



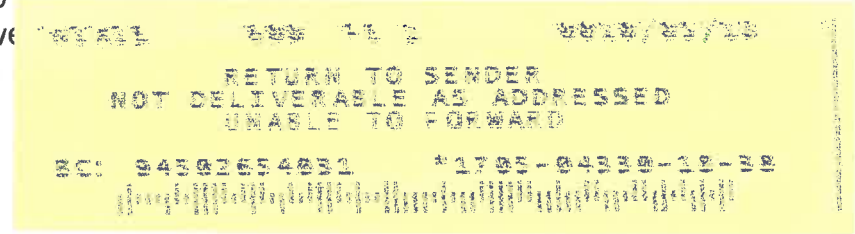
ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 LOCAL OVERSIGHT PROGRAM (LOP)
 For Hazardous Materials Releases
 1131 Harbor Bay Parkway
 Alameda, CA 94502-6577

OAKLAND
 CA 945
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Mr. Dan Tisoncik
 United Airlines
 1200 E Algonquin Rd.
 Elk Grove

RD414



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September 17, 2018

Khamly Chuop
Port of Oakland
530 Water Street
Oakland, CA 94604-2064
(Sent via electronic mail to
kchuop@portoakland.com)

Mr. Dan Tisoncik
United Airlines
1200 E. Algonquin Rd.
Elk Grove Township, IL 60007

Subject: Site Cleanup Program (SCP) case file # RO0000414 and Geotracker Global ID T0600101423, MOIA, United Airlines MF35/36, 1100 Airport Drive, Oakland CA 94621

Dear Ms. Chuop and Mr. Tisoncik:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file including the recently submitted documents entitled *OMC Wells* and *Figure 1*, provided as attachments to an electronic mail correspondence (CORRES) dated August 1, 2018, in conjunction with the document entitled *Work Plan for Groundwater Sampling and Well Abandonment* (Work Plan), dated January 26, 2016 and prepared by Baseline Environmental Consulting (Baseline).

The CORRES documents the location, construction details and condition of the wells comprising the groundwater monitoring well network for the Oakland Maintenance Center (OMC), the subject Site.

In the Work Plan, Baseline proposes to abandon 27 of the network wells prior to the demolition of the Site building, designated as Building M110. Three wells in the network, identified as ERM-MW-9, ERM-MW-10 and ERM-MW-15, will be retained and sampled. As the wells have not been sampled since 2006, Baseline will have the wells redeveloped prior to the proposed one-time sampling event. The recovered water samples will be analyzed for dissolved Title 22 metals.

ACDEH generally concurs with the proposed scope of work, provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. We request that you address the following technical comments, and submit the technical reports requested below. 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. **Electronic Submittal of Information (ESI)** – Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the State Water Resource Control Board's (SWRCB) GeoTracker system via the internet. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs, including site cleanup (SCP) cases. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites was required in GeoTracker.

A review of the GeoTracker case file reveals the Site is not in compliance with ESI Regulations. Though several reports have been submitted to GeoTracker, it is not clear if all required reports have been submitted. Additionally, GeoTracker does not contain any of the supporting data submittals, including but not limited to:

- **Lab Data:** Analytical data (including geochemical data) for all soil, vapor and water samples that are collected for the purpose of subsurface investigation or remediation are required to be submitted in specified EDF format to a regulatory agency.