



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

July 9, 2015

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

Subject: Request for Work Plan; 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 *Economy Trucking Report May 2015*, dated May 3, 2015. The report was prepared and submitted on your behalf by Chemical Data Management Systems (CDMS). Thank you for submitting the report.

The report documented the collection of shallow soil samples (6 and 12 inches) from nine soil bores, and the collection of two rounds of groundwater sampling from well MW-1 and MW-2.

The soil samples documented Total Petroleum Hydrocarbons as diesel (TPHd) and TPH as motor oil (TPHmo) up to 4,400 milligrams per kilogram (mg/kg) in soil beneath the site, but did not define the lateral or vertical extent of the contamination from these locations (the generic Environmental Screening Level [ESL] promulgated by the San Francisco Regional Water Quality Control Board [RWQCB] is 500 mg/kg). The soil bores also detected up to 910 mg/kg total chromium, 350 mg/kg lead, and 1,900 mg/kg zinc (the RWQCB ESLs are 2,500 mg/kg, 320 mg/kg, and 600 mg/kg, respectively; however, the California Soluble Threshold Limit Concentration [STLC] may be applicable for the total chromium concentration). Please be aware that ESLs are not necessarily the cleanup goal, but are often used as such in lieu of generating site specific goals. Provided site specific data, ESLs are but a starting point for site specific considerations.

The report documented up to 3,500 micrograms per liter ($\mu\text{g/l}$) TPHd, and 4,300 $\mu\text{g/l}$ TPHmo in groundwater collected from wells MW-1 and MW-2, but did not define the extent of the groundwater plumes from these well locations. The report speculated that surface derived contaminants had entered the wells and contaminated the groundwater, but did not provide corroborating data, such as a limited extent in soil or groundwater. As such the Site Conceptual Model (SCM) that has been advanced for the site was not tested. Conversely, for heavier hydrocarbons in the extractable range, this problem may partly be addressed by the use of Silica Gel Cleanup (SGC) on extractable TPH contamination; however, please be aware that the RWQCB currently recommends duplicate samples with and without SGC to allow an assessment of TPH degradation products.

The report compared all contaminants to the January 1996 RWQCB *Interim Guidance on Required Cleanup at Low-Risk Fuel Sites*; however, this is an inappropriate document to attempt to close a site for several reasons. For petroleum hydrocarbons, the correct document to utilize is the August 2012 State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Unlike the 1996 document, the LTCP allows non-UST petroleum sites to use the policy; provided the site meets each of the General and Media-Specific Criteria. However, the LTCP also does not consider TPH risk to ecologic receptors, such as may be present downgradient of the site due to the undefined extent of hydrocarbon contamination in groundwater at each well and the proximity of the Bay (TPH degradation products may be more of a concern with ecologic receptors). Please be aware that this

policy applies only to petroleum hydrocarbon derived contamination, but does not apply to non-petroleum derived contaminants such as metals, acids, or paint.

The report also documented the likely presence of red paint in well MW-2 and the pumping of 300 gallons of groundwater from wells MW-1 and MW-2 to clear the wells of the affects of any residual paint, but did not document the appropriate disposal of the groundwater at a facility qualified to accept contaminated groundwater. This is a standard investigation requirement and needs to be documented.

Finally, the lack of discussion about, or inclusion of data in tables, for volatile organic compounds (VOCs), is unusual. One of the critical items requested in our November 2014 letter was the sampling of groundwater for these contaminants, yet the only documentation that the analytes were tested for were in the laboratory report included at the end of the report.

At this juncture ACEH requests that you prepare a Work Plan to address each of these data gaps that is supported by a focused Site Conceptual Model (SCM) to address the Technical Comments provided below.

TECHNICAL COMMENTS

- 1. Request for Data Gap Work Plan** – Please submit a data gap work plan to address the comments above, by the date identified below.

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:

- **September 11, 2015** – Work Plan
(File to be named: RO2499_WP_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)
Kimberly Douglas, Bay Area Concrete Recycling, 24701 Clawiter Road, Hayward, CA 94545, (sent via electronic mail to kimberly@baconcrete.net)
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.