



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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November 6, 2014

Mr. Kevin Singh
Bay Area Concrete Recycling
24701 Clawiter Road
Hayward, CA 94545
(Sent by electronic mail to kevin@economytrucking.net)

Subject: Modified Work Plan Approval; Site Cleanup Program (SCP) Case RO0002499 and Geotracker Global ID T06019790228 AAA Truck Parts Company, 3884 Depot Road, Hayward, CA 94545

Dear Mr. Singh:

At your request Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site, including the correspondence entitled *Work Plan*, dated August 22, 2014. The report was prepared and submitted on your behalf by Chemical Data Management Systems (CDMS) as the work plan addendum requested in the May 23, 2014 directive letter from ACEH. Thank you for submitting the work plan addendum.

Based on ACEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Work Plan Clarifications** – The referenced work plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests several modifications to the approach. Please submit a report by the date specified below.
 - a. **Redevelopment of Groundwater Monitoring Wells** – The referenced work plan proposes to collect groundwater samples at remaining groundwater monitoring wells MW-1 and MW-2. This is appropriate; however, since the last time the wells were sampled appears to have been in January 2003, it is also appropriate to redevelop the wells prior to sampling. This is expected to reduce the potential for contaminant concentrations absorbed to sediment that has since entered the well casing to artificially raise the contaminant concentrations reported for groundwater. Please allow 72-hours before sampling to allow remaining sediment to settle. Please also provide a copy of the field record of the well redevelopment field notes.
 - b. **Groundwater Analysis** – The referenced work plan proposes to sample groundwater for Total Petroleum Hydrocarbons (TPH) as gasoline, TPH as diesel, and TPH as motor oil. However, because grab groundwater sample GW-3, collected from soil bore P-3, contained elevated TPH as gasoline, TPH as diesel, TPH as motor oil, and contained up to 110 micrograms per liter (µg/l) benzene, and 120 µg/l ethylbenzene, ACEH additionally requires the collection of volatile petroleum hydrocarbon compounds from each well, including benzene, toluene, ethylbenzene, total xylenes (BTEX), methyl-tert-butyl ether (MTBE), and naphthalene by appropriate EPA

methods. This is anticipated to help define the lateral or downgradient extent of contamination at the GW-3 location.

Additionally, due to previous elevated detection limits for nickel in groundwater in both wells, ACEH requires analysis for nickel in groundwater in both wells. Please ensure that the metals analysis sample collection container is not acidified, or is field filtered prior to acidification, to ensure the analysis is representative of groundwater rather than of suspended sediment.

- c. **Soil Collection Depths** – The referenced work plan proposes to collect soil samples at a depth of 6 inches and 12 inches, to analyze the shallower samples, and to hold the deeper sample interval until the results of the shallow soil samples are available. This appears to be reasonable, and ACEH requires that this protocol apply to each soil sampling location.
- d. **Hazardous Waste Storage Concrete Slab Sampling** – The referenced work plan proposes to collect soil samples 10 feet from the four sides of the concrete slab and analyze the soil for TPH as gasoline, TPH as diesel, and TPH as motor oil, but did not explicitly identify the number of soil samples to be collected. ACEH assumes that the inference to four sides implies that four samples will be collected at this distance from the slab. If this is incorrect, please ensure that four samples are collected at this distance on the four sides of the slab.

Additionally, because the highest likely location for residual contamination is at the edge of the concrete slab, ACEH additionally requires that the collection of soil within approximately 1 foot of the edge of the four sides of the concrete slab. Similar to the proposal, samples collected at 6 inches in depth should be run and soil samples collected at 1 foot can be held pending the results of the shallower samples.

Additionally, because zinc was elevated at soil sample P-3, ACEH requires analysis of all soil samples at this location for zinc (please also see next Technical Comment). Should deep soil samples require analysis, these are also to be analyzed for these TPH ranges, and zinc.

five Leaking Underground Fuel Tank (LUFT) metals

- e. **Soil and Grab Groundwater in GW-3 Sample Area** – As noted above, grab groundwater sample GW-3 collected from soil bore P-3 contained elevated TPH as gasoline, TPH as diesel, TPH as motor oil, and contained up to 110 micrograms per liter ($\mu\text{g/l}$) benzene, and 120 $\mu\text{g/l}$ ethylbenzene. Consequently ACEH requires the collection of a grab groundwater sample at the former location of P-3 in order to help assess the extent of degradation that may have occurred in the intervening period of time. As discussed above, the collection of a groundwater sample from well MW-1 may additionally help determine the downgradient extent of the groundwater contamination.

Additionally, due to zinc concentrations over the San Francisco Bay Regional Water Quality Control Board's (RWQCBs) Environmental Screening Levels (ESLs) of 600 milligrams per kilogram (mg/kg) at soil sample location P-3 (sample P3-1; 1,100 mg/kg), ACEH requires the analysis of zinc at the four soil sample locations 10 feet in each compass direction from the location of P-3.

- f. **Southern Parts Storage Area** – The referenced work plan proposes to collect an unspecified number of soil samples in the vicinity of soil bore P-7 and the southern parts storage area to evaluate the lateral extent of soil contamination encountered at bore P-7. Analysis was proposed for TPH as gasoline, TPH as diesel, and TPH as motor oil. Because the work plan did not specify the number of soil samples, ACEH requires the collection of four soil samples approximately 10 feet in each compass direction from the location of P-7, in addition to the proposed recollection of soil samples at P-7.
- g. **Central Outdoor Storage Area** – The referenced work plan proposes to collect four samples west of sample location P-2 for an unspecified reason. Because soil sample P-2 contained elevated TPH as diesel and TPH as motor oil concentrations, ACEH requires that four samples be collected at locations 10 feet in each compass direction from the location of P-2 and be analyzed for TPH as diesel and TPH as motor oil.

Additionally, due to zinc concentrations over the RWQCBs ESL of 600 mg/kg at sample location P-2 and P-6 (samples P2-2; 770 mg/kg and P6-1; 1,800 mg/kg, respectively), ACEH requires the analysis of zinc at the four sample locations 10 feet in each compass direction from the locations of P-2 and P-6, in addition to the recollection of samples at P-2 and P-6 to evaluate current concentrations at these locations.

- h. Former Brake Manifold Storage Racks** – The referenced work plan proposes to collect an unspecified number of soil samples from this former use area and analyze them for unspecified metals. In an effort to eliminate this area as an area of concern, ACEH requires the collection of four soil samples within this former use area, with analysis for the five LUFT metals.
- 2. Request for Comprehensive Tabulation of Soil and Groundwater Analytical Data** – The subject work plan provided multiple tables for soil, multiple tables for grab groundwater, and multiple tables groundwater analytical data in a non-comprehensive way. The tables did not list important analytical results for seven different sampling locations, and did not provide the detection limit for each non-detectable analyte. A significant and extensive amount of time was required to understand the data being summarized. As a consequence, ACEH requests the generation of a single table on a single page for each of the three environmental media (soil, grab groundwater, and groundwater) using the detection limit for non-detectable concentrations (<0.005, etc.) in order to facilitate quick communication of the data collected in the past and future.

This request is in addition to a request for the submittal of other items that are standard in a report, including an overview of the site and former site features, and a sufficient number of figures to understand past and future sample locations within the site.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH 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:

- **January 16, 2015** – Soil and Groundwater Investigation
(File to be named: RO2499_SWI_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

cc: James Carro, Chemical Data Management Systems, 6515 Trinity Ct., Suite 201, Dublin, CA 94568, (sent via electronic mail to jim@cdms.com)
Fredric Hoffman, Chemical Data Management Systems, 6515 Trinity Ct., Suite 201, Dublin, CA 94568, (sent via electronic mail to fredric.hoffman@gmail.com)
Dilan Roe, ACEH (sent via electronic mail to dilan.roe@acgov.org)
Mark Detterman, ACEH (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.