



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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April 29, 2015

Mr. Christopher Payne
ARC - Blue Print Service
945 Bryant Street
San Francisco, CA 94103
(Sent via E-mail to: christopher.payne@e-arc.com)

Mr. Matthew Westbrook
ARC Document Solutions
1981 N. Broadway, Suite 385
Walnut Creek, CA 94596

Subject: Modified Approval of Foundation Survey Recommendations; Fuel Leak Case No. RO0000151 and GeoTracker Global ID T0600100196, City Blue Print, 1700 Jefferson St., Oakland, CA 94612

Dear Messrs. Payne and Westbrook:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Foundation Depth Survey Report*, dated March 10 2015 that was prepared and submitted on your behalf by Applied Water Resources (AWR). Based on the results of the foundation survey AWR recommends keeping the installation depth of the planned on- and off-site temporary soil vapor points at a depth of approximately six feet below grade surface (bgs). An access agreement is reported to be pending; however, if an agreement cannot be signed to allow installation of the temporary vapor point in the below grade courtyard, AWS proposes to install this temporary vapor point to a depth of 17 feet bgs along the south side of 18th Street proximal to the below grade apartment building and monitoring well MW-5 that contains the highest hydrocarbon concentrations in groundwater in the site vicinity.

Based on ACEH 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 work. 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 these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Once field work is approved, please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- 1. Work Plan Comments and Clarifications** – The referenced work plan proposes a series of actions with which ACEH is generally in agreement of undertaking; however, ACEH requests several additional important modifications to the approach beyond those previously provided. Please incorporate these additional modifications with those previously requested (see the directive letter dated June 19, 2014).
 - a. Evaluation of Residual Source Areas Onsite** – In the previous directive letter (June 19, 2014), in addition to other items requested, ACEH requested the installation of an additional soil bore based on the review of Sanborn Maps which indicate a “Pit” was formerly located in the northwestern corner of the subject property. In addition to the analytes requested for this bore location (TPHg, benzene, toluene, ethylbenzene, toluene, total xylenes [BTEX], and methyl tert butyl ether [MTBE]), TPH as diesel (TPHd), TPH as motor oil (TPHmo), and naphthalene), ACEH additionally requests analysis for Poly-Aromatic Hydrocarbons (PAHs), in conformity with Low Threat Closure Policy (LTCP) requirements for evaluating potential waste oil contaminants.
 - b. Installation of Permanent Soil Vapor Wells** – The referenced building foundation survey indicated that temporary vapor points would be installed to investigate on- and off-site soil vapor

concentrations. To reiterate the previous directive letter (June 19, 2014), due to the potential threat of vapor intrusion at the site, and at the adjacent below grade apartment building due to significant elevated groundwater concentrations (benzene concentrations up to 11,000 micrograms per liter [$\mu\text{g/l}$]) in proximity to the below grade apartment building, ACEH reiterates the requirement that permanent vapor wells be installed rather than temporary well points. This will allow the collection of multiple soil vapor samples at each location, in accordance with DTSC guidelines, and will assess temporal and seasonal variations in soil gas concentrations. Please be aware that ACEH has not approved temporary vapor points at this site. As such they are not reimbursable by the UST Cleanup Fund.

In an effort to quickly assess the risk of vapor intrusion to the below grade apartment building, ACEH additionally requests the installation of a second deep (17 feet bgs) permanent soil vapor well on the subject site, in association with proposed location C6. To preclude data conflicts from vapor wells that may leak or short circuit, ACEH requests the wells be co-located, but not nested.

- c. Soil Vapor Sampling** – As requested before, please ensure that your vapor sampling strategy is consistent with the field sampling protocols described in the Department of Toxic Substances Control's Final Vapor Intrusion Guidance (October 2011). Please include atmospheric gases (carbon dioxide and oxygen), methane, and tracer concentrations in both the vapor sample and the shrouds in accordance with DTSC guidelines. In the event of the detection of the tracer in the vapor sample, the shroud vapor concentration will allow the determination if the leak rate is acceptable or not, in accordance with DTSC guidelines.
- 2. Site Investigation Report and Focused Site Conceptual Model** – Please address the Technical comments above, and in the previous directive letter, update the Site Conceptual Model (SCM), and report the results of the field work in a Site Investigation Report in accordance with the schedule below. Please review the site under the LTCP, and if appropriate include a Data Gap Work Plan for any remaining data gaps. Please include Data Quality Objectives (DQOs) in the Data Gap Work Plan that relate the data collection to each LTCP criteria. For example please clarify which scenario within each Media-Specific Criteria a sampling strategy is intended to apply to.

In order to expedite review, ACEH requests the focused SCM be presented in a tabular format that highlights the major SCM elements and associated data gaps, which need to be addressed to progress the site to case closure under the LTCP. Please see the previously forwarded Attachment A: *Site Conceptual Model Requisite Elements*. Please sequence any activities proposed to enable efficient data collection in the fewest mobilizations possible.

- 3. Annual Groundwater Monitoring and Sampling** – Based on the extensive historic record of groundwater sampling at the site, it appears appropriate to reduce the groundwater monitoring interval to an annual basis, using the month of March of a given year to collect groundwater samples from wells associated with the site. This is expected to capture the worst-case groundwater concentration beneath the site. If groundwater monitoring has not been conducted in 2015, please collect the required samples in the month of May and convert to groundwater sampling in March of 2016. Please be aware that if appropriate, reversion to a semi-annual or quarterly groundwater monitoring may be required as the case moves forward. Please continue to conduct groundwater monitoring and sampling and submit reports as identified below.

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 following specified file naming convention and schedule:

- **July 17, 2015** – First 2015 Semi-Annual Groundwater Monitoring Report
(File to be named RO151_GWM_R_yyyy-mm-dd)
- **July 24, 2015** – Site Investigation Report (reports can be combined using this date)

Messrs. Payne and Westbrook
RO0000151
April 29, 2015, Page 3

(File to be named RO151_SWI_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>. If your email address does not appear on the cover page of this notification, ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark E. Detterman, P.G., C.E.G.
Senior Hazardous Materials Specialist

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

cc: Steven Michelson, Applied Water Resources Corporation, 1600 Riviera Avenue, Suite 310, Walnut Creek, CA 94596 (Sent via E-mail to: smichelson@awrcorp.net)

Yola Bayram, Applied Water Resources Corporation, 1600 Riviera Avenue, Suite 310, Walnut Creek, CA 94596 (Sent via E-mail to: ybayram@awrcorp.net)

Dilan Roe, ACEH (sent via electronic mail to dilan.roe@acgov.org)
Mark Detterman (sent via electronic mail to 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

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.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, 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.

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| Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) | REVISION DATE: May 15, 2014 |
| | ISSUE DATE: July 5, 2005 |
| | PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010 |
| 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

- **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.