

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

August 21, 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: Conditional Work Plan Approval, 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 recent electronic submittals to the State Water Resources Control Board (SWRCB) GeoTracker website. Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the recently submitted document entitled *Offsite Soil Vapor and Groundwater Investigation Work Plan* (Work Plan) dated July 21, 2017 and prepared by Arcadis U.S., Inc. (Arcadis) for the subject site. The Work Plan was prepared at the request of ACDEH in our letter dated June 3, 2016.

The Work Plan presents the findings of a groundwater data review and proposes the installation of two off-site clustered soil vapor probes and two off-site groundwater monitoring wells. Based on the groundwater data evaluation, Arcadis determined that groundwater flow shifts eastward during periods of high groundwater, typically occurring during the first quarter groundwater monitoring events. The proposed soil vapor wells, locations of which are depicted on Figure 2 and located across 35th Avenue, will provide data to aid in the evaluation of potential vapor intrusion risk to the nearby residences. Two depths are proposed at each probe location based on the findings of a foundation study. Two off-site groundwater monitoring wells, locations of which are depicted on Figure 9, are proposed to aid in the delineation of the leading edge of the contaminant plume.

Based on ACDEH staff review of the referenced document and of the case file, we generally concur with the recently proposed scope of work provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. While the comments below request a revised figure and additionally requested items, submittal of a revised Work Plan is limited to a revised figure and additionally requested items, unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed. We request that you address the following technical comments, submit the requested document, and upon ACDEH approval, perform the proposed work, and send us the technical reports requested below. Please provide 72-hour advance written notification to this office (electronic mail preferred to: keith.nowell@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. Vapor Intrusion Along 35th Avenue – As indicated in our letter dated June 3, 2016, ACDEH is in is of the opinion that data from three soil vapor probe locations may be more adequate for the soil vapor intrusion evaluation along 35th Avenue. In order to more adequately cover the plume relative to the contaminant source area associated with the underground storage tank (UST) pit, ACDEH requests the locations of the

soil vapor probes be approximately centered in front of the residential lots along 35th Avenue. Please provide the revised locations of these wells in the revised figure requested below.

Alternatively, please indicate how the locations proposed in the Work Plan will adequately define the potential vapor intrusion risk.

2. Vapor Intrusion along Suter Street - As documented in the Groundwater Evaluation section of the Work Plan and in the groundwater monitoring reports for the subject case, the groundwater flow direction at the site appears to be highly variable. Groundwater monitoring wells MW-8 and MW-9, historic free product wells, continue to demonstrate elevated Total Petroleum Hydrocarbons (TPH) concentrations. Though it appears that the benzene, toluene, ethylbenzene, and xylenes (collectively BTEX) concentrations may have significantly attenuated, it is our opinion the threat of vapor intrusion to residences in the vicinity of these wells should be evaluated. Therefore, in addition to those proposed for 35th Avenue, ACDEH requests placement of vapor intrusion probes along Suter St., including the residence located at 3125 35th Ave. Please provide the proposed locations and depths of these wells in the revised figure requested below. Please include the type of foundation and the presence/ absence of basement(s) along with your figure.
3. Vapor Probe Soil Sampling – The SWRCB Low Threat Underground Storage Tank Case Closure Policy (LTCP) describes conditions, including bioattenuation zones, which if met will assure that exposure to petroleum vapors in indoor air will not pose unacceptable health risks to human occupants of existing or future site buildings, and adjacent parcels. Appendices 1 through 4 of the LTCP criteria illustrate four potential exposure scenarios and describe characteristics and criteria associated with each scenario. Most of the exposure scenarios require knowledge of TPH concentrations in the vadose zone. In the Work Plan, Arcadis states soil samples will be recovered from the 9-foot boring at depths of approximately 2, 5, and 9 feet.

The LTCP petroleum vapor in indoor air criteria are based on the vadose zone thicknesses of 5, 10 or 30 feet as measured from the base of the foundation. For residential structures having slab-on-grade construction, the foundation thickness is typically 6-inches. Residential structures having perimeter footing construction typically have an embedment depth of 1-foot, as measured from the base of the crawl space beneath the structure. ACDEH requests the proposed soil vapor probe depths be adjusted accordingly to meet the 5-foot and/or 10-foot thicknesses for the criteria being evaluated.

Please note that in order to evaluate Scenario 4 (2 of 2) of the LTCP, soil concentrations of TPH are measured at two depths within the five-foot zone.

4. Groundwater Monitoring Well Locations –
 - a. **Mangels Avenue** – The proposed location of groundwater monitoring well MW-12 appears to be located on a line defined through the UST pit and through well MW-10R, a well reported to contain concentrations of TPH indicative of free product. The location appears appropriate to define the leading edge of the contaminant plume in this direction. However, should the proposed location require adjustment based on site conditions, ACDEH requests an attempt to relocate its position to the northwest no more than a few tens of feet along Mangels Avenue rather than to the southeast and away from the site.
 - b. **Suter Street** – The proposed location of well MW-13 is in close proximity, and to the south, of the line defined through the UST pit and through well MW-11. ACDEH requests the location of MW-13 be repositioned to the other side of Suter Street to aid in defining the plume that may be potentially passing between wells MW-10R and MW-11. Please provide the revised location of the well in the revised figure requested below.

5. Monitoring Well Soil Sampling –

ACDEH recommends that soil samples should be collected and analyzed at intervals of no more than five feet, areas of obvious contamination, the soil/groundwater interface, and at significant changes in lithology. If staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number of soil samples from this interval should be submitted for laboratory analyses to characterize the fuel hydrocarbon concentrations within this interval.

TECHNICAL REPORT REQUEST

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

- **August 28, 2017 – Revised Figure with Comments-** to ACDEH via electronic mail, Attention: Keith Nowell
- **To Be Determined – Vapor Intrusion Evaluation** (file name: RO0000014_SWI_R_YYYY-mm-dd)
- **To Be Determined – Groundwater Monitoring Well Installation Report** (file name: RO0000014_GWM_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

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.