



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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June 13, 2016

Caltrans
111 Grand Avenue
Oakland, CA 94612
Attn: Mr. Ray Boyer
(Sent via electronic mail to: ray.boyer@dot.ca.gov)

Subject: Request for Work Plan, Fuel Leak Case No. RO0000225 and GeoTracker Global ID T0600101696, Caltrans Oakland Maintenance Station, 555 Hegenberger Road, Oakland, CA 94621

Dear Mr. Boyer:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the recently submitted document entitled *Additional Soil and Groundwater Investigation Report (SWI)* dated June 10, 2015, and prepared by Geocon Consultants, Inc. (Geocon) for the subject site. The review was performed in conjunction with the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP).

The SWI was performed to address data gaps discussed in our meeting held on November 18, 2014. The data gaps discussed include whether more than one groundwater-bearing zone exists beneath the investigation area in order to address the LTCP Media Specific Petroleum Vapor Intrusion to Indoor Air criteria and assess potential impacts to sensitive receptors. Soils samples were also collected in the 0- to 5-foot and 5- to 10-foot zones for evaluation with the LTCP Media Specific Direct Contact and Outdoor Air Exposure criteria.

The SWI presents Geocon's findings, based on data collected through the advancement of 21 soil bores and the collection of soil and/or grab-groundwater (GGW) samples submitted for laboratory analysis. Based on the findings of the SWI, Geocon recommends the physical removal of impacted soil and groundwater in the vicinity of SB1, SB2, SB3, SB-16, BC-1, BC-2, MW-3 and MW-4.

Geocon also concluded results of groundwater samples collected from the area between the site and the tidal channel, indicate that petroleum hydrocarbons released from the former Caltrans USTs do not pose a threat to aquatic habitat in the abutting tidal channel.

ACEH generally concurs with the proposed scope of work and requests that you address the following technical comments, and send us the technical reports described below.

TECHNICAL COMMENTS

- 1. Water Bearing Zones** – The SWI identified a shallow unconfined groundwater zone at the site with depth to water typically ranging from 4 to 6.5 feet below the ground surface (bgs). Depth to water (DTW) appears to be locally influenced by the presence of sand gravelly fill material. Discontinuous sand and gravel layers up to 4 feet thick were observed in the soil bores. These coarse grain layers may result in localized confined or semiconfined

conditions. Based on the data collected with the SWI in addition to the groundwater monitoring well data, which reports DTW as shallow as 2.75 feet bgs, there does not appear to be a bioattenuation zone to meet the LTCP Media Specific Petroleum Vapor Intrusion to Indoor Air criteria for Scenarios 1, 2, 3, or 4b.

- 2. Soil Removal** - Direct evidence of free phase product (FP) was observed in soil bores BC-1, BC-2, SB-16, BH-2, BH-3, and BH-6. Indirect evidence of FP has been reported for SB-16, MW-1 and MW-3. Additionally, the GGW concentration of total petroleum hydrocarbons (TPH) as gasoline (TPHg) for SB1 are reported at 9,400 micrograms per liter ($\mu\text{g/L}$); and at 15,000 $\mu\text{g/L}$ TPHg and 1,600 $\mu\text{g/L}$ benzene for SB2; and 12,000 $\mu\text{g/L}$ TPHg and 2,000 $\mu\text{g/L}$ benzene for SB3. These concentrations exceed the Direct Exposure Environmental Screening Levels (ESLs). In addition, the reported benzene concentrations exceed Scenarios 1, 2, and 3 of the LTCP Media Specific Petroleum Vapor Intrusion to Indoor Air and the Commercial / Industrial ESL for Groundwater Vapor Intrusion for Shallow Groundwater.

Therefore, ACEH requests the preparation of an interim remedial action work plan to address the removal of soil defined by the afore-mentioned soil bores by the date specified below.

- 3. Potential Impacts to Sensitive Receptors** - It is unclear to ACEH that the assessment to the adjacent tidal wetland is complete. TPHd was reported at concentrations of 620 $\mu\text{g/L}$ (with silica gel clean up- SGC) and 1,300 $\mu\text{g/L}$ in SB-25 GGW without SGC. The Aquatic Habitat Goal ESL is 640 $\mu\text{g/L}$.

The San Francisco Bay Region, Regional Water Quality Control Board (SFBR-RWQCB) does not utilize SGC when evaluating concentrations of TPHd and TPHmo with the ESLs. For consistency, ACEH follows the SFBR-RWQCB lead when evaluating cases having TPHd and TPHmo concentrations with regard to the ESLs.

Therefore, ACEH requests additional evaluation of impacts to the tidal wet land. Please prepare a work plan to evaluate ecological risks to the wetland by the date specified below.

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:

- **August 12, 2016** – Ecological Risk Evaluation Work Plan (file name: RO0000225_WP_R_yyyy-mm-dd)
- **August 12, 2016** – Interim Remedial Action Work Plan (file name: RO0000225_IRAP_WP_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.

Caltrans – Attn: Mr. Ray Boyer
RO0000225
June 13, 2016, Page 3

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: Ramin Behani, Caltrans, 111 Grand Avenue, Oakland, CA 94612
(Sent via electronic mail to: ramin.behani@dot.ca.gov)

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

Dilan Roe, ACEH (Sent via electronic mail to: dilan.roe@acgov.org)
Keith Nowell, ACEH (Sent via electronic 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.