

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION
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July 24, 2008

Mrs. Wilma Alders
3356 Betty Lane
Layfayette, CA 94549

Subject: Fuel Leak Case No. RO0000201 and Geotracker Global ID T0600101109, Hydraulic Electro Service, 5812 Hollis St., Emeryville, CA

Dear Ms. Wilma Alders:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the August 29, 2006 correspondence with methyl tertiary butyl ether (MTBE) results and the three groundwater monitoring results reports. In the August 29, 2006 letter Mrs. Alders requests case closure referring to a letter from November 10, 1999 from ACEH which states that the soil and/or groundwater must be analyzed for methyl tertiary butyl ether (MTBE). The well was analyzed for MTBE seven years after the ACEH letter and the results were below the detection limit. During our recent review of the case, ACEH has identified data gaps. Also, it has come to our attention that additional investigation(s) was performed at the site and additional data is available. However, this data has not been submitted to us. Also, the site is apparently planned for redevelopment. Therefore, ACEH cannot consider case closure for the subject site at this time. This decision to deny closure is subject to appeal to the State Water Resources Control Board (SWRCB), pursuant to Section 25299.39.2(b) of the Health and Safety Code (Thompson-Richter Underground Storage Tank Reform Act - Senate Bill 562). Please contact the SWRCB Underground Storage Tank Program at (916) 341-5851 for information regarding the appeals process.

We request that you address the following technical comments, and send us the reports and information described below.

TECHNICAL COMMENTS

1. **Additional Investigations at the Site.** A map from Kleinfelder was provided for the site which appears to have four sample locations S1 through S4 and areas of marked as 'Trailer Oil Storage' and 'Batteries'. ACEH does not have results for these samples in a report nor do we have a report which talks about the other identified areas of concern. From a May 13, 2008 phone conversation with Treadwell & Rollo's Eric Morita, ACEH understands that these areas will be investigated under the lead of either the City of Emeryville or the Department of Toxic Substances Control (DTSC). If your investigation includes analytes for petroleum hydrocarbons and or oxygenates, the results may help define the extent of the petroleum hydrocarbon contamination at the site, since only one well was installed at the site in the presumed downgradient direction. Also, your additional investigation(s) may potentially provide data to address the other technical comments in this letter. Please include a graphic showing petroleum hydrocarbon and oxygenate results in soil and groundwater across the

entire property. Also include tables with soil and groundwater results from this and previous sampling events. Ensure that depths are provided for soil samples and if available for groundwater data. Provide this information in the additional information report requested below.

2. **Petroleum Hydrocarbons Left-in-Place.** During the initial tank excavation, a sheen was reported on the water in the tank pit and elevated diesel and petroleum hydrocarbons were reported in the water sample collected from the tank pit including 90,000 micrograms per liter ($\mu\text{g/L}$) total petroleum hydrocarbons as diesel (TPHd), 2,300 $\mu\text{g/L}$ total petroleum hydrocarbons as gasoline (TPHg), and 100 $\mu\text{g/L}$ benzene. No additional information is available on whether the water with a reported sheen was pumped out of the tank pit and the source area was not characterized, we request that you investigate whether there is residual petroleum hydrocarbon or oxygenate contamination in the source area. The depth of the groundwater contamination has not been defined. Please submit a work plan that investigates if there is residual contamination in the tank pit, the depth of the groundwater contamination in the area of the former diesel tank pit and resample the groundwater monitoring well for the constituents below.
3. **Representative Groundwater Samples.** Treadwell and Rollo reported that they do not know the depth to water at the site. Since groundwater has not been monitored at the site, ACEH is unsure if the well screen is submerged and if groundwater data is representative. Please redevelop and sample the well for the constituents below. Include the data obtained from this monitoring event in a table with all previous groundwater monitoring data in the report requested below. Please analyze for the following constituents: TPHg and TPHd by EPA Method 8015M, benzene, toluene, ethylbenzene, toluene, xylenes, MTBE, ethyl tertiary butyl ether (ETBE), di-isopropyl ether (DIPE), tertiary amyl methyl ether (TAME), tert butyl alcohol (TBA), ethylene dibromide (EDB), ethylene dibromide (EDB), and 1,2-dichloroethane (1,2-DCA) by EPA Method 8260.
4. **Regional Geologic and Hydrogeologic Setting.** A description of the regional and local geologic and hydrogeologic setting is needed for the site. Please include a concise narrative discussion of the regional geologic and hydrogeologic setting in the work plan requested below. Include a list of technical references you reviewed. Include a concise discussion of the on-site geology, hydrogeology, release history, and source zone. Please include a site summary of all remediation and investigations that were performed at the site.
5. **GeoTracker Compliance** – A review of the State Water Resources Control Board's (SWRCB) GeoTracker website indicates the site has not been claimed, rendering the site to non-compliance status. 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. Also, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude to sub-meter accuracy using NAD 83. A California licensed surveyor may be required to perform this work. Additionally, pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3893, 3894, and 3895, beginning July 1, 2005, the successful submittal of electronic information (i.e. report in PDF format) shall replace the requirement for the submittal of a paper copy. Please claim

your site and upload all future submittals to GeoTracker and ACEH's ftp server by the date specified below. Electronic reporting is described below.

6. **Underground Storage Tank Cleanup Fund** – Site investigation/site cleanup costs may be reimbursable from the California Underground Storage Tank Cleanup Fund. The application and additional information is available at the State Water Resources Control Board's website at http://www.waterboards.ca.gov/water_issues/programs/ustcf/. Please be aware that reimbursement monies are contingent upon maintaining compliance with directives from ACEH.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Barbara Jakub), according to the following schedule:

- **September 24, 2008** – Additional Information Report and Work Plan
- **October 24, 2008** – Groundwater Monitoring Report

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.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml).

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.

If you have any questions, please call me at (510) 639-1287 or send me an electronic mail message at barbara.jakub@acgov.org.

Sincerely,



Barbara Jakub, P.G.
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Eric Morita, Treadwell & Rollo, Inc., 501 14th St., 3rd Floor, Oakland, CA 94612
Donna Drogos, ACEH
Barbara Jakub, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, 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

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- 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)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

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 dehloptoxic@acgov.org
 - or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
 - 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 and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - 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 dehloptoxic@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 at 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)