



May 17, 2017

City of Emeryville  
Successor to Emeryville Redevelopment Agency  
c/o Ms. 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: Conditional Approval of Work Plan; 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 (ACDEH) has reviewed the case file, including the *Phase II Data Gap Investigation Work Plan*, dated March 24, 2017. The report was prepared and submitted on your behalf by OTG EnviroEngineering Solutions, Inc (OTG). Thank you for submitting the report.

As discussed in a December 19, 2016 meeting, the work plan recommended the installation of four groundwater monitoring wells, two soil vapor wells, and conducting a vicinity well and water surface body search, in an effort to determine if the site meets the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP).

Based on ACDEH 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 Approval** – The referenced work plan proposes a series of actions and ACDEH is in general agreement; however, ACDEH requests several modifications to the approach, as discussed below. Please submit a report by the date identified below.

a. **Well Screen Interval** – The referenced work plan proposes a 17 foot long well screen interval between 3 and 20 feet below grade surface (bgs) based on previous groundwater at a depth of three feet bgs. In order to eliminate vertical flow between different granular strata within a well, ACDEH prefers a maximum 10 foot screen interval; however, will accept slightly longer screen intervals up to 14 to 15 feet based on the local hydrogeologic conditions.

b. **Soil Sampling** – No additional soil samples have been proposed for wells EW-1 and EW-2 due to their proximity to soil bores SB-17 and SB-19. Provided the wells are within 5 feet of the bores this may be acceptable; however, if there are changes in lithology or contaminant distribution within the well bores in comparison to the earlier soil bores, additional samples are requested at the location of the changed conditions. Please be mindful that for the LTCP, this is particularly important for soil in the 0 to 5 and 5 to 10 foot depth intervals.

- c. **Well and Surface Water Body Survey** – The work plan proposed to use a ¼-mile radius of search for these items. Please expand the search radius to 2,000 feet. This anticipated to provide an additional level surety at closure should delineation of the groundwater plume be problematic.
- d. **Soil Vapor Well Construction** – The referenced work plan proposed the installation of two five foot deep soil vapor wells. To remain consistent with LTCP guidance, the vapor wells should be installed to a depth of five feet below the foundation of the adjacent building. If it is slab on grade, this should be approximately 6.5 feet bgs, but should be based on a site specific foundation review. Conversely, ACDEH recognizes that a shallow groundwater elevation may preclude the ability to install the wells to this depth. Therefore, please be cognizant of both concerns at the time of the installation of the vapor wells.
- e. **Soil Vapor Analysis** – The work plan proposed analysis by TO-15 for Total Petroleum Hydrocarbons as gasoline (TPHg), benzene, toluene, ethylbenzene, total xylenes (BTEX), and naphthalene. To remain consistent with Department of Toxic Substances Control (DTSC) guidance relative to preferential naphthalene adhesion to plastic tubing commonly used in vapor well constructions, please additionally analyze naphthalene by TO-17.

Also remaining consistent with DTSC guidance, ACDEH requests each vapor sample be analyzed for oxygen, carbon dioxide, and the tracer used at the site (see next comment). Each compound provides very useful data.

- f. **Vapor Sampling Shroud and Tracer** – Remaining consistent with DTSC guidance, ACDEH requests the use of a vapor sampling shroud, the use of a tracer in the shroud, and the analysis for the tracer in each vapor sample, as well as from the shroud. In the event of the detection of the tracer in the vapor sample, the analysis of the shroud tracer concentration will determine if the sample remains acceptable within DTSC guidelines (less than 5% leak rate).
2. **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. Compliance is a State requirement, is tied to reimbursement, and non-compliance will delay closure. 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, older reports, older EDF submittals, current EDF submittals, GEO MAPS, GEO WELL data, and all bore logs.** Please see Attachment 1 for limited additional details, and the state GeoTracker website for full details. ACDEH requests notification of, and a list of, the documents uploaded to Geotracker. Please upload all submittals to GeoTracker as well as to ACDEH's ftp website by the date specified below.

### **SUBMITTAL ACKNOWLEDGEMENT STATEMENT**

Please note that ACDEH has updated 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: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

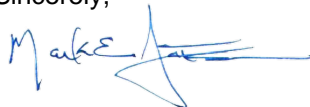
- **July 28, 2017** – Site Investigation and Groundwater Monitoring  
File to be named: RO61\_SWI\_R\_yyyy-mm-dd
- **December 15, 2017** – Quarterly Groundwater Monitoring  
File to be named: RO61\_GWM\_R\_yyyy-mm-dd

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 ACDEH Electronic Report Upload (ftp) Instructions

cc: Xinggang Tong, OTG EnviroEngineering, Solutions, Inc, 770 Edgewater Drive, Suite 260, Oakland, CA 94621 (Sent via electronic mail to: [xtong.otg@gmail.com](mailto:xtong.otg@gmail.com))

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

Paresh Khatri, ACDEH; (Sent via electronic mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org))

Mark Detterman, ACDEH, (Sent via electronic mail to: [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))

Electronic File, GeoTracker

## 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/](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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> December 1, 2016
	<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; May 15, 2014, November 29, 2016
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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 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) 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](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.