



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

February 11, 2015

Caltrans
111 Grand Avenue
Oakland, CA 94612
Attn: Mr. Bahram Sazegar
(Sent via E-mail to: bahram.sazegar@dot.ca.gov)

Subject: ADDITIONAL INVESTIGATION WORK PLAN, Fuel Leak Case No. RO0000225 and GeoTracker Global ID T0600101696, Caltrans Oakland Maintenance Station, 555 Hegenberger Road, Oakland, CA 94621

Dear Mr. Sazegar:

Thank you for the recently submitted document entitled, *Additional Investigation Workplan* (Work Plan), dated December 16, 2014, which was prepared by Geocon Consultants, Inc. (Geocon) for the subject site. Alameda County Environmental Health (ACEH) staff has reviewed the case file including the above-mentioned work plan for the subject site. The Work Plan proposes to address four data gaps identified for the site.

Data gaps the Work Plan proposes to address are:

1. A determination if shallow groundwater is in a confined condition by means of advancing three temporary cluster wells, with each cluster consisting of five wells having varying depths from 3 to 15 feet below the ground surface;
2. Further delineation of the lateral impacts to groundwater by means of advancing four borings for the recovery of grab groundwater samples;
3. Residual source evaluation in the vicinity of the former UST pit, consisting of the advancement of four borings outside of the former tank pit excavation boundary and an additional soil boring advanced through the former tank pit for the recovery of soil and grab groundwater samples; and
4. An evaluation potential groundwater impact to the adjoining downgradient wetland by means of advancing a three boring transect for the recovery of grab groundwater samples. The proposed location of the transect is between the wetland and the former underground storage tanks (USTs).

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. Please provide 72-hour advance

written notification to this office (e-mail preferred to: keith.nowell@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. The referenced work plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests several modifications to the scope of work as addressed below:

- A. Grab Groundwater Sampling** – The Work Plan states groundwater samples will be extracted by means of polyethylene tubing fitted with a check valve. ACEH is of the opinion this extraction method may cause undue agitation of the groundwater, potentially reducing volatilizing volatile organic compound (VOC) concentrations. ACEH requests the use of a peristaltic pump be used for groundwater sample recovery.
- B. Silica Gel Cleanup** – The Work Plan states grab groundwater samples collected during the investigation of Items 1, 2, and 4 presented above will be analyzed for TPH as diesel (TPHd) by EPA test method 8015B and that the TPHd analysis would be performed using silica gel clean up. Diesel degradation produces both polar and non-polar byproducts. To remain consistent with Regional Water Quality Control Board (RWQCB) recommendations, ACEH requests that the TPHd analysis be performed using EPA test method 8015B both with and without silica gel clean up.

Additionally, Item 3 above does not indicate if using silica gel clean up would be performed for the TPHd analysis. Please perform EPA test method 8015B both with and without silica gel clean up on the TPHd samples recovered from the UST excavation are investigation.

- C. Borehole Security** – The Work Plan states the boreholes advanced for Item 1 above will be left open for three days. The Work Plan does not indicate how these borings will be secured for the duration prior to the sampling of these wells. Please elaborate in an email (attention Keith Nowell) prior to implementation of this Work Plan what measures will be taken to secure the open borings from surface water intrusion and/or vandalism prior to sampling. Note that these borings are contingent on Alameda County Public Works Agency, the well permitting agency, for approval of open boreholes
- D. Soil Sampling Protocols** – The Work Plan states soil samples will be collected every 5 feet and at depths where obvious petroleum impacts are observed for Item 3 above. ACEH requests soil samples be collected and analyzed at maximum intervals of five feet, areas of obvious contamination, the soil/groundwater interface, and at significant changes in lithology. If staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number of soil samples from this interval requested to be submitted for laboratory analyses to characterize the fuel hydrocarbon concentrations within this interval. Please ensure that the analytical results define the vertical extent of TPH impacts at these locations.
- E. Soil Bore Numbering** – The Work Plan states three borings (SB18 to SB20) will be advanced at the approximate location as shown of Figure 5. The borings depicted on Figure 5 are labeled SB-23 to SB25. Please contact ACEH by email (attention Keith Nowell) with a revised figure for our review should these three borings be incorrectly identified on Figure 5.

- F. Analytical Testing** – The State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) requires collection of soil samples from within the 0- to 5-foot and 5- to 10-foot zones to satisfy the LTCP Media Specific Criteria for Direct Contact and Outdoor Air Exposure. ACEH requests that excavation perimeter soil samples be collected at two different depths from within the 0- to 5-foot interval measured from below the ground surface (bgs), and in addition to at least one from the one 5- to 10-foot zone, and be consistent with Item D above. ACEH requests naphthalene be added to the scope of analysis presented in the Work Plan,

Additionally, the Work Plan also indicates that analysis of benzene, toluene, ethylbenzene, and xylenes (BTEX) will be performed by EPA test method 8021B for Item 4 above. The presence of non-BTEX VOCs have been detected in groundwater at the site. Therefore, ACEH requests that the full suite of VOCs be analyzed by EPA test method 8260B for the groundwater samples recovered from this area. Total petroleum hydrocarbons (TPH) as gasoline (TPHg) may also be reported by this scan.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Keith Nowell), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **March 6, 2015** – Email Correspondence addressing Item C and Item E in the Technical Comments section above.
- **June 12, 2015 – Soil and Groundwater Investigation Report** (file name: RO0000225_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>.

Thank you for your cooperation. ACEH looks forward to working with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Respectfully,

Keith Nowell
Hazardous Materials Specialist

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

cc: John Love, Geocon Consultants, Inc., 6671 Brisa Street, Livermore, CA 94550-2505
(Sent via E-mail to: love@geoconinc.com)

Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA
94612-2032 (Sent via E-mail to: lgriffin@oaklandnet.com)

Dilan Roe, ACEH (Sent via E-mail to: dilan.roe@acgov.org)

Keith Nowell, ACEH (Sent via E-mail to: keith.nowelli@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/).

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.

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.