

**State Water Resources Control Board**

**REVIEW SUMMARY REPORT – ADDITIONAL WORK  
PRELIMINARY REVIEW – NOVEMBER 2014**

**Agency Information**

Agency Name: Alameda County Environmental Health Department (County)	Address: 1131 Harbor Bay Parkway Alameda, CA 94602
Agency Caseworker: Karel Detterman	Case No.: RO0000354

**Case Information**

USTCF Claim No.: 8996	GeoTracker Global ID: T0600101062
Site Name: Hertz-Penske	Site Address: 725 Julie Ann Way Oakland, CA 94621
Responsible Party: Penske Truck Leasing Attn: Chris Hawk	Address: PO Box 7635 Reading, PA 19603
USTCF Expenditures to Date: \$0	Number of Years Case Open: 24

**URL:** [http://geotracker.waterboards.ca.gov/profile\\_report.asp?global\\_id=T0600101062](http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0600101062)

**Summary**

The Low-Threat Underground Storage Tank (UST) Case Closure Policy (Policy) contains general and media-specific criteria, and cases that meet those criteria are appropriate for closure pursuant to the Policy. This case does not meet all of the required criteria of the Policy. Highlights of the case follow:

This Site is an active maintenance facility and truck staging area. An unauthorized release was reported in December 1989 following the removal of four UST (one gasoline, two diesel, and one waste oil) in October 1989. Approximately 235 tons of impacted soil were excavated and disposed offsite in 1989. In addition, 300 gallons of contaminated groundwater were removed during excavation in 1989. Oxygen releasing compound socks were placed in wells OW-1 and OW-2 for six months in 1997. Fenton's reagent was injected into approximately 50 direct-push injection points in October 2000. Active remediation has not been conducted for the past 14 years. Since 1998, ten groundwater monitoring and two remediation wells have been installed and monitored; two wells have been abandoned. According to groundwater data, water quality objectives have been achieved or nearly achieved. An atypical chromatographic pattern for total petroleum hydrocarbons as diesel (TPHd) is reported. The reported detections may not be petroleum-related at all, but may indicate naturally occurring organic materials, possibly associated with the "bay-mud" deposits common in the vicinity of the site. Silica gel cleanup has been performed on all soil and groundwater samples collected and analyzed for TPHd since 2000.

The petroleum release is limited to the soil and shallow groundwater. According to data available in GeoTracker, there are no public water supply wells within 250 feet of the defined plume boundary. No other water supply wells have been identified within 250 feet of the defined plume boundary in the files reviewed. There is a salt water slough 275 feet northwest of the

Site and an Alameda County Flood Control Channel is located along the Site's western boundary. The unauthorized release is located in an area served by public water supply as defined in the Policy. The affected shallow groundwater is not currently being used as a source of drinking water, and it is highly unlikely that the affected groundwater will be used as a source of drinking water in the foreseeable future. Other designated beneficial uses of impacted groundwater are not threatened, and it is highly unlikely that they will be, considering these factors in the context of the site setting.

#### Rationale for Closure under the Policy

- General Criteria: The case meets all eight Policy general criteria.
- Groundwater Specific Criteria: Fails – The TPHd & TPHg plume is undefined in the southwestern portion of the Site.
- Vapor Intrusion to Indoor Air: This case meets Policy Criterion 2b. A site-specific risk assessment of potential exposure to petroleum constituents as a result of vapor intrusion [Stantec, July 2013] found that maximum concentrations of petroleum constituents remaining in soil and groundwater will have no significant risk of adversely affecting human health. In addition, the onsite building is an active repair facility with multiple rollup doors that would prevent the accumulation of soil vapors in the building. In addition, as an active repair facility, there would adequate air exchange provided by the building's ventilation system required to control vehicle exhaust generated during automotive repair.
- Direct Contact and Outdoor Air Exposure: The case meets Policy Criterion 3a. Maximum concentrations in soil are less than those in Policy Table 1 for Commercial/Industrial use, and the concentration limits for a Utility Worker are not exceeded. There are no soil sample results in the case record for naphthalene. However, the relative concentration of naphthalene in soil can be conservatively estimated using the published relative concentrations of naphthalene and benzene in gasoline. Taken from Potter and Simmons (1998), gasoline mixtures contain approximately 2 percent benzene and 0.25 percent naphthalene. Therefore, benzene can be used as a surrogate for naphthalene concentrations with a safety factor of eight. Benzene concentrations from the Site are below the naphthalene thresholds in Policy Table 1. Therefore, the estimated naphthalene concentrations meet the thresholds in Table 1 and the Policy criteria for direct contact by a factor of eight. It is highly unlikely that naphthalene concentrations in the soil, if any, exceed the threshold.

#### Recommendation

Based on the conclusions reached during a conference call held on November 5, 2014 between the County and State Water Board, it was agreed that additional grab groundwater samples are necessary to define the TPHg and TPHd plume in the southwestern portion of the Site.

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