soil Gas Naphthalene :**

○ ≥ 93 µg/$m^3$ and < 310 µg/$m^3$ ○ ≥ 310 µg/$m^3$ and < 93,000 µg/$m^3$ ○ ≥ 93,000 µg/$m^3$ and < 310,000 µg/$m^3$ ○ ≥ 310,000 µg/$m^3$ ○ Unknown

**3. Media Specific Criteria: Direct Contact and Outdoor Air Exposure** - *The site is considered low-threat for direct contact and outdoor air exposure if it meets 1, 2, or 3 below.* - CLEAR SECTION ANSWERS

**EXEMPTION - The upper 10 feet of soil is free of petroleum contamination**

**Does the site meet any of the Direct Contact and Outdoor Air Exposure criteria scenarios?**

3(a) - Maximum concentrations of petroleum constituents in soil are less than or equal to those listed in the following table (LINK) for the specified depth below ground surface. ◉

**Additional Information**

Should this case be closed in spite of NOT meeting policy criteria?

Has this LTCP Checklist been updated for FY 17/18?

SPELL CHECK

Save Form as Partially Completed | Save Form as Complete

**ATTACHMENT B**

**Responsible Party(ies) Legal Requirements / Obligations**

| Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) | **REVISION DATE:** December 14, 2017 |
|---|---|
| | **ISSUE DATE:** July 25, 2012 |
| | **PREVIOUS REVISIONS:** September 17, 2013, May 15, 2014, December 12, 2016 |
| **SECTION:** ACDEH Procedures | **SUBJECT:** Responsible Party(ies) Legal Requirements / Obligations |

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values[1] as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

**GeoTracker Upload Table Example**

| Report Title | Sample Period | PDF Report | GEO_MAPS | Sample ID | Matrix | GEO_Z | GEO_XY | GEO_BORE | GEO_WELL | EDF |
|---|---|---|---|---|---|---|---|---|---|---|
| **2016 Subsurface Investigation Report** | 2016 S1 | ✓ | ✓ | Effluent | SO | ☐ | ☐ | ☐ | ☐ | ✓ |
| **2012 Site Assessment Work Plan** | 2012 | ✓ | ✓ | | | ☐ | ☐ | ☐ | ☐ | ☐ |
| **2010 GW Investigation Report** | 2008 Q4 | ✓ | ✓ | SB-10 | W | ✓ | ☐ | ☐ | ☐ | ✓ |
| | | | | SB-10-6 | SO | ☐ | ☐ | ☐ | ☐ | ✓ |
| | | | | MW-1 | WG | ✓ | ✓ | ✓ | ✓ | ✓ |
| | | | | SW-1 | W | ✓ | ✓ | ✓ | ✓ | ✓ |

[1] GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

| Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) | **REVISION DATE:** NA |
|---|---|
| | **ISSUE DATE:** December 14, 2017 |
| | **PREVIOUS REVISIONS:** September 17, 2013, May 15, 2014, December 12, 2016 |
| **SECTION:** ACDEH Procedures | **SUBJECT:** Responsible Party(ies) Legal Requirements / Obligations |

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) 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 licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: http://www.bpelsg.ca.gov/laws/index.shtml.

UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.

# ATTACHMENT C

## File Names for Electronic Reports

| Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) | **REVISION DATE:** April 4, 2018 |
|---|---|
| | **PREVIOUS REVISIONS:** April 4, 2018, July 17, 2017, November 8, 2016, December 15, 2015, December 16, 2014, June 19, 2013, June 15, 2011, March 26, 2009, April 29, 2008 |
| | **ISSUE DATE:** June 16, 2006 |
| **SECTION:** Miscellaneous Administrative Topics & Procedures | **SUBJECT:** File Names for Electronic Reports |

Format: REPORT_NAME_R_YYYY-MM-DD
Ex: SWI_R_VOL1_2006-05-25

| LOP and SCP (VRAP) INCOMING REPORTS AND LETTERS | |
|---|---|
| **Document Name** | **Abbreviation File Name= Abbreviation + Date (yyyy- mm-dd)** |
| Abandoned Well Information/Water Supply Well Information | ABWELLINF_R |
| Addendum | ADEND_R (added after report name) |
| Additional Information Report | ADD_R |
| Analytical Reports (Loose data sheets not in report) | ANALYT_R |
| As Built Drawings (or Plans) | AS_BUILT |
| Case File Scanned By OFD | CASE_FILE |
| Cleanup and Abatement Report | CAO_R |
| Case Transfer Form (from CUPA) | CASE_TRNSFR_F |
| Conduit Study/Well Search/Sensitive Receptor/Well Survey/Preferential Pathway Study | COND_WELL_R |
| Corrective Action Plan (CAP) | CAP_R |
| Correspondence | CORRES_L |
| Court Injunctions | INJ_L |
| Development Entitlement | DEV_ENTITLE |
| Development Plans (Includes Plan Set, Cross-sections, and Related Drawings) | DEV_PLAN |
| Development Schedule (Project Schedule, Gant Chart, etc.) | DEV_SCHD |
| DWR Confidential Well Logs (Report containing) | report name_R_CONFIDENTIAL_YYYY-MM-DD (Ex: SWI_R_CONFIDENTIAL_YYYY-MM-DD) |
| DWR Well Completion Report-Confidential (Loose well logs) | DWR_WELL_CONFIDENTIAL_YYYY-MM-DD (Date of Well Log) |
| ESI/DAR (Environmental Site Investigation, Data Assessment Report | ESI_R |
| Excavation Report | EX_R |
| Extension Request Letter | EXT_RQ_L |

| | |
|---|---|
| Fact Sheet | FACT_SHT |
| Feasibility Study | FEASSTUD_R |
| Groundwater Monitoring/Quarterly Summary Report | GWM_R |
| Financial Assurance/Letter of Credit | FNCL_ASSRNC_LOC |
| Interim Remedial Action Plan | IRAP_R |
| Interim Remediation Results (Includes Pilot Test Reports, Vapor Mitigation Reports, Soil Management Reports, Free Product Removal Reports, & Dual-Phase Extraction Reports) | IR_R |
| Lawsuit | LAWSUIT_R |
| Migration Control Report | MIG_R |
| Miscellaneous Report/Soil Sample | MISC_R |
| Miscellaneous Sample Report (analytical results) | MISC_SAMP_R |
| Notification Letter | NOT_L |
| NPDES Miscellaneous Reports | NPDES_R |
| Operations & Maintenance Plan | OM_P |
| Operations & Maintenance Report | OM_R |
| Pay for Performance | PFP_R |
| Petition | PETITION_R |
| Phase 1 Environmental Assessment Report | PHASE1_R |
| Photos | PHOTO |
| Preliminary Site Assessment Report/Phase 2 (historic reports only) | PSA_R |
| Remedial Action Plan | RAP_R |
| Remedial Design & Implementation Plan | RDIP_R |
| Remediation Progress Report | REM_R |
| Request for Closure | RFC(_L or _R) |
| Risk Assessment Report | RISK_R |
| Risk Based Corrective Action | RBCA_R |
| List of Landowners Forms | LNDOWNR_F |
| SB2004 Letter of Commitment | LOC_L |
| Site Conceptual Model/Conceptual Site Model | SCM_R |
| Site Health & Safety Plan | SFTY_PLAN_R |
| Site Management | SITE_MANAGE_R_ |
| Acknowledgement Statement for Site Management Plan | SMP_ACK_L |
| Site Management Plan | SMP_R |
| Site Summary Report | SITE_SUM_R |

| | |
|---|---|
| Soil and Water Investigation Report (Includes soil gas/vapor reports, indoor, additional site investigation, well installation, site characterization, cross section, indoor air, additional onsite investigation, Phase II/preliminary site assessment) | SWI_R |
| Soil Disposal Report | SOIL_DSPL_R |
| Source Area Characterization | SOURCAREA_R |
| State Information | STATE_INFO (no date) |
| Status Report(monthly remediation status reports addressed to sanitary district requires no stamp/perjury letter) | STAT_R |
| Tank/Tank System Removal Report | TNK_R |
| Tentative Order Report | TENT_R |
| Unauthorized Release Form | URF_R |
| UST Sampling Report | UST_SAMP_R |
| USTCF 5 Year Review | USTCF_5YR |
| USTCF issued Public Notice | USTCF_PP_L |
| Well Construction Report (limited to water supply wells) | WELL_CST_R |
| Well Decommissioning Report/Letter (well destruction/abandonment) | WELL_DCM_R |
| Work Plan | WP_R |