

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY, SUITE 250
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

January 4, 2017

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

Subject: Interim Remedial Action Workplan Addendum Report 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 *Interim Remedial Action Workplan Addendum* (WPA) dated December 9, 2016, and prepared by Geocon Consultants, Inc. (Geocon) for the subject site. The WPA was prepared to address comments made by ACDEH in our letter dated October 4, 2016 regarding the document submittal entitled *Interim Remedial Action Workplan* dated August 5, 2016, also prepared by Geocon.

Based on ACDEH staff review of the referenced documents and of the case file we generally concur with the recently proposed scope of work, provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. We request that you address the following technical comments, submit the requested document, and upon ACDEH approval, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

In the WPA, Geocon responds to the eight technical comments presented in our October 4, 2016 letter.

Re Technical Comment 1: ACDEH's first comment requested the rationale for destroying well MW-5 as it is located outside of the areas of proposed excavation.

As presented by Geocon, the rationale for abandoning MW-5 is the well is constructed with a well screen interval of five (5) to 20 feet. Based on groundwater sample results collected from borings SB15 and SB17 in April 2015, groundwater below 16 feet appears relatively unaffected by the petroleum hydrocarbon release; therefore, the existing well screen length is too long. Accordingly, groundwater sample results collected from the site well may be diluted with cleaner underlying groundwater and not representative of shallow groundwater conditions.

ACDEH Response: While ACDEH generally agrees with shorter screen lengths, ACDEH notes that groundwater was first encountered in borehole MW-5 at a depth of 18 feet below the ground surface (bgs) while drilling. Groundwater rose to 6.68 feet within two (2) weeks of the well's installation, as measured during the first groundwater monitoring event. As the bottom of the well is screened in sandy gravel, a more permeable layer than overlying layers, the well may be monitoring the source of the confined, contaminated groundwater. Alternatively, the source of groundwater contamination is at a shallower depth and dilution may be occurring.

Therefore, ACDEH recommends a shallower-screened well be proposed in the vicinity of MW-5 in the Well Installation Work Plan requested below. Following a review of the laboratory analysis report for the shallower-screened well, a determination will be made regarding the destruction of well MW-5.

Re Technical Comment 2: ACDEH requested clarification regarding excavation depth and backfill specifications. Geocon is of the opinion that the bulk of the contaminant mass beneath the site is within relatively porous channels emanating from the former underground storage tank (UST) excavation area and located between 4 and 8 feet below ground surface (bgs). Therefore, the depth of excavation is anticipated to be between 4 and 10 feet.

ACDEH Response: As Geocon also states it is not known where the impacted soils are precisely located in the subsurface, ACDEH suggests using an excavation depth of at least 8 feet.

Alternatively, please provide an evaluation of the vertical distribution of contaminated material in the proposed areas of excavation. Provide the discussion of the evaluation of the vertical distribution of contaminated material in the Response to Comments requested below.

Re Technical Comment 3: ACDEH requested elaboration on the number and depth of excavation confirmation soil samples. Geocon response stated minimum of 5 soil samples would be collected from each excavation area, with sample collection every 20 linear feet. Geocon also reported it would collect soil samples from the bottom of each excavation area on approximately 25-foot centers to demonstrate that the vertical extent of impacts has been adequately remediated. Geocon anticipated the excavations would be no deeper than 10 feet and that all soil samples collected during the confirmation soil sampling will be collected within the 0- to 5-foot and 5- to 10-foot sample intervals.

ACDEH Response: ACDEH generally concurs with the confirmation sample density.

Re Technical Comment 4: ACDEH requested the scope of analysis for soil sample include naphthalene. Geocon agrees with the addition of naphthalene.

ACDEH Response: ACDEH has no additional comments.

Re Technical Comment 5: ACDEH requested clarification for the quantity of groundwater to be removed from the excavation. Geocon responded that the 50,000 gallon quantity was arrived at for budgetary purposes and that anticipates that this should be a sufficient volume to effectively remove free product that may be present on the water table surface in preparation of the chemical oxidation remediation effort. Geocon added that the effectiveness of the proposed chemical oxidation process may be compromised if free product is present when the oxidation solution is introduced into the groundwater that has ponded in the excavation area.

ACDEH Response: Please address the manner in which a determination will be made regarding the presence of free product, e.g.: will it be made solely on field observations or will secondary evidence also be used in making the determination. Please provide your comments in the Response to Comments document requested below.

Re Technical Comment 6: ACDEH is in general agreement that sampling of the existing monitoring well network prior to the destruction of groundwater monitoring wells MW-1, MW-2 and MW-4 may provide inconsistent results with the network of replacement wells, should the replacement wells be screened at different intervals.

ACDEH Response: However, ACDEH is of the opinion that the groundwater data will provide a secondary line of evidence when evaluating the excavation pit grab-groundwater (GGW) sample concentrations and water samples collected from the replacement well network.

Therefore, ACDEH requests the existing well network be sampled prior to the removal of wells MW-1, MW-2 and MW-4, in addition to the collection of GGW samples from the excavation pits.

Re Technical Comment 7: ACDEH requested the scope of analysis for soil sample include naphthalene. Geocon agrees with the addition of naphthalene. Based on the presence of ACDEH requested the scope of analysis for soil sample include naphthalene. Geocon agrees with the addition of naphthalene.

ACDEH Response: ACDEH has no additional comments.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

Please note that ACDEH has updated its Attachment 1 with regard to report submittals to ACDEH. ACDEH will now be requiring a Submittal Acknowledgement Statement, replacing the Perjury Statement, as a cover letter signed by the Responsible Party (RP). The language for the Submittal Acknowledgement Statement is as follows:

"I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the SWRCB's GeoTracker website."

Please make this change to your submittals to ACDEH.

TECHNICAL REPORT REQUEST

Please submit reports to Alameda County Environmental Health (Attention: Keith Nowell), and upload technical reports to the ACDEH 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:

- **February 3, 2017**– Response to Comments (file to be named: RO0000225_WP_ADDEN_R_yyyy-mm-dd).
- **60 days following Response to Comments Approval** – Interim Remedial Action Report (file to be named: RO0000225_IR_R_yyyy-mm-dd).
- **60 days following Interim Remedial Action Report submittal** – Work Plan for Well Installation (file to be named: RO0000225_WP_R_yyyy-mm-dd).

Should you have any questions, please contact me at (510) 567--6764 or send me an electronic mail message at keith.nowell@acgov.org.

Sincerely,

Keith Nowell, PG, CHG
Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements/Obligations and Electronic Report Upload (ftp) Instructions

Mr. Ray Boyer
RO0000225
January 4, 2017, Page 4

cc: Bahram Sazegar, Office of Environmental Engineering, Division of Environmental Planning and Engineering, California Department of Transportation-District 4, 111 Grand Avenue, Oakland, CA 94623 (*Sent via electronic mail to:* bahram.sazegar@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)

Paresh Khatri, ACDEH, (*Sent via electronic mail to* paresh.khatri@acgov.org)

Keith Nowell, ACDEH, (*Sent via electronic mail to* keith.nowell@acgov.org)

Geotracker, Electronic 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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) 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 File Transfer Protocol (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 SCP 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 (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/) for more information on these requirements.

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the SWRCB's GeoTracker website." 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 6731, 6735, and 7835) 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 licensed 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 case meet this requirement. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, late 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 SCP)	REVISION DATE: December 1, 2016
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions


The Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) 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 acknowledgement 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) Open File Explorer using the Windows  key + E keyboard shortcut.
 - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) On the address bar, type in ftp://alcoftp1.acgov.org.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
 - d) Click Log On.
 - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - f) 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.