



October 5, 2018

Ms. Susan Kirkpatrick
Greyhound Lines, Inc.
c/o FirstGroup America, Inc.
600 Vine Street, Suite 1400
Cincinnati, OH 45202
(Sent via electronic mail to: Susan.Kirkpatrick@firstgroup.com)

Subject: Updated FS/CAP Request; Fuel Leak Case No. RO0000074 and GeoTracker Global ID T0600100666, Oakland Bus Terminal, 2103 San Pablo Avenue, Oakland, CA 94608

Dear Ms. Kirkpatrick:

Thank you for meeting with Alameda County Department of Environmental Health (ACDEH) staff on October 4, 2018. The meeting was productive and facilitated direct and more efficient communication between all parties in regards to data gaps at the site as communicated in ACDEH's August 29, 2018 directive letter, and with respect to a range of potential corrective actions for residual contamination at the site.

As discussed in the meeting, and communicated in the August 29, 2018 directive letter, ACDEH's review of site data has indicated that the site does not meet the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on the review, we have determined that the site fails to meet the LTCP General Criteria f (Secondary Source Removal) and the Media-Specific Criteria for Groundwater, the Media-Specific Criteria for Vapor Intrusion to Indoor Air, and the Media-Specific Criteria for Direct Contact (see Geotracker).

Based on the discussions at the meeting, and review of the case file, ACDEH requests that you address the following technical comments and send us the reports described below.

TECHNICAL COMMENTS

- 1. Updated Feasibility Study / Corrective Action Plan (FS/CAP)** – It is appropriate to update the FS/CAP to incorporate recently collected soil, groundwater, and soil vapor data into the FS/CAP decision matrix. The recently collected data is likely to effect the range of remedial choices for the site. As discussed in the meeting, ACDEH regards an FS/CAP as a toolkit of potentially viable corrective action options for a site, and provided an option has been included in the toolkit additional public comment will likely not be required should the most likely option prove not to be viable. Please submit the revised FS/CAP by the date identified below.

As before, please specify appropriate cleanup levels and cleanup goals in accordance with the LTCP and 23 CCR Section 2725, 2726, and 2727, in the FS/CAP. Please include the following minimum information:

- Detailed description of proposed remediation including confirmation sampling and monitoring during implementation (a performance monitoring network).
- Appropriate pilot testing of limited duration.
- Collection of any necessary data during pilot test(s) for remedial design, as a data gap investigation to assist in identifying the treatment area, or to fill LTCP data gaps. This is requested to include biological analysis of site media as discussed in the meeting.
- Appropriate groundwater and vapor monitoring during corrective actions to ensure protectiveness to indoor air during and in a post-remedial phase. As communicated in the meeting, ACDEH is

concerned about the risk of vapor intrusion from the previously identified remedial option due to potential fracking of the surficial clay that may provide some protection from vapor intrusion to the existing building.

- Post-remediation monitoring.
- Schedule for implementation of cleanup.

As before, the FS/CAP must evaluate a minimum of three viable alternatives for remedying or mitigating the actual or potential adverse effects of the unauthorized release(s) besides the 'no action' and 'monitored natural attenuation' remedial alternatives. Each alternative shall be evaluated not only for cost-effectiveness but also its timeframe to reach cleanup levels and cleanup goals, and ultimately the Responsible Party must propose the most cost-effective corrective action.

Please be aware that public participation is a requirement for the Corrective Action Plan process. Therefore, we request that you submit the FS/CAP for ACDEH review and a Draft Public Notification Fact Sheet. Two examples will be forwarded under separate cover. Upon ACDEH approval of the documents, ACDEH will notify potentially affected members of the public who live or own property in the surrounding area of the proposed remediation described in the CAP. Public comments on the proposed remediation will be accepted for a 30-day period.

TECHNICAL REPORT REQUEST

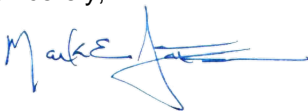
Please submit the following technical reports and deliverables to the State Water Board's Geotracker website and notify your case worker by electronic mail (mark.detterman@acgov.org), in accordance with the following specified file naming convention and schedule, as provided below, and in the Responsible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

- **December 14, 2018** – Revised FS/CAP
File to be named: RO74_FS/CAP_R_YYYY-mm-dd
- **December 14, 2018 (Revised)** – Work Plan and Updated Focused SCM (can be combined with above); File to be named: RO74_WP_R_YYYY-mm-dd
- **November 2, 2018** – Second 2018 Semi-Annual Groundwater Monitoring
File to be named: RO74_GWM_R_YYYY-mm-dd
- **May 3, 2019** – First 2019 Semi-Annual Groundwater Monitoring
File to be named: RO74_GWM_R_YYYY-mm-dd

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.

Sincerely,



Mark E. Detterman, PG 4799, CEG 1788
Senior Hazardous Materials Specialist

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

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cc: Leonard Albright, Green Star Environmental, 354 McDonnell Street, Suite 9, Lewisville, TX 75057
(Sent via electronic mail to: LCAlbright@greenstarencironmental.com)

Terrance Harriman, Green Star Environmental, 354 McDonnell Street, Suite 9, Lewisville, TX 75057 (Sent via electronic mail to: TAHarriman@greenstarencironmental.com)

William Little, Advanced GeoEnvironmental, Inc, 837 Shaw Road, Stockton, CA 95215
(Sent via electronic mail to: WLittle@advgeoenv.com)

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

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

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

Electronic File; GeoTracker

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

- 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 values¹ 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
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	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	✓	✓	✓	✓	✓

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

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: 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/

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.