

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY, SUITE 250
ALAMEDA, CA 94502
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December 5, 2016

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: Draft Corrective Action Plan Request; 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 Department of Environmental Health (ACDEH) staff has reviewed the case file including the *Annual Ground Water Monitoring Report, 2016*, dated May 31, 2016, and the *Site Investigation Report*, dated October 11, 2016. The reports were prepared and submitted on your behalf by Applied Water Resources (AWR). Thank you for submitting the reports.

The referenced investigation report documented the installation of soil bores C1 to C20, the installation of temporary and permanent soil vapor points SV1 to SV14, and sub-slab soil vapor point SS1. The data was collected to investigate the nature of the hydrocarbon release at the subject site, determine areas of residual soil contamination and associated concentrations, define the extent of groundwater contamination, to determine if groundwater concentrations at well MW-5 are related to the release at the site or represent another source, and to investigate the potential for health risks to site or vicinity occupants.

ACDEH has evaluated the data and recommendations presented in the above-mentioned reports, in conjunction with the case files, to determine if the site is eligible for closure as a low risk site under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on ACDEH staff 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, and the Media-Specific Criteria for Vapor Intrusion to Indoor Air. Sufficient information appears to have been collected to determine that the site meets the Media-Specific Criteria for Direct Contact (see Geotracker for an updated evaluation).

Based on ACDEH staff review of the case file, we request that you address the following technical comments and send us the reports described below.

TECHNICAL COMMENTS

- 1. Corrective Action Plan** – At this juncture, ACDEH requests that you prepare a Draft *Feasibility Study and Corrective Action Plan* (FS/CAP) prepared in accordance with Title 23, California Code of Regulations, Section 2725. The FS/CAP must include a concise background of soil and groundwater investigations performed in connection with this case and an assessment of the residual impacts of the chemicals of concern (COCs) for the site and the surrounding area where the unauthorized release has migrated or may migrate. The FS/CAP should also include, but is not limited to, a detailed description of site lithology, including soil permeability, and most importantly, contamination cleanup levels and cleanup goals, in accordance with the LTCP, and as necessary the San Francisco Regional Water Quality Control Board (SFRWQCB) Environmental Screening Levels (ESL), or a site-specific risk assessment, for all COCs and for the appropriate groundwater or land-use designation. Please note that cleanup levels should ultimately (within a reasonable timeframe) achieve site cleanup objectives (goals) for groundwater, soil, and soil vapor in accordance with the LTCP, ESLs,

or site specific target levels. Please specify appropriate cleanup levels and cleanup goals in accordance with 23 CCR Section 2725, 2726, and 2727 in the FS/CAP.

The FS/CAP must evaluate at least three viable alternatives for remedying or mitigating the actual or potential adverse affects of the unauthorized release(s) besides the 'no action' and 'monitored natural attenuation' remedial alternatives. Each alternative is to 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. If pilot tests are required to determine radius of influence (ROI) or other site specific parameters, please include a work plan to conduct the pilot tests or collect other necessary data.

Please be aware, that public participation is a requirement for the Corrective Action Plan process. Therefore, we request that you submit a Draft CAP for ACDEH review. Upon ACDEH approval of a Draft CAP, ADCEH will notify potentially affected members of the public who live or own property in the surrounding area of the proposed remediation described in the Draft CAP. Public comments on the proposed remediation will be accepted for a 30-day period.

Please submit the FS/CAP and pilot test work plan by the date identified below.

- 2. Data Gap Work Plan** – In addition to any data gaps that will be identified for the FS/CAP process, the referenced investigation report identified a number of remaining data gaps requiring additional investigation at the site. This included further assessment of potential vapor intrusion risks to the onsite building, adjacent buildings, as well as the building adjacent to MW-5. ACDEH's preference is to minimize indoor air vapor sampling due to the potential for cross-contamination complications from consumer products, and initially prefers additional soil vapor and sub-slab vapor sampling in buildings when appropriate.

Please be aware that based on a one time sampling event at SV6 and SV8, the eastern portion of the building at the site appears to be sufficiently separated from groundwater contamination as to preclude vapor risks. However, if an unreported basement is present at the site, or sites adjacent to the west, north, northeast, and east, this understanding will require reconsideration. Conversely, data from SV4 in the western portion of the onsite building indicates a vapor intrusion risk to the building.

Due in part to unsuccessful data collection, the report additionally recommended further assessment of groundwater and soil vapor on the south side of 18th Street to determine if contamination at well MW-5 is associated with the subject site or is another release requiring separation from this case. ACDEH is in agreement.

Finally, based on the predominate groundwater flow direction identified in the rose diagram included in the report (Figure 8) and substantial residual contamination at soil bore C2, ACDEH has identified an additional groundwater delineation data gap to the northwest of the site, between well MW-6 and soil bore C-13. Please submit a data gap work plan by the date identified below.

- 3. Electronic Report and Data Upload Compliance** – A review of the case file and the State's Geotracker database indicates that the site is not in compliance with previous directive letters. Compliance is also a State requirement. Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs, including SCP programs. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites was required in GeoTracker.

At present missing data and documents include, but may not be limited to, EDF submittals for recent work (soil and groundwater analytical data) and all bore logs. Compliance is required by the State

and is tied to reimbursement funding by the UST Cleanup Fund. Please see Attachment 1 for limited additional details, and the state GeoTracker website for full details. ACDEH requests notification of, and a list of, the documents uploaded to Geotracker. Please upload all submittals to GeoTracker as well as to ACDEH's ftp website by the date specified below.

- 4. Annual Groundwater Monitoring and Sampling** – Please continue to conduct annual groundwater monitoring and sampling events, and submit a report by the date identified below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH 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:

- **February 17, 2017** – FS/CAP and Pilot Test and Data Gap Work Plan
(File to be named RO151_CAP_WP_R_yyyy-mm-dd)
- **May 19, 2017** – Annual 2017 Groundwater Monitoring Report
(File to be named RO151_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>. If your email address does not appear on the cover page of this notification, ACDEH 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 &
ACDEH Electronic Report Upload (ftp) Instructions

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

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

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

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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) 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 File Transfer Protocol (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 SCP 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 (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/) for more information on these requirements.

PERJURY 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 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, 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: December 1, 2016
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions


The Alameda County Environmental Cleanup Oversight Programs (LOP 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) Open File Explorer using the Windows  key + E keyboard shortcut.
 - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) On the address bar, type in ftp://alcoftp1.acgov.org.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
 - d) Click Log On.
 - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - f) 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.