

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP) FOR
HAZARDOUS MATERIALS RELEASES
1131 HARBOR BAY
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

June 9, 2017

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 Information, Fuel Leak Case No. RO0000014 and GeoTracker Global ID T0600100213, BP #11132, 3201 35th Avenue, Oakland, CA 94619

Dear Responsible Parties:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the recently submitted documents entitled *Property Foundation Survey (PFS)* and *Fourth Quarter 2016 and First Quarter 2017 Groundwater Monitoring Report (GWMR)*. Both documents are dated April 24, 2017 and were prepared by Arcadis U.S. Inc. (Arcadis) for the subject site. The GWMR presents the most recent groundwater monitoring data, collected on March 1, 2017, documenting concentrations of 2,610 micrograms per liter ($\mu\text{g/L}$) benzene and 799 $\mu\text{g/L}$ ethyl benzene in groundwater recovered from off-site well MW-10R. Depth to water in well MW-10R was reported at 11.23 feet beneath the ground surface and is located in close proximity to a residence.

The results of the PFS indicate the residential structures surveyed do not have subterranean basements; however, two residences appear to have first floors that extend below grade up to 3- to 4- feet and one with a crawl space that extends approximately 2.5 feet below the ground surface.

ACDEH requests that you address the following technical comments and send us the technical reports described below.

TECHNICAL COMMENTS

1. Vapor Intrusion- Based on the elevated concentrations of benzene and ethyl benzene and the shallow depth to water, ACDEH is of the opinion that a risk of vapor intrusion to indoor air may exist. Therefore, ACDEH requests submittal of a work plan for the purpose of evaluating this risk. Please incorporate the findings of the PFS and comments made in our letter of June 3, 2016 into the work plan. Please submit the vapor intrusion assessment work plan by the date specified below.
2. Electronic Submittal of Information- A review of the groundwater data for the case suggests the contaminant plume may not be adequately defined. In part this may be due the lack of consistent reporting of groundwater flow direction. Due to the variable direction of the north arrow on site figures, information

conveyed on rose diagrams and groundwater flow direction tables may not reflect the direction of groundwater flow relative to site features. The California State Water Resources Control Board (SWRCB) required electronic submittal of information for LOP cases in September, 2001. Since the time the regulations took effect, more than 40 groundwater monitoring events have been performed for the site. However, only three figures (GEO_MAPs) have been uploaded that depict the groundwater flow direction. ACDEH requests an update of the GeoTracker database to include the figures depicting groundwater flow, the groundwater contour maps, as GEO_MAPs. Please submit a list to ACDEH via electronic mail, Attention: Keith Nowell, of the uploaded GEO_MAPs by the date specified below. Additionally, ACDEH requests a footnote with future rose diagrams and historical groundwater flow direction tables noting if they have been updated to reflect changes to the north arrow.

3. Groundwater Evaluation Report- As indicated above, the groundwater gradient at the site appears highly variable. Please evaluate the changes in flow direction and present your findings and recommendations in a groundwater evaluation report. ACDEH requests the evaluation include a discussion of the correlation of flow direction with depth to water, time of year and other considerations when updating the groundwater section of the site conceptual model. Please include recommendations to address data gaps that may be identified in the evaluation and submit the groundwater evaluation report by the date specified below.

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 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/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the SWRCB's GeoTracker website."

Please make this change to your submittals to ACDEH.

TECHNICAL REPORT REQUEST

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

- **June 30, 2017 – Electronic Submittal of Information-** Groundwater Contour Map (GEO_MAP) submittals; Provide list of the uploaded maps to ACDEH via electronic mail, Attention: Keith Nowell
- **July 24, 2017 – Work Plan for Vapor Intrusion Evaluation** (file name: RO0000014_WP_R_yyyy-mm-dd)
- **August 8, 2017 – Groundwater Evaluation Report** (file name: RO0000014_MISC_R_yyyy-mm-dd)

Thank you for your cooperation. ACDEH 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

Responsible Parties
RO0000014
June 9, 2017, Page 3

Sincerely,

Keith Nowell, PG, CHG
Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements/Obligations and
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 electronic mail to: Megan.Smoley@arcadis-us.com*)

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

Paresh Khatri, ACDEH, (*Sent via electronic mail to: paresh.khatri@acgov.org*)

Keith Nowell, ACDEH (*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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) 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 File Transfer Protocol (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 SCP 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 (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/) for more information on these requirements.

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 ACDEH's FTP server and the SWRCB's GeoTracker website." 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 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. 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 case meet this requirement. 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

Please note that delays in investigation, late 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 SCP)	REVISION DATE: December 1, 2016
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions


The Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) 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 acknowledgement 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) Open File Explorer using the Windows  key + E keyboard shortcut.
 - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) On the address bar, type in ftp://alcoftp1.acgov.org.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
 - d) Click Log On.
 - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - f) 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.