

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
ALAMEDA, CA 94502
(510) 567-6700
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July 19, 2017

City of Oakland Public Works
Attn.: Mark Arniola
250 Frank H. Ogawa Plaza, Suite 4314
Oakland, CA 94612
(Sent via electronic mail to marniola@oaklandnet.com)

Subject: Conditional Work Plan Approval; Fuel Leak Case No. RO0000293 and GeoTracker Global ID T0600100375, City of Oakland Municipal Service Center, 7101 Edgewater Drive, Oakland, CA 94612

Dear Mr. Arniola:

Thank you for the recent submittal of the document entitled *Work Plan for Soil Gas Investigation (Work Plan)*, dated June 15, 2017 and prepared by Terraphase Engineering Inc. (Terraphase) for the subject case. Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the aforementioned document. The Work Plan was prepared at the request of ACDEH in our meeting with you and Kayleigh Lim of the City of Oakland, Diane Heinze of the Port of Oakland, and Andrew Romolo and Anna Behrens of Terraphase on May 31, 2017 and in our letter of the same date.

In our letter of May 31, 2017, ACDEH requested the following items:

- A.** Electronic submittal of information;
- B.** Groundwater monitoring; and
- C.** Work plan submittals in a phased approach for:
 - i. Soil vapor and groundwater investigation;
 - ii. MIP-UVOST investigation; and
 - iii. Soil and groundwater investigation.

Terraphase has submitted the Work Plan which addresses Item B and Item C. To address Item C(i) above, Terraphase is proposing to install 13 permanent soil vapor probes advanced to a depth of three feet below the ground surface (bgs) around the outer perimeter of buildings at the site. As stated, the proposed work will be performed in accordance with the DTSC guidance document entitled *Active Soil Gas Advisory (2011)*. Terraphase proposes to analyze the soil vapor samples for total petroleum hydrocarbons as gasoline (TPHg); benzene, toluene, ethylbenzene, and xylenes (collectively BTEX); and naphthalene; the fixed gases, methane, and helium. Due to shallow groundwater at the site, Terraphase has alternatively proposed the installation of soil vapor pins for the collection of sub-slab soil vapor should groundwater interfere with the collection of the soil vapor samples from the permanent soil vapor probes.

Seven groundwater monitoring wells were found to be inaccessible during the May 2017 groundwater monitoring event due to material stored over the well cover or by the well cover having been cemented. In addressing Item B, Terraphase proposes to gain access to these wells and include them in the next groundwater monitoring event.

ACDEH generally concurs with the proposed scope of work. The proposed work scope may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. ACDEH requests submittal of the technical reports described below.

TECHNICAL COMMENTS

- 1. Electronic Submittal of Information** – Since our meeting of May 31, 2017, two submittals have been made to the State Water Resources Control Board's (SWRCBs) GeoTracker website- a laboratory analysis data file (as an EDF) for a May 11, 2017 groundwater monitoring event, and the subject Work Plan (as a GEO_REPORT). Hence, the case remains out of compliance with state regulations. ACDEH requests a review of the GeoTracker case file and submittal of missing documentation to bring the case into compliance. Please provide ACDEH, Attention Keith Nowell, with a list of the documents submitted to GeoTracker by the date specified below.
- 2. Well Access** – Once made accessible, ACDEH requests an evaluation of the condition of each 'inaccessible' well be performed to determine if the well has been damaged or sufficiently compromised, requiring redevelopment, rehabilitation or replacement.
- 3. Guidance Document** – ACDEH requests the soil vapor study be performed in accordance with the more recent July 2015 guidance document entitled *Advisory- Active Soil Gas Investigations (Advisory)* prepared by California Environmental Protection Agency/ Department of Toxic Substances Control (Cal EPA / DTSC), and the Regional Water Quality Control Boards of the Los Angeles (LARWQCB) and San Francisco (SFRWQCB) regions.
- 4. Naphthalene Analysis** – In accordance with the Advisory, ACDEH requests naphthalene concentrations be confirmed by test method TO-17 for at least three (3) of the soil vapor samples.
- 5. Contingency Sampling** – ACDEH is in general concurrence with the installation of soil vapor pins should elevated groundwater conditions prevent collection of soil vapor samples. ACDEH requests submittal of a revised work plan depicting the proposed locations of the soil vapor pins if the pins are to be installed.
- 6. Data Review** – Following collection of the soil vapor data, ACDEH requests submittal of the laboratory analysis report to ACDEH, Attention: Keith Nowell, as an electronic mail attachment and to the SWRCBs GeoTracker website by the date specified below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH FTP site (Attention: Keith Nowell), and to the SWRCBs GeoTracker website, in accordance with the following specified file naming convention and schedule:

- **August 17, 2017 – Electronic Submittal of Information-** List of documents submitted to GeoTracker (provided to ACDEH, Attention Keith Nowell, via electronic mail)
- **September 18, 2017 – Electronic Submittal of Information-** Soil Vapor Laboratory Analysis Report

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.

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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.

Sincerely,

Keith Nowell PG, CHG
Hazardous Materials Specialist

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

cc: Kayleigh Lim, Environmental Program Specialist, Oakland Public Works, 250 Frank Ogawa Plaza, Suite 5301, Oakland CA 94612 (*Sent via electronic mail to: klim@oaklandnet.com*)

Andrew Romolo, Terraphase Engineering Inc., 1404 Franklin Street, Suite 600, Oakland, California 94612 (*Sent via electronic mail to: andrew.romolo@terrphase.com*)

Anna Behrens, Terraphase Engineering Inc., 1404 Franklin Street, Suite 600, Oakland, California 94612 (*Sent via electronic mail to: anna.behrens@terrphase.com*)

Diane Heinze, Port of Oakland, 530 Water Street, Oakland, CA 94604-2064 (*Sent via electronic mail to: dheinze@portoakland.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 / 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.