



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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September 9, 2011

Chris Wilson (Sent via E-mail to: Chris_Wilson@dot.ca.gov)
Caltrans
111 Grand Avenue
Oakland, CA 94612

Subject: Work Plan Denial for Fuel Leak Case No. RO0000250 and GeoTracker Global ID T0600102155, Caltrans, 6th St. and Castro Street, Oakland, CA 94612

Dear Mr. Wilson:

We have received the recently submitted document entitled, *Soil Gas Sampling and Analysis Plan* dated June 2, 2011, which was prepared by Northgate Environmental Management, Inc. for the subject site. Alameda County Environmental Health (ACEH) staff has reviewed the case file including the above-mentioned work plan for the above-referenced site. The work plan proposes analyzing soil vapor in the area above the total petroleum hydrocarbons as gasoline (TPHg) plume.

The scope of work presented in the work plan does not appear adequate to address all of the concerns at the site and cannot be approved as presented. ACEH requests that you address the following technical comments and send us a work plan addendum consisting of a revised sample location map as requested below.

TECHNICAL COMMENTS

1. **Soil Vapor Characterization** – ACEH requests that a closer spacing be used for your vapor sampling points in the area with the maximum benzene concentrations in groundwater (MW-2, OAK-1, and OAK-2). We request that you install additional vapor points in the area of the estimated extent of soil contamination and evaluate vapor concentrations in the area of the former Durham Farm Creamery near the former underground storage tank (UST). Please submit a map for sample location approval by the date requested below, perform the work after approval of the locations and submit the soil vapor investigation report.

Please include soil vapor sampling points near MW-4 to evaluate trichloroethylene (TCE) that was detected in groundwater at a concentration of 0.92 µg/L, in the areas of the former dry cleaning facilities (Sunshine Laundry and Sunrise Laundry) and former Painter's Storage since these areas do not appear to have been fully evaluated for solvent contamination. Provide a discussion of the chemicals that were used at the laundry facilities in the site investigation plan.

Please include analytical for TCE naphthalene, oxygen, carbon dioxide and methane in your analysis at all vapor sampling locations in addition to your proposed analytes.

2. **Surface Features** – There are features on the map marked “fill mounds”. Please describe these features in detail, evaluate if they are a potential source for volatile organics and propose soil vapor sampling points in these locations, if warranted, in the site investigation report requested below. Also include the location of the businesses identified in the Phase I reports on your map with the location of all borings, wells and the water supply well.
3. **Preferential Pathway Study** – The purpose of the preferential pathway study is to locate potential migration pathways and conduits and determine the probability of the plume encountering preferential pathways and conduits that could spread contamination. We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for vertical and lateral migration that may be present in the vicinity of the site.

Discuss your analysis and interpretation of the results of the preferential pathway study (including the detailed well survey and utility survey requested below) and report your results in the report requested below. The results of your study shall contain all information required by California Code of Regulations, Title 23, Division 3, Chapter 16, §2654(b).

a. Utility Survey

An evaluation of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s) is required as part of your study. Please include maps illustrating the location and depth of all utility lines and trenches within and near the site (including the utility lines in the street and any laterals leading from the site) and plume areas(s) as part of your study.

b. Well Survey

The preferential pathway study shall include a detailed well survey of all wells (monitoring and production wells: active, inactive, standby, decommissioned (sealed with concrete), abandoned (improperly decommissioned or lost); and dewatering, drainage, and cathodic protection wells) within a ¼-mile radius of the subject site. Include a discussion of the construction and status of the “groundwater production well” located on the ENGEO map in the Soil Investigation Report requested below.

4. **Chemicals Used at Laundry Facilities** – Two laundry facilities were historically located on the property. Please provide a discussion of the potential chemicals that could have been used and discuss if appropriate samples have been collected for those chemicals in the site investigation report requested below.
5. **Groundwater Contaminant Plume Monitoring** – Groundwater monitoring has not been conducted since 2009. Please initiate one round of groundwater monitoring for the following analytes: total petroleum hydrocarbons as gasoline (TPHg), TPH as diesel (TPHd) benzene, toluene, ethylbenzene, xylenes (BTEX), 1, 2-dichloroethane (EDC), ethylene dibromide (EDB), naphthalene, and volatile organic compounds by EPA Method 8260. Provide the results of the monitoring in the report requested below.

Mr. Wilson
RO0000250
September 9, 2011, Page 3

NOTIFICATION OF FIELDWORK ACTIVITIES

Please provide ACEH with at least three (3) business days notification prior to conducting the fieldwork preferably by e-mail to barbara.jakub@acgov.org.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Barbara Jakub), according to the following schedule:

- **September 19, 2011** –Work Plan Addendum
- **November 30, 2011** – Soil Investigation Report

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 639-1287 or send me an electronic mail message at barbara.jakub@acgov.org.

Sincerely,

Barbara J. Jakub, P.G.
Hazardous Materials Specialist

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

cc: Gopal Nair, City of Oakland, Environmental Services Division, 250 Frank Ogawa Plaza, Suite 5301, CA 94612 (*Sent via e-mail: gnair@oaklandnet.com*)
Dennis Laduzinsky, Northgate Environmental Management, Inc., 300 Frank Ogawa Plaza, Suite 510, Oakland, CA 94612 (*Sent via e-mail to: dennis.laduzinsky@ngem.com*)
Anya Starovoytov, Northgate Environmental Management, Inc., 300 Frank Ogawa Plaza, Suite 510, Oakland, CA 94612 (*Sent via e-mail to: anya.starovoytov@ngem.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*)
Donna Drogos, ACEH (*Sent via E-mail to: donna.drogos@acgov.org*)
Barbara Jakub, ACEH (*Sent via E-mail to: barbara.jakub@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: July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 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.