



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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December 20, 2011

Linda Zitner (*Sent via email to: lzitner@mills.edu*)  
Mills College  
5000 MacArthur Boulevard  
Oakland, CA 94619

Subject: Fuel Leak Case No. RO0000155 and Geotracker Global ID T0600100899, Mills College, 5000 MacArthur Boulevard, Oakland, CA 94619

Dear Ms. Zitner:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the most recent submittal entitled, *January 2000 Ground Water Sampling Report Mills College Corporation Yard, Oakland, California* dated January 18, 2000, and the *Request for Case Closure Mills College – Toyon Meadow, Oakland, California* dated December 11, 1995 prepared by Harza Consulting Engineering Company, Inc. (Harza). The file indicates that two underground storage tanks (USTs) were removed from the property from the Corporation Yard Facility and Toyon Meadow. Investigations revealed that maximum soil concentrations remaining in soil from the Corporation Yard were 2,100 milligrams per kilogram (mg/kg) total petroleum hydrocarbons as gasoline (TPHg) and 21 mg/kg benzene from 16 feet below ground surface (bgs) in boring EB-2. Groundwater monitoring wells were installed and sampled with maximum groundwater concentrations of 1,100 micrograms per liter (µg/L) TPHg and 170 µg/L benzene in groundwater obtained from well MW-1 in the latest monitoring event — performed in 2000.

Soil samples collected from the Toyon Meadow UST contained a maximum concentration of 11,000 mg/kg TPH as diesel (TPHd) from a depth of 14 feet bgs. Groundwater monitoring wells installed downgradient of the former tank pit contained a concentration of 400 µg/L TPHd during the last monitoring event in 1995.

Based upon our recent review of the case file, we have identified data gaps that should be addressed before ACEH can consider case closure. We request that you address the following technical comments, provide us with the information requested, perform the proposed work, and send us the technical reports described below.

#### **TECHNICAL COMMENTS**

1. **Contaminant Source Area Characterization (Corporation Yard)** – As stated above, the maximum soil contamination remaining from the Corporation Yard UST was 2,100 mg/kg TPHg and 21 mg/kg benzene at 16 ft bgs. Boring EB-2 is located immediately adjacent to the Corporation Yard building but vapor intrusion has not been evaluated. In addition, TPHg was detected at concentrations of 240 mg/kg from a depth of 21 feet bgs in EB-2. No deeper samples were analyzed from this boring leaving the vertical extent of

contamination undefined in the source area. By the date requested below, please submit a work plan to define the vertical extent of contamination in the source area soil and groundwater and conduct vapor intrusion evaluation.

2. **Contaminant Source Area Characterization (Toyon Meadow)** – Elevated concentrations of TPHd were detected in soil from the area near the former UST pit. Samples collected from B-8 contained a maximum concentration of 11,000 mg/kg TPHd from a depth of 14 feet bgs and no groundwater sample was collected from this boring. No deeper samples were obtained from this location and no follow up investigation was performed to further investigate the extent of contamination as requested previously by ACEH. Please submit a work plan to evaluate the vertical extent of contamination in soil, the current soil concentrations and the groundwater concentrations in the area adjacent to the Toyon Meadows UST pit and Boring B-8 by the date requested below. Please ensure that naphthalene analysis is performed in areas of concern that formerly utilized diesel.
  
3. **Well Status Information Request** – ACEH performed a site visit to review current conditions at both the Corporation Yard and Toyon Meadow. ACEH was told that all Corporation Yard wells remain intact. However, the wells at Toyon Meadow appear to be abandoned. ACEH does not have a well destruction report for these wells. Please provide information on the well destruction for the wells at Toyon Meadow. In addition, the water supply well that existed on-site appears to no longer be in use. Please research the Department of Water Resources (DWR) files to see if the well was properly abandoned. Please include this information in the work plan requested below.

### **TECHNICAL REPORT REQUEST**

Please submit technical reports to ACEH (Attention: Barbara Jakub), according to the following schedule:

- **June 1, 2009** – Soil and Water Investigation Work Plan

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If you have any questions or concerns regarding this correspondence or your case, please call me at (510) 639-1287 or send me an electronic mail message at [barbara.jakub@acgov.org](mailto:barbara.jakub@acgov.org).

Sincerely,

Barbara J. Jakub, P.G.  
Hazardous Materials Specialist

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

cc: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (Sent via E-mail to: [lgriffin@oaklandnet.com](mailto:lgriffin@oaklandnet.com))  
Donna Drogos, ACEH (Sent via E-mail to: [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org))  
Barbara Jakub, ACEH (Sent via E-mail to: [barbara.jakub@acgov.org](mailto:barbara.jakub@acgov.org))  
GeoTracker  
File

# 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/](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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> July 20, 2010
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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](mailto: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](mailto: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.