

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM FOR
HAZARDOUS MATERIALS RELEASES
1131 HARBOR BAY PARKWAY, SUITE 250
ALAMEDA, CA 94502
(510) 567-6700
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December 30, 2016

2200 Wood Street LLC
2200 Wood Street
Oakland, CA 94607
Attn.: Alan Lucchesi
(Sent via electronic mail to: alanlucchesi@gmail.com)

Subject: Review of Work Plan Addendum; Site Cleanup Program (SCP) Case No. RO0002934 and GeoTracker Global ID SLT19795063, Lucchesi Property, 2200-2222 Wood Street, Oakland, CA 94607

Dear Mr. Lucchesi:

Thank you for the recent file submittals to the State Water Resources Control Board's (SWRCBs) GeoTracker website and the preparation and submittal of the document entitled *Work Plan for Limited Phase II Subsurface Investigation (WPA)* dated November 30, 2016 and prepared by ERAS Environmental, Inc. (ERAS) for the subject site. The WPA was prepared at the request of Alameda County Department of Environmental Health (ACDEH) in its letter dated October 10, 2016. The WPA is an addendum to an August 30, 2016 work plan prepared by ERAS and addresses comments made by ACDEH in our October 10, 2016 letter.

ACDEH has reviewed the case file in conjunction the SWRCBs Low Threat Underground Storage Tank Case Closure Policy (LTCP). As noted in a prior correspondence, ACDEH uses the LTCP as guidance for closure criteria for cases consisting of release(s) which include petroleum hydrocarbons. Based on our review, ACDEH determined that the site fails to meet the LTCP General Criteria e (Site Conceptual Model), and the Media-Specific Criteria for Groundwater, and the Media-Specific Criteria for Direct Contact and Outdoor Air. As a result of this determination, ACDEH requested preparation of a Data Gap Investigation Work Plan supported by a focused Site Conceptual Model (SCM) that addresses the General and Media Specific criteria of the LTCP.

In our October 10, 2016 letter, ACDEH requested further clarification pertaining to hazardous materials storage locations and hydrogeologic setting and scope of sample analysis.

As presented in the WPA, ERAS proposes to advance six (6) soil bores for the recovery of soil and grab-groundwater (GGW) samples. Locations of the proposed bores are depicted on Figure 2 of the WPA and are based on previous site studies, including a *Phase I Environmental Site Assessment (ESA)* dated May 25, 2006 and a soil and groundwater investigation report entitled *Phase II Subsurface Investigation (SWI)* and dated June 30, 2006. Both studies were conducted by AEI Consultants (AEI). Additionally, the WPA presents an SCM that incorporates information presented in the previous investigations conducted in 2006 by AEI. As part of its SCM presentation, ERAS stated the extent of contamination has not been determined.

Though the WPA states soil and groundwater samples will be collected from each boring for laboratory analysis, it only specifies analyses for soil samples recovered from the borehole near a storm drain. ERAS proposes analysis of soil (and groundwater) samples from this boring for petroleum hydrocarbons and ethylene glycol, and that groundwater samples will also be collected from the other five (5) borings which are situated along the margins of the site. The GGW samples collected from the perimeter soil bores will be analyzed for the presence of total petroleum hydrocarbons (TPH) as diesel (TPHd) and as oil (TPHo),

volatile organic compounds (VOCs), and semi-volatile organic compounds (SVOCs). A sensitive receptor survey is also proposed to determine the locations of nearby wells within a 0.5-mile radius and other potential sensitive receptors.

Based on ACDEH staff review of the referenced documents and of the case file we generally concur with the recently proposed scope of work, provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. While the comments below request an additional soil bore, submittal of a revised Work Plan is limited to a revised Figure 2. Unless an alternate scope of work outside that described in the WPA and technical comments below is proposed. We request that you address the following technical comments, submit the requested document, and upon ACDEH approval, 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) prior to the start of field activities.

Additional data may be available that ACDEH is not aware of, or may not have been submitted, and therefore has not been incorporated in to ACDEH's review. If additional data is made available, the data can be incorporated in future case reviews.

TECHNICAL COMMENTS

1. Additional Soil Bore – The SCM included within the WPA states that, “based on the location of the onsite storm drain and known contaminates of concern, the storm drain could be a migration pathway”. In order to evaluate this potential pathway, ACDEH requests an additional soil bore be advanced in the vicinity of where the storm drain pipeline exits the property. Please submit a revised Figure 2 depicting the location of the soil bores for ACDEH review and approval. Please send the revised figure as an electronic mail attachment to keith.nowell@acgov.org by the date specified below.

2. Soil Bore Logs – The standard operation procedures included as Attachment A in the WPA do not indicate if soil bore logging will occur. Please include soil bore logs with the report requested below documenting investigation activities. Additionally, ACDEH requests the inclusion of screening level readings (e.g. from a photoionization detector -PID) on the soil bore logs.

3. Soil Sample Collection – The LTCP provides maximum concentrations of petroleum constituents in shallow soil that enable a site to qualify as a low threat to human health with respect to direct contact with contaminated soil or inhalation of contaminants volatilized to outdoor air. In order to evaluate site conditions in conjunction with the LTCP and in addition to the GGW samples identified in the WPA, ACDEH requests collection of soil samples from all soil bores for submittal for laboratory analysis. In accordance with the LTCP, soil samples should be collected from within the 0- to 5-foot and within the 5- to 10-foot intervals.

ACDEH recommends that soil samples should 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.

4. Scope of Analysis – The SCM states the potential constituents of concern (PCOCs) are TPHd, TPHo, TPH as gasoline (TPHg), benzene, toluene, ethylbenzene, and xylenes (BTEX), naphthalene, VOCs, and SVOCs. ACDEH requests that all soil and GGW samples be analyzed for these constituents. Additionally, based on reporting of anti-freeze disposal to the storm drain, ACDEH requests ethylene glycol be analyzed for soil and GGW samples collected from the two soil bores associated with the storm drain evaluation.

Based on the nature of the discharge(s) at the site, ACDEH requests the inclusion of the five LUFT metals - cadmium (Cd), chromium (Cr), lead (Pb), nickel (Ni) and zinc (Zn) - be included in the analysis of all soil samples.

5. Sensitive Receptor Survey – In addition to the proposed survey for nearby wells and other potential sensitive receptors, ACDEH requests that a determination be made of the outfall location of the storm drain in the event the drain is determined to be a preferential pathway.

6. Reporting – ACDEH requests summary tables provided in the report requested below identify:

- A. Concentrations exceeding the applicable LTCP criteria;
- B. For analyte concentrations not addressed in the LTCP, concentrations that exceed the San Francisco Bay Regional Water Quality Control Board (SFBR-RWQCB) Tier 1 Environmental Screening Levels (ESLs); and
- C. Analyte concentrations documented below the laboratory reporting limit (LRL) where the LRL exceeds the applicable LTCP criteria or Tier 1 ESL.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH ftp site (Attention: Keith Nowell), and to the State Water Resources Control Board's Geotracker website, in accordance with Attachment 1 and the following specified file naming convention and schedule:

- **January 27, 2017** – Work Plan Addendum (Figure 2); provided as an electronic mail attachment to: keith.nowell@acgov.org
- **90 Days After Well Location Approval** – Soil and Groundwater Investigation Report (File to be named: RO2934_SWI_yyyy-mm-dd)

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

Please note that ACDEH has updated its Attachment 1 with regard to report submittals to ACDEH. ACDEH will now be requiring a Submittal Acknowledgement Statement, replacing the perjury statement, as a cover letter signed by the Responsible Party (RP). The language for the Submittal Acknowledgement Statement is as follows:

"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."

Please make this change to your submittals to ACDEH.

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

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Enclosures: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations &
ACDEH Electronic Report Upload (ftp) Instructions

cc: David Siegel, ERAS Environmental, Inc., 1533 B Street, Hayward, CA 94546
(Sent via electronic mail to: dave@eras.biz)

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.