



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

September 4, 2014

Mark Tussing
Owens-Brockway Container, Inc.
Four O-I Plaza, One Michael Owens Way
Perrysburg, OH 43551-2999
(Sent via E-mail to: Mark.Tussing@o-i.com)

Subject: Conditional Approval for Groundwater Treatment Biobarrier Design for Fuel Leak Case No. RO0000289 and GeoTracker Global ID T0600102223, Owens Brockway Glass, 3600 Alameda Avenue, Oakland, CA 94601

Dear Mr. Tussing:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the most recently submitted document entitled, "*Groundwater Treatment Biobarrier Design*," dated August 13, 2014 (Design). The Design, which was prepared on your behalf by CKG Environmental, Inc., presents plans to inject oxygen into a series of injection wells along the southern boundary of the site. This Design is a modification of the groundwater treatment trench previously proposed in the "*Revised Corrective Action Plan*," dated January 17, 2014.

In correspondence dated March 10, 2014, ACEH conditionally approved interim remedial excavations in two areas of the site and requested the design of a groundwater treatment trench along the southern boundary of the site. The proposed excavations (Excavations C and E) were completed in June 2014. ACEH requests that a report presenting the results of the excavations be submitted **no later than November 3, 2014**.

The groundwater treatment biobarrier proposed in the Design is conditionally approved provided that the technical comments below are addressed during the installation and operation of the groundwater treatment biobarrier. We request that you implement the proposed actions along with the modifications requested below. Please present results from the installation and start-up of the groundwater treatment biobarrier in a Remedial System Installation and Operations Report **no later than March 15, 2015**.

TECHNICAL COMMENTS

1. **Pilot Borings.** The Design indicates that pilot borings will be advanced to provide vertical delineation for proposed monitoring wells MW-2R and MW-3R. The proposal to advance a pilot boring to a depth of 50 feet bgs in the source area (MW-2R) and to advance a pilot boring to a depth of 30 feet bgs for MW-3R is acceptable. The pilot borings are to be continuously sampled for logging and screening purposes. In order to provide information to help select the target intervals for the injection wells, we request that two pilot borings in addition to MW-3R be advanced along the proposed biobarrier. The two additional pilot borings are to provide information for designing effective injection wells. Therefore, the two additional pilot borings should be advanced at locations along the proposed biobarrier where stratigraphic information is currently limited. We suggest one pilot boring be located approximately midway between MW-3R and MW-7 and one pilot boring be located approximately midway between MW-6 and MW-7. Alternate locations may be proposed.

2. **Monitoring Well MW-3R.** We request that proposed monitoring well MW-3R be located midway between proposed injection wells IW-12 and IW-13 in order to monitor the effects of the injections outside the immediate vicinity of the injection wells.
3. **Baseline Sampling.** We request that one groundwater sampling event take place prior to operation of the injection wells to provide a baseline monitoring event. Please present the results in the Remedial System Installation and Operations Report requested below.
4. **Future Groundwater Monitoring.** The Design includes only two downgradient monitoring wells to assess the performance of the proposed biobarrier. Additional groundwater monitoring wells may be required at a future date dependent upon review of the initial monitoring results and operation of the biobarrier.
5. **GeoTracker Compliance** – A review of the State Water Resources Control Board's (SWRCB) GeoTracker website indicates that the "*Groundwater Treatment Biobarrier Design*," dated August 13, 2014 and the "*2014 Groundwater Monitoring Report*," dated February 28, 2014 were not uploaded to GeoTracker. Because this is a state requirement, ACEH requests that you submit these reports and required electronic submittals to the GeoTracker website. Electronic reporting is described in attachments to this correspondence.

Additional information regarding the SWRCB's GeoTracker website may be obtained online at http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/ and http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml) or by contacting the GeoTracker Help Desk at geotracker@waterboards.ca.gov or (866) 480-1028.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Jerry Wickham), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **November 3, 2014** – Remedial Excavation Report
File to be named: EX_R_yyyy-mm-dd RO289
- **March 15, 2015** – Remedial System Installation and Operations Report
File to be named: REM_R_yyyy-mm-dd RO289

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 ST system, and require your compliance with this request.

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If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org. Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Attachment: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

Christina Kennedy, CKG Environmental, Inc., P.O. Box 246, St. Helena, CA 94574 (*Sent via E-mail to: ckennedy@geologist.com*)

Bill Boscacci, Owens-Brockway Container, Inc., 3600 Alameda Avenue, Oakland, CA 94601

Jerry Wickham, ACEH (*Sent via E-mail to: jerry.wickham@acgov.org*)

GeoTracker, eFile

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.