



ENVIRONMENTAL HEALTH DEPARTMENT
ENVIRONMENTAL PROTECTION
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October 5, 2011

Crane Works CX
2585 Nicholson Street
San Leandro, CA 94577-4261

Mr. Steven Birch
Rodding Cleaning Services
Unknown Address

Mr. Robert Eckstein
Sketchley Trust
Unknown Address

Mr. Fred Schifferle
Manager Sketchley Trust
Vice President
Bank of America, N. A.
2000 Clayton Road, Building D
Concord, CA 94520-2425
(sent via electronic mail to
Frederick.A.Schifferle@bankofamerica.com)

Mr. Randy Muller
Environmental Services Manager
Bank of America
2650 Ashbourne Drive
Lawrenceville, GA 30043
(sent via electronic mail to
randy.muller@bankofamerica.com)

Subject: Request for Work Plan Addendum; Fuel Leak Case No. RO00000020 (Global ID# T0600101153), Rodding Cleaning Services, 2585 Nicholson Street, San Leandro, CA 94577

Dear Messrs. Schifferle, Muller, Birch, and Eckstein:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Groundwater Monitoring Report December 2010*, dated January 24, 2011 (received August 18, 2011), the *Groundwater Monitoring Report June 2011*, dated July 27, 2011 (received August 22, 2011), and the *Work Plan for Sub-slab Vapor Sampling and Source Area Subsurface Investigation*, dated July 6, 2011 (received July 28, 2011). The documents were prepared and submitted on your behalf by Versar, Inc. Thank you for submitting the reports.

Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below.

TECHNICAL COMMENTS

1. **Request for Sub-Slab Vapor Survey Work Plan Addendum** – Five sub-slab vapor well points are proposed for the concrete slab centered between two buildings, one onsite building occupied by Crane Works Inc. on the north and a second offsite building, recently occupied by a print shop. A number of areas of concern in regards to the proposed methodology contained in the work plan were noted and are discussed further below.
 - a. **Soil Vapor Well Locations** – Because vapor intrusion is primarily an indoor air quality concern, and because of the apparent limited funds currently available, ACEH requires that the well points be relocated to the slabs directly beneath both buildings. This will directly address vapor intrusion (VI) concerns to occupants of both buildings and will account for the generally dryer soil beneath building envelopes (affecting VI barriers). At present utility conduits interior to the buildings and to the site as a whole have not been located on site plans. Utilities and utility laterals can affect the distribution of sub-slab vapor and need to be incorporated into the considered location of proposed vapor point sample locations, as previously requested.
 - b. **Vapor Probe Construction** – The work plan discusses the construction details of the permanent sub-slab vapor probes; however, does not specify the use of a filter pack around

the vapor tip. Because a rotohammer will be used to drill the probe hole the generation of a concrete dust can be a concern. As a consequence ACEH requests the use of a sand pack to minimize problems with fine particulates.

- c. **Tracer and Tracer Shroud** - The sampling protocols do not reference use of a tracer or of a tracer shroud (ACEH notes that a tracer was used during a pervious soil vapor sampling event; however, the use of a shroud is not clear). As discussed more fully in the 2010 DTSC *Advisory – Active Soil Gas Investigation*, dated March 2010, use of a tracer and a tracer shroud are appropriate at the site. This can be in addition to the O-ring referenced in the *Vapor Intrusion Monitoring Sub-Slab Sampling System* cut sheet in the work plan.

In order for a tracer to reach equilibrium in proximity to the vapor probe, ACEH requests that the shroud remain in place for the duration of the test to maintain that atmosphere. To allow “real-time” monitoring of the shroud tracer atmosphere (that stable tracer concentrations are present) with a monitoring device (a Photoionization Detector), the shroud should be fitted with a minimum of one port. The port can additionally be used to access the sampling train without removal of the shroud if a gas impermeable (e. g. plastic) curtain is used. Please tabulate the shroud tracer concentrations (e. g. PID detections) in the report requested below if the tracer concentration readings are not contained in the field data sheets.

- d. **Additional Soil Vapor Analytical Suite** – To better understand the sub-slab vapor environment please additionally analyze for atmospheric gases (nitrogen and oxygen), as well as methane, CO₂, and the tracer gas by appropriate methodologies. To preclude miscommunication, and because it was not listed in the vapor analytical suite, vapor analysis for TPHg is also requested to be incorporated into the analytical suite.

ACEH requests an addendum to the Sub-Slab Vapor Survey Work Plan to address these concerns. Please submit the addendum by the date identified below.

2. **Collection and Analysis of Soil Samples** – ACEH generally concurs with the selected analytical suite outlined for soil and groundwater samples contained in the work plan; however, ACEH requires that soil samples be collected and submitted for laboratory analysis in all soil bores at any interval where staining, odor, or elevated PID readings occur, and at sufficient depth below the deepest indication of such in order to define the vertical extent in soil. If no staining, odor, or elevated PID readings are observed, a soil sample is to be collected from each boring at the capillary fringe, where groundwater is first encountered, and at depth in order to adequately define the vertical extent in soil.
3. **Groundwater Monitoring Well Repair** – Both groundwater monitoring reports referenced above note that well MW-5 no longer has a well plug, nor a box lid, and that the well casing may be damaged thereby giving erroneous depth to groundwater measurements. ACEH requests the inspection and repair of this well. This will prevent unauthorized access to the well, thus giving a level of self-protection to Responsible Parties. This also will eliminate the potential for surface water runoff from entering the well, thereby raising the question of the reliability of all analytical data from this down to cross-gradient well. Due to the age of the wells, ACEH also requests the inspection of all groundwater monitoring wells for integrity, and repair if necessary, and potential redevelopment. At the current time, existing well purge logs appear to indicate wells MW-4 and MW-5 have thicker sediment accumulation than other wells. Please submit the findings of this inspection with the work plan addendum, by the date specified below.
4. **Electronic Report and Data Upload Compliance** – A review of the case file and the State's Geotracker database indicates that the site is not in compliance with previous directive letters. Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs, including SLIC programs. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites was required in GeoTracker. At present missing data and

documents include, but may not be limited to, pre-2008 EDF submittals, pre-2008 GEO_WELL data, GEO_MAPS, well survey data to Geotracker standards, and all bore logs. Please upload all submittals to GeoTracker as well as to ACEH's ftp server by the date specified below. ACEH additionally requests the submittal of confirmation of the electronic upload of these documents. Electronic reporting is additionally described below in Attachment 1.

- 5. ACEH Website Submittal Requirements** – As discussed in a previous directive letter it was noticed that electronic reports have not been submitted to the ACEH web database. ACEH no longer accepts paper copies of reports and correspondence. This is discussed further in Attachment 1 (*Responsible Party(ies) Legal Requirements / Obligations*) below. Please review the ACEH website for reports that have not been submitted and submit electronic copies, including a perjury statement from the responsible party. These documents include, but are not limited to, the *Work Plan to Conduct Soil Vapor Assessment*, dated July 21, 2009, and *Groundwater Monitoring Report November 2009*, dated December 24, 2009. Please upload all older reports to ACEH's ftp server by the date specified below.

TECHNICAL REPORT REQUEST

Please submit the following deliverables and technical reports to ACEH (Attention: Mark Detterman), according to the following schedule:

- **November 18, 2010 – Submittal of Electronic Reports to Geotracker and ACEH ftp Website with copy of upload confirmation**
- **November 18, 2011 – Soil Vapor Work Plan Addendum and Well Inspection Recommendations**
- **60 Days After Approval of Work Plan Addendum – Soil & Groundwater Investigation Report**
- **January 27, 2012 – Semi-Annual Groundwater Monitoring Report**
- **90 Days After Submittal of Site Investigation Report – Interim Remedial Action Plan**

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.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations
Electronic Report Upload (ftp) Instructions

cc: Tim Berger, Versar, Inc., 7844 Madison Avenue, Suite 167, Fair Oaks, CA 95628
(sent via electronic mail to TBerger@versar.com)
David Trotter, Bowles & Verna LLP, 2121 N. California Blvd, Suite 875, Walnut Creek, CA 94596
(sent via electronic mail to dtrotter@bowlesverna.com)

Donna Drogos, ACEH, (sent via electronic mail to donna.drogos@acgov.org)
Mark Detterman, ACEH, (sent via electronic mail to mark.detterman@acgov.org)
Geotracker, Electronic 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.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml).

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: July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 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 dehloptoxic@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 dehloptoxic@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.