



ENVIRONMENTAL HEALTH DEPARTMENT
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

June 3, 2016

Atlantic Richfield Company
(A BP Affiliated Company)
P.O. Box 1257
San Ramon, CA 94583
Attn: Paul Supple
(Sent via electronic mail to:
paul.supple@bp.com)

ConocoPhillips
76 Broadway
Sacramento, CA 95818
Attn: Ed Ralston
(Sent via electronic mail to:
Ed.C.Ralston@p66.com)

Rajinder S & Sukhvinder Sull
2004 Hartnell Street
Union City, CA 94587
(Sent via electronic mail to: rsunion76@aol.com)

Subject: Request for Addendum Work Plan, Fuel Leak Case No. RO0000014 and GeoTracker
Global ID T0600100213, BP #11132, 3201 35th Avenue, Oakland, CA 94619

Dear Responsible Parties:

Thank you for the recently submitted documents entitled *Well Installation and Well Replacement Report (WR)*, dated April 12, 2016, and *First Quarter 2016 Semi-Annual Groundwater Monitoring Report (GWM)*, dated April 27, 2016. Both reports were prepared by ARCADIS U.S., Inc. (Arcadis), for subject site. Alameda County Environmental Health (ACEH) staff has reviewed the case file including afore-mentioned documents in conjunction with the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP).

The WR documents the destruction of off-site monitoring well MW-10, the installation of MW-10 replacement well MW-10R, and installation of off-site well MW-11.

The GWM documents the sampling and analytical results of four on-site and five off-site wells, including the recently installed wells MW-10R and MW-11.

Technical Comments

1. As expressed in our Directive letter dated September 18, 2015, ACEH was of the opinion that installation of soil gas probe SV-1, as outlined in the *Work Plan- Additional Site Characterization (Work Plan)*, dated June 25, 2014 and prepared by Arcadis, was premature, pending the findings of contaminant concentrations in the replacement well MW-10R. The GWM documents the analytical results for the initial sampling of well MW-10R, which was reported to contain the concentration of total petroleum hydrocarbons as gasoline (TPHg) at 38,000 micrograms per liter ($\mu\text{g/L}$) and benzene, toluene, ethylbenzene, and xylenes (collectively BTEX) at 3,830, 2,810, 1,130, and 5,310 $\mu\text{g/L}$, respectively. Additionally, the concentration of tertiary butyl alcohol (TBA) was reported at 40.5 $\mu\text{g/L}$.

Based on these concentrations, ACEH is of the opinion that the soil gas investigation outlined in the Work Plan and ACEH's September 18, 2015 letter, is warranted. Sampling locations along 35th Avenue may include the residences (addressed as 3210, and 3214 35th Avenue) and the child care facility (at 3202 35th Avenue). Prior to performing the investigation, the foundations types and their depths, including the presence of basements, should be ascertained for determining the appropriate depth of sampling. ACEH requests the preparation and submittal of a figure depicting the proposed sample locations, accompanied by a cover letter documenting foundation types, the presence/absence of basements, and the proposed depth of sample collection for ACEH review and approval. Please submit the document as a work plan addendum by the date specified below.

ACEH requests the soil vapor investigation be performed in accordance with the July 2015 *Advisory- Active Soil Gas Investigations (Advisory)* prepared by California Environmental Protection Agency/ Department of Toxic Substances Control (Cal EPA / DTSC), and the Regional Water Quality Control Boards of the Los Angeles (LARWQCB) and San Francisco (SFRWQCB) regions.

Based on the difficulty permitting through the City of Oakland for the work performed for the WR, efforts should be made to perform the sampling within the properties being evaluated. The soil vapor sampling points should be located as close to structures as permissible. Additionally, in accordance with the Advisory, ACEH requests installation of permanent soil gas probes.

2. The Work Plan specifies that soil gas samples will be collected at depths of 5 and 10 feet based on the requirements of Appendix 4 of the LTCP. The LTCP specifies a sample collection depth of 5 feet below the depth of the foundation, or at 5 feet below the ground surface (bgs) for undeveloped sites. ACEH requests the LTCP sampling depth of 5 feet be followed for the soil gas investigation, with adjustments made based on the type of foundation of the adjacent structures.
3. The Work Plan specifies that the soil gas samples will be analyzed for benzene, ethyl benzene and naphthalene. While these three compounds are consistent with the LTCP, health risks associated with vapor intrusion to indoor air are not restricted to these three compounds. Therefore, ACEH requests a full scan TO-15 analysis be run. Additionally, one duplicate sample should be analyzed for naphthalene using the TO-17 analysis for verification of the TO-15 concentrations. ACEH concurs with the Work Plan that the soil gas sample analysis include oxygen and the tracer gas, identified as helium. Due to the elevated petroleum hydrocarbons reported in groundwater at MW-10R, ACEH requests the addition of methane and carbon dioxide to the analysis scope for a methanogenesis evaluation.
4. ACEH's review of the groundwater gradient data suggests the north arrow of site figures may not be properly oriented. Please review the orientation of the north arrow on the figures. If the north arrow is not properly aligned, ACEH requests a revision statement, a corrected rose diagram, and revised *Historical Groundwater Flow Direction and Gradient* table in future groundwater monitoring reports.
5. As stated above, groundwater at MW-10R includes 38,000 µg/L TPHg and 3,830 µg/L benzene. As MW-10R is an off-site downgradient well, ACEH requests a work plan for

additional contaminant plume definition down gradient of well MW-10R. Please provide the work plan by the date specified below.

6. The report entitled *First Quarter 2012 Monitoring Report*, dated April 13, 2012 and provided to ACEH by Arcadis, states the cumulative light non-aqueous phase petroleum hydrocarbons (LNAPL) recovered is 234.3 gallons of LNAPL/water mixture. Subsequent groundwater monitoring reports identify the 'cumulative liquid phase hydrocarbons recovered to date' as 'none'. LNAPL recovery has been performed at the site since free phase (FP) product was observed, with removal followed up with an interim FP removal system which began operation in November 1992. ACEH requests a review of LNAPL recovery data for the site and the cumulative total be expressed on the appropriate data sheet.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Keith Nowell), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **July 5, 2016 –Work Plan Addendum** (Figure Depicting Soil Gas Sampling Locations with Cover Letter (file name: RO0000014_WP_ADEND_R_YYYY-MM-DD))
- **July 29, 2016 – Second Quarter 2016 Quarterly Groundwater Monitoring Report** (file name: RO0000014_GWM_R_YYYY-MM-DD)
- **August 3, 2016 – Work Plan for Additional Contaminant Plume Definition** (file name: RO0000014_WP_R_YYYY-MM-DD)

Thank you for your cooperation. ACEH looks forward to working with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Respectfully,

Keith Nowell

Enclosure: Responsible Party(ies) Legal Requirements/Obligations
ACEH Electronic Report Upload (ftp) Instructions

cc: Megan Smoley, Arcadis U.S. Inc., 100 Montgomery Street, 7051 Fain Park Drive, Suite 119, Montgomery, AL 36117 (Sent via E-mail to: Megan.Smoley@arcadis-us.com)

Dilan Roe (Sent via electronic mail to: dilan.roe@acgov.org)

Keith Nowell, ACEH (Sent via electronic mail to: keith.nowell@acgov.org)

GeoTracker, File

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.