



April 16, 2018

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: Request for 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 Report*, dated February 27, 2018. The report was prepared and submitted on your behalf by OTG EnviroEngineering Solutions, Inc (OTG). Thank you for submitting the report.

The report documents the installation of wells EW-1 to EW-4, the destruction of compromised well MW-1, the installation of two permanent soil vapor wells SV-1 and SV-2 to a depth of approximately 6 feet below grade surface (bgs), and the collection of soil and groundwater samples. Soil vapor samples could not be collected due to the presence of substantial groundwater in the two vapor wells. The *Phase II Data Gap Investigation Work Plan*, dated March 24, 2017, proposed to conduct a site vicinity well and surface water body survey; however, these tasks were not included in the investigation report.

Based on the review of the case file ACDEH requests that you address the following technical comments and send us the documents requested below.

### **TECHNICAL COMMENTS**

- 1. Quarterly Groundwater Monitoring** – The referenced report proposes to place the subject site into a quarterly groundwater monitoring program. ACDEH is in agreement with the recommendation. To be consistent with the November sampling date, please sample in the months of February, May, August, and November of the year. Analysis should include all Chemicals of Concern, including Total Petroleum Hydrocarbons (TPH) as gasoline (TPHg), TPH as diesel (TPHd), benzene, toluene, ethylbenzene, total xylenes, methyl tert butyl ether (MTBE), and naphthalene.
- 2. Request for Work Plan** – As reported, the soil vapor wells were unsuccessful in determining the threat of vapor intrusion to the existing building at the site due to the presence of groundwater in the wells. While the Low Threat Closure Policy (LTCP) allows a risk of vapor intrusion determination without the collection of vapor samples, the Policy does not accept hydrocarbon concentrations greater than 100 milligrams per kilogram (mg/kg) in the 0 to 5 depth interval at sites with very shallow groundwater conditions (groundwater at the site is as shallow as 3.53 feet below grade surface, or bgs). Recently collected analytical data indicates that the 0 to 5 foot depth interval contains TPHg and TPHd hydrocarbon concentrations up to 490 mg/kg TPH and 120 mg/kg TPHd within this interval. As a consequence the site does not meet the Vapor Intrusion Criteria of the LTCP.

Therefore in order determine the risk of vapor intrusion to the building, ACDEH requests a work plan, with all appropriate protocols to be utilized, for the installation of permanent sub-slab vapor points within the footprint of the building, by the date identified below.

3. **Well and Surface Water Body Survey** – The March 2017 work plan proposed to conduct a ¼-mile radius well survey. The May 17, 2017 directive letter that provided conditional approval, requested that the radius be expanded slightly to a search radius of 2,000 feet, in order for the survey to be in general conformance with the LTCP. ACDEH also reaffirms the previous request to identify the closest surface water body in conformance with the LTCP. Please submit these surveys by the date identified below.
4. **Preferential Pathway Survey** – The referenced site investigation report acknowledged that hydrocarbon concentrations in groundwater are highest in the vicinity of EW-2, and indicated that a preferential pathway could account for the atypical distribution of hydrocarbon contamination from the former gasoline underground storage tank (UST) tank location (cross gradient to the southeast of the release). However, in ACDEHs review of site soil analytical data, existing soil data clearly delineates two soil hydrocarbon contaminant plumes separated by low to non-detectable concentrations in soil, one southwest of the former gasoline UST, and one proximal to EW-2, SB-17, SB-18, and SV-2. The presence of another source, or UST, may also account for this distribution. Therefore, to understand the role of utility preferential pathways to affect contaminant migration, ACDEH requests the generation of a utility corridor preferential pathway survey at the site, inclusive of location and depth of all utilities. Should overhead utilities be present, ACDEH requests that their location also be documented as a method to account for all utilities at the site.
5. **Electronic Report and Data Upload Compliance** – Thank you for uploading recent site investigation reports, GEO\_WELL data, bore logs and site maps to Geotracker. In order to complete the historic record for the site and move the case a step closer to closure, ACDEH requests that historic reports, bore logs, and maps be additionally uploaded to Geotracker by the date specified below. Copies of these documents can be obtained from the ACDEH web database.

#### **TECHNICAL REPORT REQUEST**

Please submit the following technical reports and deliverables to the State Water Board's Geotracker website and notify your case worker by electronic mail ([mark.detterman@acgov.org](mailto:mark.detterman@acgov.org)), in accordance with the following specified file naming convention and schedule, as provided below, and in the Responsible Party(ies) Legal Requirements/Obligations which is included as Attachment 1. Please note ACDEH no longer accepts reports on the ftp site.

- **May 4, 2018** – Quarterly Groundwater Monitoring  
File to be named: RO61\_GWM\_R\_YYYY-MM-DD
- **June 15, 2018** – Work Plan, Water Well and Surface Water Body Survey, Preferential Pathway Survey, and Geotracker Upload Completion; File to be named: RO61\_COND\_WELL\_R\_YYYY-MM-DD
- **July 27, 2018** – Quarterly Groundwater Monitoring  
File to be named: RO61\_GWM\_R\_YYYY-MM-DD
- **November 2, 2018** – Quarterly Groundwater Monitoring  
File to be named: RO61\_GWM\_R\_YYYY-MM-DD

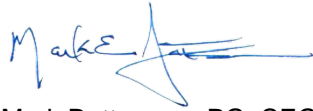
These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

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

Ms. Nancy Humphrey  
RO0000061  
April 16, 2018, Page 3

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

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> December 14, 2017
	<b>ISSUE DATE:</b> July 25, 2012
	<b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016
<b>SECTION:</b> ACDEH Procedures	<b>SUBJECT:</b> Responsible Party(ies) Legal Requirements / Obligations

**REPORT & DELIVERABLE REQUESTS**

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

**ELECTRONIC SUBMITTAL OF REPORTS**

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO\_MAP, GEO\_XY, GEO\_Z, GEO\_BORE, GEO\_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/))

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

**GEOTRACKER UPLOAD CERTIFICATION**

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values<sup>1</sup> as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

**GeoTracker Upload Table Example**

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
<b>2016 Subsurface Investigation Report</b>	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
<b>2012 Site Assessment Work Plan</b>	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>2010 GW Investigation Report</b>	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

<sup>1</sup> GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> NA
	<b>ISSUE DATE:</b> December 14, 2017
	<b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016
<b>SECTION:</b> ACDEH Procedures	<b>SUBJECT:</b> Responsible Party(ies) Legal Requirements / Obligations

**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 the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

**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 and include the professional registration stamp, signature, and statement of professional certification. 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**

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: [https://www.waterboards.ca.gov/water\\_issues/programs/ustcf/](https://www.waterboards.ca.gov/water_issues/programs/ustcf/)

**AGENCY OVERSIGHT**

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.