

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

COLLEEN CHAWLA, Agency Director



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

June 12, 2018

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:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case files including the document entitled *Work Plan for Groundwater Monitoring Well Installation* (Work Plan), dated April 30, 2018 and prepared by Terraphase Engineering Inc. (Terraphase) for the subject case.

As presented in the Work Plan, Terraphase proposes to advance six soil bores for the installation of two sets of clustered, interval-specific groundwater monitoring wells to aid in the vertical delineation of petroleum hydrocarbon contamination. Well placement is based on the results of the recent membrane interface probe (MIP) investigation. It is anticipated that two wells will be advanced to 10 feet below the existing ground surface (bgs), two bores will be advanced to 20 feet bgs, and two bores advanced to 35 feet bgs. Each of the wells will be constructed with five feet of well screen.

Water samples collected from each of the wells will be analyzed for total petroleum hydrocarbons (TPH) as gasoline (TPHg), TPH as diesel (TPHd), TPH as motor oil (TPHmo), TPH as kerosene (TPHk), benzene, toluene, ethylbenzene, and xylenes (collectively BTEX), methyl tertiary butyl ether (MTBE), and naphthalene. Extractible range TPH (TEPH) analysis will be performed both with and without silica gel cleanup (SGC).

In conjunction with the well installation, a groundwater monitoring event will be conducted for the existing well network. TEPH without SGC will be performed on select groundwater samples (RW wells -B1, -B4, -C6, -D6, and MW wells -5 and -12).

Based on the review of the case file, ACDEH is in general agreement with the proposed scope of work. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below. Note the report submittal will be presented in the next scheduled meeting set for September, 2018. Please provide 72-hour advance written notification to this office (electronic mail preferred to: keith.nowell@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- 1. Soil Sampling:** ACDEH notes that soil samples are not planned to be recovered from the soil bores. We request a soil sample be collected within the 0- to 5-foot interval and from within the interval of each of the proposed well screens for each of the two well clusters.
- 2. Analysis Scope:** Please analyzed the soil samples requested above for TPHg, TPHd, TPHmo, TPHk, BTEX, MTBE, and naphthalene. TEPH analysis maybe performed without SGC.
- 3. Reporting:** ACDEH requests the soil bore logs include the soil screening PID readings with the report requested below.

Findings of the groundwater investigation and monitoring event will discussed at out upcoming September, 2018 meeting.

TECHNICAL REPORT REQUEST

Please upload technical reports to the State Water Resources Control Board (SWRCB) GeoTracker website, in accordance with the following specified file naming convention and schedule:

- **September 7, 2018 – Well Installation and Groundwater Monitoring Report** (Report to be named RO0000449_SWI_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.

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

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@terraphase.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

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

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 the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

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 and include the professional registration stamp, signature, and statement of professional certification. 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

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.