

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
FAX (510) 337-9335

July 18, 2017

Grimit Family Trust
Attn.: Peggy Garcia, Trustee
14618 Dublin Avenue
Gardena, CA 90549
(Sent via electronic mail to peggy.h.garcia@sbcglobal.net)
(Sent via electronic mail to angelcpt@gmail.com)

Subject: Request for a Work Plan Addendum; Fuel Leak Case No. RO0000413 and GeoTracker Global ID T0600100667, Grimit Auto Repair & Service, 1970 Seminary Avenue, Oakland, CA 94619

Dear Ms. Garcia and Ms. LaMarca:

Thank you for the recent submittal of the documents entitled *Groundwater Monitoring and Sampling Report* (GWM) dated May 4, 2017, and *Updated Water Well Survey and Work Plan for Additional Site Assessment* (Work Plan), dated June 13, 2017. Both documents were prepared by Stratus Environmental, Inc. (Stratus) for the subject case. Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the aforementioned documents. The Work Plan was prepared at the request of ACDEH in our letter dated May 17, 2017.

In our letter of May 17, 2017, ACDEH requested

- A. An update of a 1994 well search to include the Alameda County Public Works Agency (ACPWA) and Department of Water Resources (DWR) databases;
- B. Perform an on-site soil vapor assessment;
- C. Sample perimeter monitoring well MW-3;
- D. Collection of a soil vapor sample from the vicinity of MW-8;
- E. Collection of soil samples and a grab-groundwater sample from a boring advanced in the vicinity of MW-8.

Stratus has addressed Item A above with the inclusion of the findings of a well survey in the Work Plan. The well survey reviewed the ACPWA and DWR databases. The well search, performed at our request to identify potential receptors to contaminated groundwater from release(s) at the subject site, identified one beneficial use well, an irrigation well, located within the 2,000-foot search radius.

To address Item B and Item C, Stratus proposes to conduct an on-site soil vapor assessment using existing soil vapor wells and attempt to gain access to monitoring well MW-3 for collection of a water sample.

In response to Item 4 and Item 5, Stratus noted that though a small walkway is present to the west-southwest of MW-8, limited access and the presence of underground utilities may restrict subsurface work in this area. Stratus also indicated off-site access to the adjacent property at 5909 Harmon Road has not been obtained.

ACDEH requests preparation of a work plan addendum to address the following technical comments.

TECHNICAL COMMENTS

- 1. Well Search** – Thank you for summarizing the results of the well search in the Work Plan. ACDEH requests inclusion of the well search data in the work plan addendum requested below. As indicated above, one beneficial use well, an irrigation well, was located within the search radius. The well is situated on a property approximately 600 feet northeast of the subject site. In the work plan addendum requested below, please propose to contact the property owner, confirm the presence and status of the well. Include a proposal to sample the well at no cost to the property owner, and inform the property owner a copy of the analytical results will be provided to them.
- 2. On-site Soil Vapor Assessment** – ACDEH is in general concurrence with the sampling of the existing on-site soil vapor wells. However, data for review should reflect existing soil-vapor conditions. Therefore, ACDEH requests that the proposed dual phase extraction (DPE) event not be performed. Additionally, ACDEH requests at least two of the soil vapor samples collected from the 5-foot wells confirm naphthalene concentrations by test method TO-17.

In our May 17, 2017 letter, ACDEH requested the work be performed in accordance with July 2015 *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. The Work Plan does not state the work will be performed in accordance with the Advisory. ACDEH requests the inclusion of the Stratus standard operating procedures (SOPs) for soil gas collection in the work plan addendum requested below.

- 3. Well Sampling** – ACDEH is in general concurrence with the sampling of groundwater monitoring well MW-3. Please outline the analysis scope in the work plan addendum requested below. Additionally, please provide ACDEH with the tenant contact information should the tenant not cooperate with your access to the well.
- 4. MW-8 Soil Vapor Assessment** – In our May 17, 2017 letter, ACDEH requested collection of a soil vapor sample from the vicinity of MW-8. Though we referred to it as an off-site soil vapor assessment, this should not be construed that the sample collection be performed off-site, only that soil vapor sample(s) be collected along the property line adjacent to 5909 Harmon Avenue and 5906 Holway Street. If the presence of utilities are a concern, ACDEH suggests a utility survey be performed prior to selecting soil vapor probe locations. Please present the proposed probe locations and alternate locations on a figure in the work plan addendum requested below. If a utility survey is performed, please include the utility location diagram as a figure in the work plan addendum requested below.

Concurrent with preparation of the work plan addendum, ACDEH will request access to the adjoining properties for temporary soil vapor sampling points and will keep you informed of the status of the request.

- 5. MW-8 Soil and Groundwater Assessment** – ACDEH also requested a soil boring be advanced in the vicinity of MW-8 for the purpose of recovery of soil and grab-groundwater samples for laboratory analysis. At a minimum, please propose to collect soil samples from within the 0- to 5-foot and 5- to 10-foot intervals in accordance with the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) Media Specific Criteria for Direct Contact and Outdoor Air Exposure. Analysis scope for the samples should include the analyses presented in the SWRCBs Leaking Underground Fuel Tank (LUFT) Guidance Manual (September 2012). Please present the proposed soil bore location and alternate locations on a figure in the work plan addendum requested below. Include a discussion of the scope of analysis and SOPs for recovery of soil and GGW samples.

6. Groundwater Monitoring Reports – ACDEH requests future groundwater monitoring reports include a depth-to-water (DTW) column in the Table 2, *Groundwater Analytical Summary for Petroleum Hydrocarbons*, for more efficient evaluation of concentration and DTW data. We also request the screened interval for each well be provided in Table 2, perhaps below the ‘deep’ and ‘shallow’ designations. Groundwater flow calculations have not been performed for the site since 2013. ACDEH requests a resumption of the calculations, using screened alike wells, e.g. grouping wells MWs -3, 6, & 9 and MWs -4, 5 & 7. Based on the reported groundwater flow directions, ACDEH will make a determination of continuing groundwater flow calculations for future monitoring events. Additionally, ACDEH recommends the discontinuance of the analysis for total oil and grease (TOG).

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 11, 2017 – Groundwater Monitoring and Sampling Report, Second Quarter 2017** (file name: RO0000413_GWM_R_YYYY-MM-DD)
- **September 1, 2017 – Work Plan Addendum for Soil, Groundwater, and Soil Vapor Investigation** (file name: RO0000413_WP_ADEND_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.

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

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.