

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
REBECCA GEBHART, Acting Director



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

May 5, 2016

Mr. Phillip Jaber
George H. Jaber Trust
2801 Encinal Avenue
Alameda, CA 94501-4726

Subject: Request for Work Plan for Confirmation Sampling; Fuel Leak Case No. RO00000373 Olympic Station (Global ID T0600102256), 1436 Grant Avenue, San Lorenzo, CA 94580

Dear Mr. Jaber:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *Remediation Status Report and Results of Fourth Quarter 2015 Groundwater Monitoring and Sampling Event*, dated February 10, 2016, the *Additional Site Assessment and Expanded Water Well Survey Report*, dated, March 7, 2016, and the *First Quarter 2016 Groundwater Monitoring and Sampling Event Results Report*, dated April 26, 2016. The reports were prepared and submitted on your behalf by Stratus Environmental, Inc. (Stratus). Thank you for submitting the reports.

The referenced investigation report and water well survey documented the installation of offsite downgradient groundwater monitoring wells MW-7A and MW-8A, and offsite vapor wells VP-6 and VP-7. Substantial decreases in soil vapor were documented in several previously sampled vapor wells located onsite, while others could not be resampled due to the presence of water in the vapor well. Recently installed offsite vapor wells VP-6 and VP-7 documented relatively low vapor concentrations that appear to meet Scenario 3 of the Vapor Intrusion Media Specific Criteria at the offsite location. However, at the site because the system was recently shut down, soil vapor equilibrium may not have been reestablished. At present ACDEHs review indicates that the presence of Total Petroleum Hydrocarbons as gasoline or diesel (TPH) over 100 milligrams per kilogram (mg/kg) in the 0 to 5 foot depth interval, sporadic very low oxygen concentrations in soil vapor (below 4 percent), and naphthalene detections above the acceptable commercial vapor concentration for naphthalene at commercial sites, the site does not yet appear to meet the State Water Board's Low Threat Closure Policy (LTCP) in soil vapor for sites without a bioattenuation zone.

A door to door well survey was conducted within 500 feet downgradient or cross gradient of the site and three unknown water supply wells, that are reported to be used to irrigate the properties only, were located. The closest well is approximately 210 feet to the north, directly across Grant Avenue from the site, while a second is approximately 720 downgradient from a release location, and less than approximately 550 feet from the approximate downgradient edge of the groundwater plume.

The *First Quarter 2016 Groundwater Monitoring and Sampling Event Results Report* documented the first groundwater monitoring event (January 11, 2016) after the Dual Phased Extraction (DPE) system was turned off on December 29, 2015.

Based on ACDEH staff review of the case and files, we request that you address the following technical comments and send us the reports described below.

TECHNICAL COMMENTS

- 1. Quarterly System Rebound Groundwater Monitoring** – ACDEH requests continuation of the quarterly groundwater monitoring of all site groundwater monitoring wells in order to reasonably quickly assess post-shutdown groundwater concentration trends.
- 2. Residential Water Supply Wells** – As noted above, three privately owned water supply wells were located during the recent door-to-door water well survey. Rather than the installation of one or more sentinel wells which would potentially require long term monitoring, it appears appropriate to request

the sampling of the wells in an effort to directly determine the potential for exposure to contaminants derived from the subject site.

- 3. Work Plan Request** – In general recently collected data from the site has documented substantially improved subsurface contaminant concentrations, but is currently producing inconsistent data for evaluating the site itself under the LTCP. Consequently, concurrent with groundwater rebound monitoring, it appears appropriate to collect soil confirmation samples at locations documented to once have had elevated volatile contaminant concentrations; for example near EX3, BH-B, WO-1, and potentially other locations. It also appears appropriate to request seasonal soil vapor sampling during the rebound monitoring period in order to incorporate all vapor wells, vapor seasonality fluctuations, and potentially rebounding vapor concentrations. Finally, ACDEH did not locate poly-aromatic hydrocarbon (PAH) data associated with the former waste oil UST consistent with the LTCP testing requirements. Unless, data is located, it appears appropriate to collect naphthalene and PAH data at the site as well as at the location of the former waste oil UST.

Please utilize existing protocols to the extent practicable in an effort to simplify the preparation and review of the work plan.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below, according to the following schedule:

- **July 8, 2016** – Second Quarter 2016 Groundwater Monitoring Report; File to be named RO373_QMR_R_YYYY-mm-dd
- **July 22, 2016** – Work Plan
File to be named: RO373_WP_R_YYYY-mm-dd
- **60 Days After Work Plan Approval** – Site Investigation Report
File to be named: RO373_SWI_R_YYYY-mm-dd
- **September 30, 2016** – Third Quarter 2016 Groundwater Monitoring Report; File to be named RO373_QMR_R_YYYY-mm-dd
- **January 13, 2017** – Fourth Quarter 2016 Groundwater Monitoring Report; File to be named RO373_QMR_R_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.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

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

Mr. Phillip Jaber
RO0000373
May 5, 2016, Page 3

cc: Scott Bittinger, Stratus Environmental, Inc, 3330 Cameron Park Drive, Suite 550, Cameron Park, CA 95682 (sent via electronic mail to: sbittinger@stratusinc.net)

Gowri Kowtha, Stratus Environmental, Inc, 3330 Cameron Park Drive, Suite 550, Cameron Park, CA 95682 (sent via electronic mail to: gkowtha@stratusinc.net)

Dilan Roe, ACDEH, (sent via electronic mail to dilan.roe@acgov.org)

Mark Detterman, ACDEH, (sent via electronic mail to mark.detterman@acgov.org)

Electronic File, GeoTracker

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.