

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Thursday, February 20, 2014 10:53 AM
To: 'Karen Emery'
Cc: Roe, Dilan, Env. Health
Subject: RE: City of Oakland Corp Yard RO141
Attachments: RO141_Signed_DWR_Form.pdf; Attachment_1_and_ftpUploadInstructions_2013_09-17.pdf; Attachment A Preferential Pathway and Sensitive Receptor Survey.pdf; Attachment B Site Conceptual Model.pdf; Attachment C Path to Closure Project Schedule.pdf

Karen,

Sorry for the delay; it's been a bit hectic. Regardless, here's the signed DWR form.

Please also forward a signed copy of the Alameda County Dept of Public Works well survey form (available from the ACPWA website) as the two databases are different enough to get interesting results, and thus will capture a more complete well record of the location. Both information sources will help move the case along a Path to Closure.

In order to expedite that path, ACEH requests site information be organized when submitted in a limited and focused Site Conceptual Model that identifies site data gaps, evaluates potential conduits (utilities and wells), evaluates the site under the Low Threat Closure Policy, includes a Data Gap Work Plan as needed, and details a Path to Closure Schedule. As you are likely aware, LTCP and Path to Closure reviews of cases are available on Geotracker and ACEH does not believe the site meets the LTCP at this time. However, if you can provide information, reports, and data that fill some of the data gaps that ACEH has identified under the LTCP, ACEH will be able to review them and make any changes to its understanding of the site under the LTCP. This may (or may not) preclude the need for field work. Please see Attachment A (Preferential Pathway and Sensitive Receptor Survey), Attachment B (Site Conceptual Model) and Attachment C (Path to Closure Schedule) for the requisite detail for these items.

If you (SCA) and Mr. Nair would like to come in to discuss this site in order to help identify Paths to Closure for the sites, ACEH would be interested. We have been holding a number of meetings that have substantially accelerated work at a number of sites. Let me know and we can arrange a day and time.

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 specified file naming convention below, according to the following schedule:

- April 25, 2014 – Resulting Report
File to be named RO141_SCM / WP / RFC_R_yyyy-mm-dd (as appropriate)

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.

Should you have questions, please let me know.

Mark Detterman
Senior Hazardous Materials Specialist, PG, CEG Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
Direct: 510.567.6876
Fax: 510.337.9335
Email: mark.detterman@acgov.org

PDF copies of case files can be downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>

-----Original Message-----

From: Karen Emery [<mailto:kemery@sca-enviro.com>]

Sent: Thursday, February 13, 2014 10:27 AM

To: Detterman, Mark, Env. Health

Subject: City of Oakland Corp Yard RO#141

Hi Mark,

We are working with Gopal Nair with the City of Oakland to prepare the Conceptual Site Model for the above referenced site.

In order for us to obtain the well survey from DWR we have to submit the Well Completion Report Release Agreement - Agency Study form. The attached form requires your signature as the casework for this site.

When you have a moment, would you please complete the bottom right boxes, then scan and email back to me such that we can submit it to DWR?

Please let me know if you have any questions. Thanks for your assistance.

Regards,

Karen

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Karen A. Emery, P.G.

Senior Geologist

SCA Environmental, Inc.

tel: 510.457.1708

cell: 510.717.3848

Attachment 1

Responsible Party(ies) Legal Requirements/Obligations

REPORT/DATA REQUESTS

These reports/data are being requested pursuant to Division 7 of the California Water Code (Water Quality), Chapter 6.7 of Division 20 of the California Health and Safety Code (Underground Storage of Hazardous Substances), and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations (Underground Storage Tank Regulations).

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (Local Oversight Program [LOP] for unauthorized releases from petroleum Underground Storage Tanks [USTs], and Site Cleanup Program [SCP] for unauthorized releases of non-petroleum hazardous substances) require submission of reports in electronic format pursuant to Chapter 3 of Division 7, Sections 13195 and 13197.5 of the California Water Code, and Chapter 30, Articles 1 and 2, Sections 3890 to 3895 of Division 3 of Title 23 of the California Code of Regulations (23 CCR). Instructions for submission of electronic documents to the ACEH FTP site are provided on the attached "Electronic Report Upload Instructions."

Submission of reports to the ACEH FTP site is in addition to requirements for electronic submittal of information (ESI) to the State Water Resources Control Board's (SWRCB) Geotracker website. In April 2001, the SWRCB adopted 23 CCR, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1 (Electronic Submission of Laboratory Data for UST Reports). Article 12 required electronic submittal of analytical laboratory data submitted in a report to a regulatory agency (effective September 1, 2001), and surveyed locations (latitude, longitude and elevation) of groundwater monitoring wells (effective January 1, 2002) in Electronic Deliverable Format (EDF) to Geotracker. Article 12 was subsequently repealed in 2004 and replaced with Article 30 (Electronic Submittal of Information) which expanded the ESI requirements to include electronic submittal of any report or data required by a regulatory agency from a cleanup site. The expanded ESI submittal requirements for petroleum UST sites subject to the requirements of 23 CCR, Division, 3, Chapter 16, Article 11, became effective December 16, 2004. All other electronic submittals required pursuant to Chapter 30 became effective January 1, 2005. Please visit the SWRCB website for more information on these requirements: (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, 7835, 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, 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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: July 25, 2012
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (petroleum UST 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
 - 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 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.

ATTACHMENT A

Preferential Pathway and Sensitive Receptor Study

Preferential Pathway and Sensitive Receptor Study – Please conduct a study to (1) locate potential anthropogenic migration pathways on and in the vicinity of the site that could spread contamination through vertical and lateral migration, (2) determine the probability of nonaqueous phase liquid (NAPL) and/or contaminant plumes (groundwater and/or soil vapor) encountering anthropogenic preferential pathways, and (3) identify exposure scenarios and sensitive receptors that are linked to site contamination through these preferential pathways. The results of your study shall contain all information required by California Code of Regulations, Title 23, Division 3, Chapter 16, §2654(b) including but not limited to the following components, as applicable to the site:

- I. **Utility Survey** - An evaluation of all existing subsurface utility lines, laterals, and trenches including sewers, electrical, fiber optic cable, cable, water, storm drains, trench backfill, etc. within and near the site and plume area(s). Please include an evaluation of utilities associated with current and historical site operations/processes including UST systems, remediation systems, parts cleaning, sumps, etc.
- II. **Well Survey** – Identification of all active, inactive, standby, decommissioned (sealed with concrete), unrecorded, and abandoned (improperly decommissioned or lost) wells including monitoring, remediation, irrigation, water supply, industrial, livestock, dewatering, and cathodic protection wells within a ¼-mile radius of the subject site. Please inspect all available Well Completion Reports filed with the Department of Water Resources (DWR) and Alameda County Public Works in your survey, and perform a background study of the historical land uses of the site and properties in the vicinity of the site. Use the results of your background study to determine the existence of unrecorded/unknown (abandoned) wells, which can act as contaminant migration pathways at or from your site.
- III. **Building Evaluation** – Identification of existing and historical building foundational elements that can link potential receptors to the contaminant plumes and/or act as preferential pathways for contaminant migration. Include the age, type, and depth of element (e.g., slab on grade, grade beam, piers, basements, etc.), and associated engineering control systems (vapor barriers, etc).
- IV. **Land Uses and Exposure Scenarios on the Facility and Adjacent Properties** – Identification of existing and future land use on and in the vicinity of the site including:
 - Beneficial resources (e.g., groundwater classification, wetlands, surface water bodies, natural resources, etc.)
 - Subpopulation types and locations (e.g., schools, hospitals, day care centers, elder care facilities, etc.)
 - Exposure scenarios (e.g. residential, industrial, recreational, farming) and exposure pathways including those identified in the Low Threat Underground Storage Tank Case Closure Policy General Criteria h – Nuisance Conditions, and Media-Specific Criteria for Groundwater, Vapor Intrusion to Indoor Air, and Direct Contact and Outdoor Air Exposure
- V. **Planned Development** – If future development activities are planned in the vicinity of the site, include an analysis of new utility corridors, building foundations, wells, and/or development activities that could significantly alter contaminant migration (i.e., covering of large areas of the site with pavement, etc.).

Please synthesize this information and discuss your analysis and interpretation of the results of the preferential pathway and sensitive receptor study and incorporate into an updated Conceptual Site Model. Please provide the following supporting documentation and data as applicable:

ATTACHMENT A

- Copies of current and historical maps, such as site maps, Sanborn maps, aerial photographs, etc., used when conducting the background study.
- DWR well logs, marked as confidential, uploaded to Alameda County Environmental Health's ftp site. For confidentiality purposes do not upload the DWR well logs to Geotracker. The well logs will be placed in our confidential file and will be available only to internal staff for review.
- Table with details of the well search findings including Map ID corresponding to well location on map, State Well ID, Well Owner ID, approximate distance from the site, direction from the site, use, installation date, depth (feet below ground surface [bgs]), screened interval (feet bgs), sealed interval (feet bgs), diameter (inches), and well location address.
- Maps and geologic cross-sections illustrating historical groundwater elevations and flow directions (rose diagram) at the site. Synthesize the data requested above and include the location and depth of all utility lines, trenches, UST pits and piping trenches, wells, surface water bodies, foundational elements, surface covering types (pavement, landscaped, etc.) within and near the site and plume area(s), and the location of potential receptors.

ATTACHMENT B

Site Conceptual Model Requisite Elements

ATTACHMENT B

Site Conceptual Model

The site conceptual model (SCM) is an essential decision-making and communication tool for all interested parties during the site characterization, remediation planning and implementation, and closure process. A SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely magnitude of potential impacts to receptors.

The SCM is initially used to characterize the site and identify data gaps. As the investigation proceeds and the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened until it is said to be "validated". At this point, the focus of the SCM shifts from site characterization towards remedial technology evaluation and selection, and later remedy optimization, and forms the foundation for developing the most cost-effective corrective action plan to protect existing and potential receptors.

For ease of review, Alameda County Environmental Health (ACEH) requests utilization of tabular formats to (1) highlight the major SCM elements and their associated data gaps which need to be addressed to progress the site to case closure (see Table 1 of attached example), and (2) highlight the identified data gaps and proposed investigation activities (see Table 2 of the attached example). ACEH requests that the tables presenting the SCM elements, data gaps, and proposed investigation activities be updated as appropriate at each stage of the project and submitted with work plans, feasibility studies, corrective action plans, and requests for closures to support proposed work, conclusions, and/or recommendations.

The SCM should incorporate, but is not limited to, the topics listed below. Please support the SCM with the use of large-scaled maps and graphics, tables, and conceptual diagrams to illustrate key points. Please include an extended site map(s) utilizing an aerial photographic base map with sufficient resolution to show the facility, delineation of streets and property boundaries within the adjacent neighborhood, downgradient irrigation wells, and proposed locations of transects, monitoring wells, and soil vapor probes.

- a. Regional and local (on-site and off-site) geology and hydrogeology. Include a discussion of the surface geology (e.g., soil types, soil parameters, outcrops, faulting), subsurface geology (e.g., stratigraphy, continuity, and connectivity), and hydrogeology (e.g., water-bearing zones, hydrologic parameters, impermeable strata). Please include a structural contour map (top of unit) and isopach map for the aquitard that is presumed to separate your release from the deeper aquifer(s), cross sections, soil boring and monitoring well logs and locations, and copies of regional geologic maps.
- b. Analysis of the hydraulic flow system in the vicinity of the site. Include rose diagrams for depicting groundwater gradients. The rose diagram shall be plotted on groundwater elevation contour maps and updated in all future reports submitted for your site. Please address changes due to seasonal precipitation and groundwater pumping, and evaluate the potential interconnection between shallow and deep aquifers. Please include an analysis of vertical hydraulic gradients, and effects of pumping rates on hydraulic head from nearby water supply wells, if appropriate. Include hydraulic head in the different water bearing zones and hydrographs of all monitoring wells.
- c. Release history, including potential source(s) of releases, potential contaminants of concern (COC) associated with each potential release, confirmed source locations, confirmed release locations, and existing delineation of release areas. Address primary leak source(s) (e.g., a tank, sump, pipeline, etc.) and secondary sources (e.g., high-

ATTACHMENT B

Site Conceptual Model (continued)

concentration contaminants in low-permeability lithologic soil units that sustain groundwater or vapor plumes). Include local and regional plan view maps that illustrate the location of sources (former facilities, piping, tanks, etc.).

- d. Plume (soil gas and groundwater) development and dynamics including aging of source(s), phase distribution (NAPL, dissolved, vapor, residual), diving plumes, attenuation mechanisms, migration routes, preferential pathways (geologic and anthropogenic), magnitude of chemicals of concern and spatial and temporal changes in concentrations, and contaminant fate and transport. Please include three-dimensional plume maps for groundwater and two-dimensional soil vapor plume plan view maps to provide an accurate depiction of the contaminant distribution of each COC.
- e. Summary tables of chemical concentrations in different media (i.e., soil, groundwater, and soil vapor). Please include applicable environmental screening levels on all tables. Include graphs of contaminant concentrations versus time.
- f. Current and historic facility structures (e.g., buildings, drain systems, sewer systems, underground utilities, etc.) and physical features including topographical features (e.g., hills, gradients, surface vegetation, or pavement) and surface water features (e.g. routes of drainage ditches, links to water bodies). Please include current and historic site maps.
- g. Current and historic site operations/processes (e.g., parts cleaning, chemical storage areas, manufacturing, etc.).
- h. Other contaminant release sites in the vicinity of the site. Hydrogeologic and contaminant data from those sites may prove helpful in testing certain hypotheses for the SCM. Include a summary of work and technical findings from nearby release sites, including the two adjacent closed LUFT sites, (i.e., Montgomery Ward site and the Quest Laboratory site).
- i. Land uses and exposure scenarios on the facility and adjacent properties. Include beneficial resources (e.g., groundwater classification, wetlands, natural resources, etc.), resource use locations (e.g., water supply wells, surface water intakes), subpopulation types and locations (e.g., schools, hospitals, day care centers, etc.), exposure scenarios (e.g. residential, industrial, recreational, farming), and exposure pathways, and potential threat to sensitive receptors. Include an analysis of the contaminant volatilization from the subsurface to indoor/outdoor air exposure route (i.e., vapor pathway). Please include copies of Sanborn maps and aerial photographs, as appropriate.
- j. Identification and listing of specific data gaps that require further investigation during subsequent phases of work. Proposed activities to investigate and fill data gaps identified.

TABLE 1
INITIAL SITE CONCEPTUAL MODEL

CSM Element	CSM Sub-Element	Description	Data Gap	How to Address
Geology and Hydrogeology	Regional	<p>The site is in the northwest portion of the Livermore Valley, which consists of a structural trough within the Diablo Range and contains the Livermore Valley Groundwater Basin (referred to as "the Basin") (DWR, 2006). Several faults traverse the Basin, which act as barriers to groundwater flow, as evidenced by large differences in water levels between the upgradient and downgradient sides of these faults (DWR, 2006). The Basin is divided into 12 groundwater basins, which are defined by faults and non-water-bearing geologic units (DWR, 1974).</p> <p>The hydrogeology of the Basin consists of a thick sequence of fresh-water-bearing continental deposits from alluvial fans, outwash plains, and lacustrine environments to up to approximately 5,000 feet bgs (DWR, 2006). Three defined fresh-water bearing geologic units exist within the Basin: Holocene Valley Fill (up to approximately 400 feet bgs in the central portion of the Basin), the Plio-Pleistocene Livermore Formation (generally between approximately 400 and 4,000 feet bgs in the central portion of the Basin), and the Pliocene Tassajara Formation (generally between approximately 250 and 5,000 or more feet bgs) (DWR, 1974). The Valley Fill units in the western portion of the Basin are capped by up to 40 feet of clay (DWR, 2006).</p>	None	NA
	Site	<p>Geology: Borings advanced at the site indicate that subsurface materials consist primarily of finer-grained deposits (clay, sandy clay, silt and sandy silt) with interbedded sand lenses to 20 feet below ground surface (bgs), the approximate depth to which these borings were advanced. The documented lithology for one on-site boring that was logged to approximately 45 feet bgs indicates that beyond approximately 20 feet bgs, fine-grained soils are present to approximately 45 feet bgs. A cone penetrometer technology test indicated the presence of sandier lenses from approximately 45 to 58 feet bgs and even coarser materials (interbedded with finer-grained materials) from approximately 58 feet to 75 feet bgs, the total depth drilled. The lithology documented at the site is similar to that reported at other nearby sites, specifically the Montgomery Ward site (7575 Dublin Boulevard), the Quest laboratory site (6511 Golden Gate Drive), the Shell-branded Service Station site (11989 Dublin Boulevard), and the Chevron site (7007 San Ramon Road).</p> <p>Hydrogeology: Shallow groundwater has been encountered at depths of approximately 9 to 15 feet bgs. The hydraulic gradient and groundwater flow direction have not been specifically evaluated at the site.</p>	<p>As noted, most borings at the site have been advanced to approximately 20 feet bgs, and one boring has been advanced and logged to 45 feet bgs; CPT data was collected to 75 feet bgs at one location. Lithologic data will be obtained from additional borings that will be advanced on site to further the understanding of the subsurface, especially with respect to deeper lithology.</p> <p>The on-site shallow groundwater horizontal gradient has not been confirmed. Additionally, it is not known if there may be a vertical component to the hydraulic gradient.</p>	<p>Two direct push borings and four multi-port wells will be advanced to depth (up to approximately 75 feet bgs) and soil lithology will be logged. See items 4 and 5 on Table 2.</p> <p>Shallow and deeper groundwater monitoring wells will be installed to provide information on lateral and vertical gradients. See Items 2 and 5 on Table 2.</p>
Surface Water Bodies		<p>The closest surface water bodies are culverted creeks. Martin Canyon Creek flows from a gully west of the site, enters a culvert north of the site, and then bends to the south, passing approximately 1,000 feet east of the site before flowing into the Alamo Canal. Dublin Creek flows from a gully west of the site, enters a culvert approximately 750 feet south of the site, and then joins Martin Canyon Creek approximately 750 feet southeast of the site.</p>	None	NA
Nearby Wells		<p>The State Water Resources Control Board's GeoTracker GAMA website includes information regarding the approximate locations of water supply wells in California. In the vicinity of the site, the closest water supply wells presented on this website are depicted approximately 2 miles southeast of the site; the locations shown are approximate (within 1 mile of actual location for California Department of Public Health supply wells and 0.5 mile for other supply wells). No water-producing wells were identified within 1/4 mile of the site in the well survey conducted for the Quest Laboratory site (6511 Golden Gate Drive; documented in 2009); information documented in a 2005 report for the Chevron site at 7007 San Ramon Road indicates that a water-producing well may exist within 1/2 mile of the site.</p>	<p>A formal well survey is needed to identify water-producing, monitoring, cathodic protection, and dewatering wells.</p>	<p>Obtain data regarding nearby, permitted wells from the California Department of Water Resources and Zone 7 Water Agency (Item 11 on Table 2).</p>

TABLE 2
DATA GAPS AND PROPOSED INVESTIGATION

Item	Data Gap	Proposed Investigation	Rationale	Analysis
5	<p>Evaluate the possible presence of impacts to deeper groundwater.</p> <p>Evaluate deeper groundwater concentration trends over time.</p> <p>Obtain data regarding the vertical groundwater gradient.</p> <p>Obtain more lithological data below 20 feet bgs.</p>	<p>Install four continuous multichannel tubing (CMT) groundwater monitoring wells (aka multi-port wells) to approximately 65 feet bgs in the northern parking lot with ports at three depths (monitoring well locations may be adjusted pending results of shallow grab groundwater samples; we will discuss any potential changes with ACEH before proceeding). Groundwater monitoring frequency to be determined. Soil samples will be collected only if there are field indications of impacts. Soil lithology will be logged. However, information regarding the moisture content of soil may not be reliable using sonic drilling technology (two borings will be logged using direct push technology; see Item 4, above).</p>	<p>One well is proposed at the western (upgradient) property boundary to confirm that there are no deeper groundwater impacts from upgradient. Two wells are proposed near the center of the northern parking lot to evaluate potential impacts in an area where deeper impacts, if any, would most likely to be found. One well is proposed at the eastern (downgradient) property boundary to confirm that there are no impacts extending off-site. Port depths will be chosen based on the locations of saturated soils (as logged in direct push borings; see Item 4, above), but are expected at approximately 15, 45, and 60 feet bgs.</p>	<p><i>Groundwater:</i> VOCs by EPA Method 8260, dissolved oxygen, oxidation/reduction potential, temperature, pH, and specific conductance.</p>
6	<p>Evaluate possible off-site migration of impacted soil vapor in the downgradient direction (east).</p> <p>Evaluate concentration trends over time.</p>	<p>Install 4 temporary nested soil vapor probes at approximately 4 and 8 feet bgs along the eastern property boundary. Based on the results of the sampling, two sets of nested probes will be converted to vapor monitoring wells to allow for evaluation of VOC concentration trends over time.</p>	<p>Available data indicate that PCE and TCE are present in soil vapor in the eastern portion of the northern parking lot. Samples are proposed on approximately 50-foot intervals along the eastern property boundary to provide a transect of concentrations through the vapor plume. The depths of 4 and 8 feet bgs are chosen to provide data closest to the source (i.e., groundwater) while avoiding saturated soil, and also provide shallower data to help evaluate potential attenuation within the soil column. Two sets of nested vapor probes will be converted into vapor monitoring wells (by installing well boxes at ground surface); the locations of the permanent wells will be chosen based on the results of samples from the temporary probes.</p>	<p><i>Soil vapor:</i> VOCs by EPA Method TO-15.</p>
7	<p>Evaluate potential for off-site migration of impacted groundwater in the downgradient direction (east).</p>	<p>Advance two borings to approximately 20 feet bgs in the parking lot of the property east of the Crown site for collection of grab groundwater samples.</p>	<p>Two borings are proposed off-site, on the property east of the Crown site, just east of the building in the expected area of highest potential VOC concentrations.</p>	<p><i>Groundwater:</i> VOCs by EPA Method 8260, dissolved oxygen, oxidation/reduction potential, temperature, pH, and specific conductance.</p>
8	<p>Evaluate VOC concentrations just north of the highest concentration area.</p>	<p>Advance two borings to approximately 20 feet bgs north of Building A for collection of soil and grab groundwater samples. Soil samples will be collected at two depths in the vadose zone. Soil samples will be collected based on field indications of impacts (PID readings, odor, staining) or, in the absence of field indications of impacts, at 5 and 10 feet bgs.</p>	<p>The highest concentrations of PCE in groundwater were detected at boring NM-B-32, just north of Building A. The nearest available data to the north are approximately 75 feet away. One of the borings will be advanced approximately 20 feet north of NM-B-32 to provide data close to the highest concentration area. A second boring will be advanced approximately halfway between the first boring and former boring NM-B-33 to provide additional spatial data for contouring purposes. These borings will be part of a transect in the highest concentration area.</p>	<p><i>Groundwater:</i> VOCs by EPA Method 8260, dissolved oxygen, oxidation/reduction potential, temperature, pH, and specific conductance.</p> <p><i>Soil:</i> VOCs by EPA Method 8260 (soil samples to be collected using field preservation in accordance with EPA Method 5035).</p>
9	<p>Evaluate VOC concentrations in soil vapor in the south parcel of the site.</p>	<p>Install four temporary soil vapor probes at approximately 5 feet bgs around boring SV-25, where PCE was detected in soil vapor at a low concentration.</p>	<p>PCE was detected in soil vapor sample SV-25 in the southern parcel, although was not detected in groundwater in that area. Three probes will be installed approximately 30 feet from of boring SV-25 to attempt to delineate the extent of impacts. A fourth probe is proposed west of the original sample, close to the property boundary and the location of mapped utility lines, which may be a potential conduit, to evaluate potential impacts from the west.</p>	<p><i>Soil vapor:</i> VOCs by EPA Method TO-15.</p>
10	<p>Obtain additional information regarding subsurface structures and utilities to further evaluate migration pathways and sources.</p>	<p>Ground penetrating radar (GPR) and other utility locating methodologies will be used, as appropriate, to further evaluate the presence of unknown utilities and structures at the site.</p>	<p>Utilities have been identified at the site that include an on-site sewer lateral and drain line, and shallow water, electric, and gas lines. Given the current understanding of the distribution of PCE in groundwater at the site, it is possible that other subsurface utilities, and specifically sewer laterals, exist that may act as a source or migration pathway for distribution of VOCs in the subsurface.</p>	<p style="text-align: center;">NA</p>

ATTACHMENT C

Path to Closure Project Schedule Requisite Elements

ATTACHMENT C

Path to Closure Project Schedule Requisite Elements

The State Water Resources Control Board passed Resolution No. 2012-0062 on November 6, 2012 which requires development of a "Path to Closure Plan" by December 31, 2013 that addresses the impediments to closure for the site. Please prepare a Path to Closure Schedule that has milestone dates tied to calendar quarters which will achieve site cleanup and case closure in a timely and efficient manner and minimizes the cost of corrective action. The complexity of the Path to Closure Schedule should be commensurate with the complexity of the site and tasks required to achieve case closure. ACEH will review the schedule to ensure appropriate key elements are included.

The Path to Closure Schedule should include the following key environmental elements and milestones as appropriate:

- Preferential Pathway Study
- Soil, Groundwater, and Soil Vapor Investigations
- Initial, Updated, and Final/Validated SCMs
- Interim Remedial Actions
- Feasibility Study/Corrective Action Plan
- Pilot Tests
- Remedial Actions
- Soil Vapor and Groundwater Monitoring Well Installation and Monitoring
- Public Participation Program (Fact Sheet Preparation/Distribution/Public Comment Period, Community Meetings, etc.)
- Case Closure Tasks (Request for closure documents, ACEH Case Closure Summary Preparation and Review, Site Management Plan, Institutional Controls, Public Participation, Landowner Notification, Well Decommissioning, Waste Removal, and Reporting.)

Please include time for regulatory and RP in house review, permitting, off-site access agreements, and utility connections, etc.

For complex projects (i.e., redevelopment projects, etc.), please use a critical path methodology/tool to construct a schedule with sufficient detail to support a realistic and achievable Path to Closure Schedule. The schedule is to include at a minimum:

- Defined work breakdown structure including summary tasks required to accomplish the project objectives and required deliverables
- Summary task decomposition into smaller more manageable components that can be scheduled, monitored, and controlled
- Sequencing of activities to identify and document relationships among the project activities using logical relationships
- Identification of critical paths, linkages, predecessor and successor activities, leads and lags, and key milestones
- Identification of entity responsible for executing work
- Estimated activity durations (60-day ACEH review times are based on calendar days)

DEPARTMENT OF WATER RESOURCES

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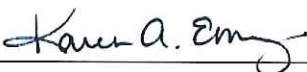
WELL COMPLETION REPORT RELEASE AGREEMENT—AGENCY STUDY
(Government Agencies and their Authorized Agents)

Under California Water Code Section 13752, the agency named below requests permission from Department of Water Resources to inspect or copy, or for our authorized agent named below to inspect or copy, Well Completion Reports filed pursuant to Section 13751 to make a study.


In accordance with Section 13752, information obtained from these reports shall be kept confidential and shall not be disseminated, published, or made available for inspection by the public. The information shall be used only for the purpose of conducting the study. Copies obtained shall be stamped **CONFIDENTIAL** and shall be kept in a restricted file accessible only to agency staff or the authorized agent for this study.

Project Name: City of Oakland Corporation Yard County: Alameda
Street Address: 5921 Shepherd Canyon Road City: Oakland
Township, Range, and Section: 1S, 3W, Section 21 Radius: 2,000 feet
(Include entire study area and a map that shows the area of interest.)

SCA Environmental, Inc.
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Karen Emery
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