



May 12, 2017

Steffi R. Zimmerman Trust
Care of: Mr. Bill Mouat (Sent via E-mail to: bandsm1@comcast.net)
3289 Loma Verdes Place
Lafayette, CA 94549-1805

Subject: Technical Report Request for Fuel Leak Case No. RO0002936 and GeoTracker Global ID T0600183099, Zimmerman Property, 3442 Adeline St., Oakland, CA 94608

Dear Mr. Mouat:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Updated Site Conceptual Model and Soil and Soil Vapor Investigation Report* (Report) dated November 15, 2016, prepared and submitted on your behalf by AEI Consultants (AEI). ACDEH staff noted the Report also included a work plan; consequently, ACDEH requested the upload of the Report as a Work Plan to Geotracker and the ACDEH's ftp site. The Work Plan was evaluated in conjunction with the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Thank you for submitting the Work Plan.

The referenced work plan proposes a series of actions with which ACDEH is in general agreement; however, in the interest of maximizing efficiency of the drilling event, the proposed scope of work is conditionally approved for implementation provided that all of the technical comments below are addressed and/or 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: karel.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- 1. Clarification of Chemicals of Concern:** According to the *UST Closure Report* dated March 21, 2000 prepared by Clearwater Group, Inc., a 3,750 gallon underground storage tank (UST) used for the storage of gasoline and diesel was removed on February 22, 2000. The product lines were located above the UST and a fuel pump island was not located on site. Because the UST had been used to store gasoline and diesel, the Chemical of Concern include: Total Petroleum Hydrocarbon as gasoline (TPHg), TPH as diesel (TPHd), benzene, toluene, ethylbenzene, and xylenes (BTEX), fuel oxygenates including methyl tert butyl ether (MTBE) and naphthalene.
- 2. Approved Work Plan Deviations and Exclusions:** The Work Plan included a list of Deviations and Exclusions 2 through 5, most of which were communicated by e-mail to ACDEH on October 14, 2016; however, the first deviation, exclusion of the nine soil borings, SB-33 through SB-41, was not communicated in advance and represents an alternate scope of work outside that which was described in the approved work plan or technical comments. Additionally, the only soil boring completed as proposed, SB-32, was not sampled as proposed, namely, samples collected from the most impacted sections of the two intervals. The soil sample collected from a depth of 10 feet was not analyzed, yet had the highest PID reading in the soil boring. For all future approved work including this work plan, ACDEH requires advanced notification of any alternate scope of work outside that described in the

approved work plan or approval letter's technical comments because unapproved work may not be reimbursed by the USTCF.

3. **Proposed Permanent Soil Gas Wells:** ACDEH is in general agreement with the proposed soil gas well locations VB-17 through VB-21 with the following conditions:
 - a. VB-4 and VB-5 as previously approved locations identified in the *Updated Site Conceptual Model and Soil and Data Gaps Investigation Work Plan* dated June 29, 2016 but delayed installation due to obtaining encroachment permits from the City of Oakland;
 - b. Please consult Appendix D, *Soil Gas Sampling in Low Permeability Soil* in DTSC's *Active Soil Gas Investigations Advisory* (July 2015) to enable successful collection of soil gas samples from VB-6 and other low flow soil gas wells.
 - c. ACDEH requests installation of an additional soil gas well located east of MW-3 and outside of the remedial excavation in the vicinity of side wall sample SW-7, which detected the maximum TPHg, TPH, and benzene concentrations found in the perimeter of the remedial excavation.
 - d. ACDEH acknowledges the need to minimize damage to the installed artificial turf inside the building by elimination of the soil boring of the boring/vapor well pair. However, utilizing partially backfilled soil borings for the installation of shallower soil vapor wells may adversely effect the quality of the soil vapor samples collected from the soil vapor wells in two ways, from the removal of undisturbed and potentially contaminated soil during the drilling process and introduction of preferential pathways that could have a permanent dilution effect on soil gas samples. For these reasons, ACDEH requests implementation of the June 29, 2016 *Updated Site Conceptual Model and Soil and Data Gaps Investigation Work Plan* strategy of installation of separate but twinned boring/vapor well pairs at all proposed locations, or at a minimum, in the outdoor locations, such as VB-17 and VB-18.
4. **Soil Vapor Sample Analysis with TO-17:** Soil vapor samples from VB-9 and VB-12 detected the maximum TPH-g results of 4,600,000 ug/m³ and 1,490,000 ug/m³ respectively, yet their respective naphthalene concentrations were less than 25 ug/m³ with a "Q" qualifier, indicating that the internal standard associated with the analyte exceeded acceptable limits. Consequently, the naphthalene concentrations detected in soil vapor wells VB-9 and VB-12 are unconfirmed and confirmation samples are necessary.
5. **Waste Handling:** Please include copies of the signed waste manifest(s) for the investigation-derived waste generated during the October 2016 drilling event and the upcoming drilling event with the Soil, Soil Vapor, and Groundwater Investigation Report requested below.
6. **Semiannual Groundwater Monitoring and Sampling:** ACDEH anticipates groundwater levels and groundwater contaminant concentrations to have been effected by the extremely wet winter just experienced in the San Francisco Bay Area. Please submit the Semiannual Groundwater Monitoring and Sampling Reports according to the schedule provided in the *Technical Reports Request* section below.
7. **Electronic Submittal of Information (ESI) Compliance:** Currently, site data and documents are maintained in two separate electronic databases – ACDEH's File Transfer Protocol (FTP) site and the SWRCB's Geotracker website. Both databases act as repositories for Portable Document Format (PDF) files of regulatory directives and reports, but only Geotracker has the functionality to store electronic compliance data in Electronic Deliverable Format (EDF) including analytical laboratory data for soil, vapor and water samples, monitoring well depth-to-water measurements, and surveyed location and elevation data for permanent sampling locations. Although the SWRCB is responsible for the overall operation and

maintenance of the Geotracker System, ACDEH, as lead regulatory agency, is responsible to ensure that the Geotracker database is complete and accurate for sites regulated by ACDEH under the Local Oversight Program (LOP) and Site Cleanup Program (SCP) (SWRCB March 2011 document entitled *Electronic Reporting Roles and Responsibilities*).

A review of the case file indicates that the SWRCB Geotracker database and/or the ACDEH database is not complete, thus rendering the site to a non-compliant status pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3890 to 3895. At present missing data and documents include, but may not be limited to:

- analytical data for soil, water and vapor samples collected for the purpose of subsurface investigation or remediation, including influent/effluent water samples from remediation systems (EDF files). Specifically, soil and soil vapor analytical results from the October 2016 investigation have not been uploaded to Geotracker;
- complete copies of reports, in pdf format, including the signed transmittal letter and professional certification (GEO_REPORT files);
- surveyed elevation measurements to the top of well casings (GEO_Z files);
- the latitude and longitude (GEO_XY files) of any permanent monitoring well for which data is reported in EDF format;
- depth-to-water information for permanent sampling points whenever the data is collected, even if the well is not sampled during the sampling event (GEO_WELL files);
- stand alone site maps displaying tank locations, streets bordering the facility, and sampling locations for all soil, water and vapor samples (GEO_MAP files);
- stand alone boring logs with depth to the screened interval and the length of screened interval for any permanent monitoring well installed (GEO_BORE files);

TECHNICAL REPORTS REQUEST

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

- **May 19, 2017** – Semiannual Groundwater Monitoring and Sampling Report, 2nd Half 2016
File to be named: RO2936_GWM_R_YYYY-mm-dd
- **July 12, 2017** – Site Conceptual Model and Soil, Soil Vapor, and Groundwater Investigation Report
File to be named: RO2936_SCM_SWI_R_YYYY-mm-dd
- **August 15, 2017** – Semiannual Groundwater Monitoring and Sampling Report, 1st Half 2017
File to be named: RO27_GWM_R_YYYY-mm-dd
- **February 15, 2018** – Semiannual Groundwater Monitoring and Sampling Report, 2nd Half 2017
File to be named: RO27_GWM_R_YYYY-mm-dd
- **August 15, 2018** – Semiannual Groundwater Monitoring and Sampling Report, 1st Half 2018
File to be named: RO27_GWM_R_YYYY-mm-dd

Mr. Bill Mouat
RO00002936
May 12, 2017, Page 4

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. Should you have any questions or concerns regarding your case, please send me an e-mail message at karel.detterman@acgov.org or call me at (510) 567-6708. Online case files are available for review at the following website: <http://www.acgov.org/aceh/lop/ust.htm>

Sincerely,

Karel Detterman, P.G.
Hazardous Materials Specialist

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

cc: Trent Weise, AEI Consultants, (Sent via E-mail to: tweise@aeiconsultants.com)
Jonathan Sanders, AEI Consultants, (Sent via E-mail to: jsanders@aeiconsultants.com)
Peter McIntyre, AEI Consultants, (Sent via E-mail to: pmcintyre@aeiconsultants.com)
Dilan Roe, ACDEH, (sent via e-mail to: dilan.roe@acgov.org)
Karel Detterman, ACDEH, (sent via e-mail to: karel.detterman@acgov.org)
Paresh Khatri, ACDEH, (sent via e-mail to: paresh.khatri@acgov.org)
Case 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

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 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.