

Jurek, Anne, Env. Health

From: Jurek, Anne, Env. Health
Sent: Friday, February 17, 2017 10:19 AM
To: 'Brent Wheeler'
Cc: Ash Zaki; Mark Youngkin
Subject: RE: Technical Comments on Draft Work Plan and Request for Work Plan for Fuel Leak Case No. RO0003220 and GeoTracker Global ID T10000009111, Mercedes Benz of Oakland, 344 29th Street, Oakland, CA 94609

ACDEH extends the submittal date of the requested Work Plan to March 17, 2017.

Anne Jurek, MS, California GIT 731

Professional Technical Specialist II (Geology)

Alameda County Department of Environmental Health (ACDEH)

1131 Harbor Bay Pkwy

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anne.jurek@acgov.org

From: Brent Wheeler [mailto:bwheeler@wheelergroupenvironmental.com]
Sent: Thursday, February 16, 2017 10:15 AM
To: Jurek, Anne, Env. Health <Anne.Jurek@acgov.org>
Cc: Ash Zaki <ash.zaki@euromotorsca.com>; Mark Youngkin <mark.youngkin@gmail.com>
Subject: RE: Technical Comments on Draft Work Plan and Request for Work Plan for Fuel Leak Case No. RO0003220 and GeoTracker Global ID T10000009111, Mercedes Benz of Oakland, 344 29th Street, Oakland, CA 94609

Anne,

On behalf of Mercedes-Benz of Oakland, Wheeler Group Environmental, LLC is requesting a brief extension for submittal of the Final Work Plan for the subject Fuel Leak Case investigation, to allow sufficient time to complete the preferential pathway survey and analysis as requested in technical Comment No. 3 below. We are attempting to schedule a Private Utility Survey at the Site next week, based on preferred vendor availability.

We anticipate completing the Work Plan on or before March 17, 2017. Please contact us with any questions.

Regards,

Brent A. Wheeler
Wheeler Group Environmental, LLC
369-B Third Street, Suite #221
San Rafael, CA 94901

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Email: bwheeler@wheelergroupenvironmental.com



From: [Jurek, Anne, Env. Health](#)

Sent: Thursday, January 26, 2017 10:19 AM

To: [Brent Wheeler](#); [Ash Zaki](#)

Subject: Technical Comments on Draft Work Plan and Request for Work Plan for Fuel Leak Case No. RO0003220 and GeoTracker Global ID T10000009111, Mercedes Benz of Oakland, 344 29th Street, Oakland, CA 94609

Dear Mr. Zaki and Mr. Wheeler,

ACDEH has reviewed the fuel leak case file for the above referenced site, including the most recent document entitled, "*Draft Work Plan*," dated October 14, 2016, that was received by ACDEH via email on October 15, 2016. The Draft Work Plan, which was prepared by Wheeler Group Environmental, LLC, on behalf of Mercedes Benz of Oakland, presents plans for collecting soil and groundwater samples from four borings and a soil gas sample from one soil vapor probe to evaluate the lateral extent of the soil and groundwater contamination at the site in order to determine whether the site is eligible for closure under the State Water Resources Control Board Low-Threat Closure Policy (LTCP). Based on our review, we request that you submit a Work Plan that addresses the technical comments below.

TECHNICAL COMMENTS

- **Tables of Soil and Groundwater Laboratory Analytical Results for Volatile Organic Compounds.** Tables 5 and 6 that provide soil and groundwater laboratory analytical results for Volatile Organic Compounds (VOCs) of sampling performed during the underground storage tank (UST) investigation contain errors in the listed analytes, analytical data and/ or the respective Tier 1 ESL values. Please compile new tables that show the results of detected VOCs.
- **Site Vicinity Map.** Please include a scale on the Site Vicinity Map (Figure 2) and all other maps that may not have one.
- **Preferential Pathway Study.** The Work Plan should include an analysis of preferential pathways, including a utility survey and the identification basements adjacent to the site.
- **Soil Sample Selection Protocols.** The work plan proposes to collect and retain for laboratory analysis soil samples at pre-defined depths of 5 and 10 feet below ground surface (bgs), and also states that additional samples will be collected at signs of contamination such as photoionization detections (PID), staining, and odor, and at major lithologic changes. In addition, ACDEH requests that if staining, odor, or elevated PID readings are not observed, that soil samples be collected from 1.5 to 2.0 feet bgs, 3.5 to 4.0 feet bgs, and 7.5 to 8.0 feet bgs, in addition to the pre-defined depths of 5 and 10 feet bgs.
- **Laboratory Analyses of Soil and Groundwater.** In addition to the analyses that are proposed for soil and groundwater samples in the draft work plan, ACDEH requests that analyses of Total Petroleum Hydrocarbons as motor oil (TPH-mo) using EPA Method 8015 for soil and groundwater be included in the work plan, as TPH-mo is a contaminant of concern. The groundwater analysis for TPH-mo should be performed both with and without silica gel cleanup.
- **Laboratory Analyses of Soil Gas.** In addition to the analyses of methane and oxygen that are proposed (in the draft work plan), we request that carbon dioxide, naphthalene, full list of VOCs, and TPH as gasoline (TPH-

g) be analyzed also. VOCs in soil gas should analyzed by both In addition to naphthalene analysis by TO-15, please analyze for naphthalene by TO-17 in conformance with DTSC guidance for naphthalene vapor analysis (Appendix D, Active Soil Gas Investigations, July 2015, DTSC) in conformance with DTSC guidance for naphthalene vapor analysis (Appendix D, *Active Soil Gas Investigations*, July 2015, DTSC).

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

Please note that ACDEH has updated its Attachment 1 with regard to report submittals to ACDEH. ACDEH will now be requiring a Submittal Acknowledgement Statement, replacing the Perjury Statement, as a cover letter that is to be signed by the Responsible Party (RP). The language for the Submittal Acknowledgement Statement is as follows:

"I have read and acknowledge the content, recommendations, and and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the State Water Resource Control Board's GeoTracker website."

Please include this in your submittals to ACDEH.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH FTP site (Attention: Anne Jurek), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **February 17, 2017** – Work Plan

File to be named: RO3220_WP_R_yyyy-mm-dd RO3220

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.

ATTACHMENTS

Please see the attached PDF regarding Responsible Party(ies) Legal Requirements/Obligations and ACDEH Electronic Report Upload (FTP) Instructions.

If you have any questions, please call me at (510) 567-6721 or send me an electronic mail message at anne.jurek@acgov.org. Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>

Sincerely,

Anne Jurek, M.S.

Professional Technical Specialist II (Geology)

Alameda County Department of Environmental Health (ACDEH)

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Alameda, CA 94502

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