



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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August 17, 2016

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

Subject: Ecological Risk Evaluation Work Plan Review, 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 Department of Environmental Health (ACDEH) staff has reviewed the case file including the recently submitted document entitled *Ecological Risk Evaluation Workplan* (EWP) dated July 15, 2016 and prepared by Geocon Consultants, Inc. (Geocon) for the subject site. The EWP was prepared at the request of ACDEH in our letter dated June 13, 2016, which provided comments on a previous Geocon document entitled *Additional Soil and Groundwater Investigation Report* (SWI) dated June 10, 2015. Based on our review of the SWI, ACDEH concluded the assessment to the adjacent tidal wetland is incomplete as total petroleum hydrocarbons (TPH) as diesel (TPHd) was reported at a concentration of 1,300 µg/L in soil bore SB-25, located adjacent to the wetland, exceeding the 640 µg/L TPHd Aquatic Habitat Goal Environmental Screening Level (ESL).

In order to assess the ecological risk, the EWP proposes to collect soil and grab groundwater (GGW) samples from eight temporary boring locations, with soil samples collected at depths of 5, 10 and 15 feet (if groundwater is not encountered first). In order to address sample methodology discrepancies, GGW samples will be recovered at each boring location from an open borehole and using a Hydropunch sampler. Soil and GGW samples will be analyzed for TPHd and motor oil (TPHmo) without using silica gel cleanup (SGC).

ACDEH generally concurs with the proposed scope of work. The proposed scope of work may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. Submittal of a revised EWP is not required unless an alternate scope of work outside that described in the EWP and technical comments below is proposed. Additional data may be available that ACDEH is not aware of, or may not have been submitted, and therefore has not been incorporated in to ACDEH's file review. If additional data is made available, the data can be incorporated in future reviews.

TECHNICAL COMMENTS

- 1. Soil Sample Collection** – ACDEH recommends that soil samples be collected and analyzed from within the 0- to 5-foot and 5- to 10-foot intervals as measured from the ground surface, 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 should be submitted for laboratory analyses to characterize the fuel hydrocarbon concentrations within this interval.

2. **Soil Bore Logs** – EWP *Section 3.0- Report Preparation* does not specify that soil bore logs will be prepared and included in the report. ACDEH requests the preparation and inclusion of soil bore logs in the soil and groundwater investigation report requested below. Please include photoionization detector (PID) measurements on the bore logs. Additionally, ACDEH requests submittal of each bore log to the California State Water Resources Control Board (SWRCB) GeoTracker website as a GEO_BORE file.
3. **Grab Groundwater Sample Collection** – ACDEH is in general agreement with the rationale presented in the EWP for the collection of GGW samples from the open borehole through a temporary well casing and with a Hydropunch sampler in order to evaluate the source of TPH concentrations reported in groundwater.
4. **Silica Gel Clean Up** – San Francisco Bay Regional Water Quality Control Board (SFBR-RWQCB) *Petroleum Metabolites- Literature Review and Assessment Framework, a Technical Resource Document* (SFBR-RWQCB, June 27, 2016) states the purpose of comparison of duplicate samples processed with and without SGC is to assess the relative degree of biodegradation. Therefore, ACDEH requests submittal of selected soil and GGW samples for analysis both with and without SGC. Please submit a sufficient number of soil samples consisting of both fill and bay mud and GGW samples representing both open borehole and Hydropunch methodologies for the SGC/ no SGC biodegradation evaluation.
5. **Scope of Analysis** – GGW samples collected from soil bores SB-23 and SB-24 were collected using Hydropunch sampling methodology. Both samples were reported to contain the volatile organic compound (VOC) 1,1-dichloroethene (1,1-DCE). The sample from SB-23 was also reported to contain another VOC, 1,1-dichloroethane (1,1-DCA). Therefore, ACDEH requests the analysis of samples using the full suite of VOCs by EPA Test Method 8260.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH ftp site (Attention: Keith Nowell), and to the SWRCB's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **October 17, 2016** – Ecological Risk Evaluation 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>.

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Thank you for your cooperation. ACDEH 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
ACDEH 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, ACDEH (Sent via electronic mail to: dilan.roe@acgov.org)
Keith Nowell, ACDEH (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.