



June 12, 2018

East Bay Municipal Utility District  
c/o Environmental Compliance Section  
375 Eleventh Street MS #704  
Oakland, CA 94607-4240  
Attn.: Mr. John Walter  
(Sent via electronic mail to: [jwalter@ebmud.com](mailto:jwalter@ebmud.com))

Subject: Fuel Leak Case No. RO0000449 and Geotracker Global ID T0600100495, EBMUD, 1075 W Grand Ave, (the Anderson Building - formerly 2130 Adeline Street), Oakland, CA 94607

Dear Mr. Walter:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the document entitled *Site Investigation Work Plan* (Work Plan) prepared by Engineering/Remediation Resources Group, Inc. (ERRG) and dated September 14, 2017. The Work Plan was prepared at the request of ACDEH in our letter of June 6, 2017 for the East Bay Municipal Utility District (EBMUD) facility located at 1075 West Grand Avenue (the Anderson building- formerly 2130 Adeline Street), Oakland.

As presented in the Work Plan, ERRG proposes to conduct a geophysical survey to locate and determine the depths of any subsurface utilities at the site to evaluate whether utility corridors are potential preferential pathways for lateral migration of contaminants in the subsurface, and to collect soil and grab-groundwater (GGW) samples from two soil borings on the northern and southern side of the former underground storage tank (UST) location on Linden Street. Laboratory analysis of the samples will be performed to evaluate for the presence of total petroleum hydrocarbons (TPH) has gasoline (TPHg), benzene, toluene, ethylbenzene, xylene (BTEX), and methyl tertiary butyl ether (MTBE).

ERRG proposes to collect one soil sample from each boring at 6 inches above the depth where groundwater is first encountered. Two additional soil samples may be collected from the vadose zone in each boring if photoionization detector (PID) field screening results indicates the presence of volatile organic compounds. If no volatile organic compounds are detected by the PID, then no additional soil samples will be collected.

Based on ACDEH staff review of the referenced document and of the case file, we generally concur 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, perform the proposed work, and send us the technical reports requested below. Please provide 72-hour advance written notification to this office (electronic mail preferred to: [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org)) prior to the start of field activities.

## **TECHNICAL COMMENTS**

- 1. Soil Sampling:** ACDEH requests soil samples be collected within the 0- to 5-foot and 5- to 10-foot intervals for evaluation 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. Additionally, ACDEH recommends that soil samples be collected and analyzed at intervals of no more than five feet, areas of obvious contamination, the soil/groundwater interface, and at significant changes in lithology. If staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number of soil samples from this interval should be submitted for laboratory analyses to

characterize the fuel hydrocarbon concentrations within this interval. Please ensure that the analytical results define the vertical extent of total petroleum hydrocarbon (TPH) impacts at the site.

2. **Analysis Scope:** ACDEH notes the contents of the Linden Street UST is referenced as 'fuel' and as 'gasoline'. No documentation was located in the case files confirming the contents of the former tank. Additionally, laboratory analyses has been limited to volatile-range petroleum hydrocarbons and its constituents. Therefore, ACDEH requests the scope of analysis presented by ERRG be expanded to include TPH as diesel (TPHd) and naphthalene. Please perform the TPHd analysis without silica gel cleanup (SGC).
3. **Reporting:** ACDEH requests the soil bore logs include the soil screening PID readings with the report requested below.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the SWRCB GeoTracker website, in accordance with the following specified file naming convention and schedule:

- **October 11, 2018** – Soil and Groundwater Investigation 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](mailto:keith.nowell@acgov.org).

Sincerely,

Keith Nowell PG, CHG  
Hazardous Materials Specialist

Enclosure: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations

Dan Lohr, Engineering/Remediation Resources Group, Inc., 4585 Pacheco Blvd., Suite 200, Martinez, CA 94553;  
(Sent via electronic mail to: [dan.lohr@errg.com](mailto:dan.lohr@errg.com))

Dilan Roe, ACDEH, (Sent via electronic mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))  
Paresh Khatri, ACDEH; (Sent via electronic mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org))  
Keith Nowell, ACDEH, (Sent via electronic mail to: [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org))  
GeoTracker

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> December 14, 2017
	<b>ISSUE DATE:</b> July 25, 2012
	<b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016
<b>SECTION:</b> ACDEH Procedures	<b>SUBJECT:</b> 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/](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 values<sup>1</sup> 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
<b>2016 Subsurface Investigation Report</b>	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
<b>2012 Site Assessment Work Plan</b>	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>2010 GW Investigation Report</b>	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	✓	✓	✓	✓	✓

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

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> NA
	<b>ISSUE DATE:</b> December 14, 2017
	<b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016
<b>SECTION:</b> ACDEH Procedures	<b>SUBJECT:</b> 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/](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.