



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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April 13, 2010

Ms. June Weirich
Greyhound Lines, Inc.
350 N Saint Paul St., Mail Stop 0084
Dallas, TX 75201-4240

Subject: Revised Subsurface Investigation Work Plan & Site Conceptual Model for Fuel Leak Case No. RO0000074 and Geotracker Global ID T0600100666, Oakland Bus Terminal, 2103 San Pablo Avenue, Oakland, CA 94608

Dear Ms. Weirich:

Thank you for the recently submitted document entitled, "Site Investigation Workplan," dated November 11, 2008, and the "Site Conceptual Model," dated August 12, 2009, which were both prepared by Green Star Environmental (Green Star) for the subject site. Alameda County Environmental Health (ACEH) staff has reviewed the case file including the above-mentioned work plan and site conceptual model (SCM) for the above-referenced site. The scope of work presented in the above-mentioned work plan appears adequate to confirm current concentrations of residual soil impact at the site. However, selection of cleanup goals and evaluation of potential contaminant volatilization from soil and groundwater to indoor air exposure pathway has not been adequately justified and/or evaluated in either the above-mentioned work plan or SCM.

Since the scope of work presented in the work plan does not fully address ACEH's concerns and has not been adequately justified, the work plan cannot be approved at this time. ACEH requests that you address the following technical comments and send us a revised work plan and SCM as requested below.

TECHNICAL COMMENTS

1. **Regional Geologic and Hydrogeologic Setting** – Green Star has compared site contaminant concentrations to the City of Oakland Guidance Tier 2 SSTLs and has adopted those risk-based screening levels as site cleanup goals. *Although the concentrations of select contaminants are above Oakland's SSTLs, the concentrations are significantly above the Regional Water Quality Control Board's (RWQCB) Environmental Screening Levels.* Since ACEH's Local Oversight Program (LOP) functions under the RWQCB's guidance and the LOP oversees remediation cases throughout the County, including in the City of Oakland, comparison of site concentrations must be made to the RWQCB ESLs in absence of calculated site-specific remediation goals. Therefore, please revise the cleanup goals accordingly and submit revised SCM/work plan due by the date specified below.

2. **Potential Contaminant Volatilization to Indoor Air Pathway** – In Section 4.3 of the SCM, Green Star stated that a “vapor study of subsurface conduits at the Site, mainly near the impacted area, was conducted in April 2009.” Green Star further states that “the atmosphere inside the conduits was screened for VOCs using a photoionization detector (PID).” The method utilized does not appear to be consistent with methods described in the Department of Toxic Substances Control’s (DTSC) Active Soil Gas Investigations Advisory¹ to evaluate potential vapor migration/intrusion. Since groundwater sample analytical results have detected concentrations of TPH-g, benzene, and naphthalene as high as 12,000 micrograms per liter ($\mu\text{g/L}$), 730 $\mu\text{g/L}$, 160 $\mu\text{g/L}$, respectively, during the most recent groundwater sampling event conducted in October 2009, potential contaminant volatilization to indoor air exposure pathway evaluation appears warranted. Please propose a scope to address the ACEH’s comments and submit a revised work plan/SCM due by the date specified below.

NOTIFICATION OF FIELDWORK ACTIVITIES

Please schedule and complete the fieldwork activities by the date specified below and provide ACEH with at least three (3) business days notification prior to conducting the fieldwork, which includes routine groundwater sampling.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Paresh Khatri), according to the following schedule:

- **June 14, 2010** – Revised Soil and Water Investigation Work Plan & Revised SCM
- **Due within 30 Days of Sampling** – Semi-annual Monitoring Report (2nd Quarter 2010)
- **Due within 30 Days of Sampling** – Semi-annual Monitoring Report (4th Quarter 2010)

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 777-2478 or send me an electronic mail message at paresh.khatri@acgov.org.

Sincerely,

Paresh C. Khatri
Hazardous Materials Specialist

Enclosure: Responsible Party(ies) Legal Requirements/Obligations
ACEH Electronic Report Upload (ftp) Instructions

¹ Advisory – Active Soil Gas Investigations, Department of Toxic Substances Control & California Regional Water Quality Control Board, Los Angeles Region, January 28, 2003

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cc: Trent Ripley, Green Star Environmental, 354 McDonnell Street, Suite 9, Lewisville, TX 75057
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA
94612-2032 (Sent via E-mail to: lgriffin@oaklandnet.com)
Donna Drogos, ACEH (Sent via E-mail to: donna.drogos@acgov.org)
Paresh Khatri, ACEH (Sent via E-mail to: paresh.khatri@acgov.org)
GeoTracker
File

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)	ISSUE DATE: July 5, 2005
	REVISION DATE: March 27, 2009
	PREVIOUS REVISIONS: December 16, 2005, October 31, 2005
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

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- 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)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

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
Or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of My Le Huynh.
 - 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 and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - 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.