



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

July 7, 2015

City of Emeryville  
Successor to Emeryville Redevelopment Agency  
c/o Nancy Humphrey  
1333 Park Ave.  
Emeryville, CA 94608  
(sent via electronic mail to: [nhumphrey@ci.emeryville.ca.us](mailto:nhumphrey@ci.emeryville.ca.us))

Subject: Modified Work Plan Approval; Fuel Leak Case No. RO0000061 and GeoTracker Global ID T0600101925, City of Emeryville Fire Station #2, 6303 Hollis Street, Emeryville, CA 94608

Dear Ms. Humphrey:

Alameda County Environmental Health (ACEH) has reviewed the case file, including the *Data Gap Investigation Work Plan*, dated May 15, 2015. The report was prepared and submitted on your behalf by OTG EnviroEngineering Solutions, Inc (OTG). Thank you for submitting the work plan.

Based on ACEH staff review of the work plan the proposed scope of work is conditionally approved for implementation *provided that the technical comments below are incorporated* during the proposed field investigation. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or technical comments below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org)) prior to the start of field activities.

### **TECHNICAL COMMENTS**

1. **Conditional Work Plan Addendum Approval** – The referenced work plan proposes a series of actions and ACEH is in general agreement; however, ACEH requests several modifications to the approach, as discussed below. Please submit a report by the date identified below.
  - a. **Soil Sample Selection Protocols** – The work plan proposes to collect and retain for laboratory analysis soil samples at approximately 5 and 10 feet below surface grade (bgs). ACEH requests that soil samples be collected in the 0 to 5 and the 5 to 10 foot intervals, consistent with the Low Threat Closure Policy (LTCP), based on discolored soil, photoionization detections, at other signs of contamination, and at significant lithologic changes. This may require more than two soil samples per soil bore.
  - b. **Soil and Groundwater Analysis** – The referenced work plan proposes to submit soil and grab groundwater samples for Total Petroleum Hydrocarbons (TPH) as gasoline (TPHg), TPH as diesel (TPHd), benzene, toluene, ethylbenzene, and total xylenes (BTEX), and methyl tert butyl ether (MTBE). To remain consistent with the LTCP, please additionally analyze soil and groundwater for naphthalene by appropriate EPA methodology.
  - c. **Request for Additional Soil Bore** – Due to historic concentrations at soil bore SB-7 suggestive of Free Phase hydrocarbons in groundwater and a previously identified southwestern groundwater flow direction (placing SB-7 downgradient of the former underground storage tank location), it appears appropriate to request the installation of one additional soil bore in close proximity to the location of soil bore SB-7. With the collection of soil and a grab groundwater

samples and subsequent analysis, as proposed and modified above, the data is expected to provide multiple lines of evidence to determine the presence of any residual free phase, the extent of hydrocarbon degradation since the original data was collected in June 1995, and may allow an evaluation of the risk of vapor intrusion to the fire station building.

- d. Well Survey – The referenced work plan proposes to conduct a well and surface water survey within ½ mile of the subject site. Because of differing data bases, please ensure both the Department of Water Resources (DWR) and Alameda County Public Works Agency (ACPWA) databases are utilized. Within the context of the LTCP, a ¼ mile survey appears appropriate at the site.
- e. **Groundwater Monitoring Well Redevelopment** – Because the existing well has not been sampled since April 2010, please evaluate the need to redevelop the well prior to sampling. Redevelopment may reduce the affect of suspended sediment on the resulting groundwater analytical concentrations.

### **TECHNICAL REPORT REQUEST**

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

- **September 18, 2015** – Site Investigation Report (and Groundwater Monitoring Report)  
File to be named: RO61\_SWI\_R\_YYYY-mm-dd
- **January 15, 2016** – Fourth Quarter 2015 Groundwater Monitoring Report  
File to be named: RO61\_GWM\_WP\_R\_YYYY-mm-dd
- **April 15, 2016** – First Quarter 2016 Groundwater Monitoring Report  
File to be named: RO61\_GWM\_WP\_R\_YYYY-mm-dd
- **July 15, 2016** – Second Quarter 2016 Groundwater Monitoring Report  
File to be named: RO61\_GWM\_WP\_R\_YYYY-mm-dd

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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

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

Sincerely,

Mark Detterman, PG, CEG  
Senior Hazardous Materials Specialist

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

cc: Xinggang Tong, OTG EnviroEngineering, Solutions, Inc, 770 Edgewater Drive, Suite 260, Oakland, CA 94621 (sent via email to: [xtong.otg@gmail.com](mailto:xtong.otg@gmail.com))  
Dilan Roe, ACEH (sent via email to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))  
Mark Detterman (sent via electronic mail to [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))  
Geotracker, Electronic Files

## 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/](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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> May 15, 2014
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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](mailto: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](mailto: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.