

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

REBECCA GEBHART, Acting Director

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

March 7, 2016

Arkansas Bandag Corporation
PO Box 10048
Fort Smith AR 72917

Mr. Mike Rogers
ABF Freight Systems, Inc.
PO Box 10048
Fort Smith AR 72917
(sent via electronic mail to mrogers@arcb.com)

Subject: Request for Landowner Form and Modified Work Plan Approval; Fuel Leak Case No. RO0003033 and GeoTracker Global ID T0600100018, and Site Cleanup Program Case No. RO0003134 and GeoTracker Global ID T00000005825; ABF Freight Systems and ABF Freight Maintenance Shop, 4575 Tidewater Avenue, Oakland, CA 94601

Dear Mr. Rogers:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file for the above-referenced site, including the *Indoor Air Sampling Work Plan*, dated January 14, 2016. The work plan was prepared and submitted on your behalf by the Trinity Source Group, Inc (Trinity). Thank you for submitting the work plan.

The work plan proposed the collection of one indoor air 24-hour sample in close proximity to sub-slab sample location SVP-2, which reported sub-slab Tetrachloroethene (PCE) concentrations of 530 and 901 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) during two sampling events approximately 6 months apart. Using the indoor air Environmental Screening Level (ESL) for PCE as promulgated by the San Francisco Bay Regional Water Quality Control Board (RWQCB; December 2013), and the standard Department of Toxic Substance Control (DTSC) attenuation factor of 0.05, allowable sub-slab vapor concentrations can be calculated to be $60 \mu\text{g}/\text{m}^3$, for a commercial facility. The work plan also proposed the concurrent collection of an ambient outdoor air sample and the collection of one sub-slab vapor sample from SVP-2 immediately after completion of the collection of the indoor air sample. The collection of an additional essentially concurrent sub-slab vapor sample will allow the calculation of a site specific attenuation factor across the concrete slab.

Please also be aware that new ESLs (February 2016) have been promulgated by the RWQCB and these may affect the site.

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 implementation, unless an alternate scope of work outside that described in the Work Plan 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 (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- 1. List of Landowners Form** – Please be aware that this request from the previous directive letter dated November 10, 2015, is incomplete. In order to capture any property ownership changes since the previous form was submitted, the initiation of a public comment period cannot begin until the form is returned. Pursuant to Section 25297.15 (a) of the California Health and Safety Code, ACDEH, the

local agency, shall not consider cleanup or site closure proposals from the primary or active responsible party, issue a closure letter, or make a determination that no further action is required with respect to a site upon which there was an unauthorized release of hazardous substances from an underground storage tank subject to this chapter unless all current record owners of fee title to the site of the proposed action have been notified of the proposed action by the primary or active responsible party. ACDEH is required to notify the primary or active responsible party of their requirement to certify in writing to the local agency that the notification requirement in the above-mentioned regulation has been satisfied and to provide the local agency with a complete mailing list of all record fee title owners.

To satisfy this requirement, please complete the enclosed *List of Landowners Form*, and mail it back to ACDEH by the date identified below.

2. **Conditional Work Plan Approval** – 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. The requested modifications are somewhat open ended in order to allow flexibility in the field, in order to quicken the delineation of soil contamination at the site. Please submit a report by the date specified below.
 - a. **Use of Shroud** – In conformance with DTSC guidelines, ACDEH requests the use of a shroud during the collection of the sub-slab vapor sample. A simple shroud is designed to isolate the sampling apparatus from ambient air conditions, and to allow the accumulation of a sufficient tracer volume in the shroud to determine if the sub-slab well is tight and a leak is not present.
 - b. **Shroud Tracer Concentrations** – Also in conformance with DTSC guidelines, ACDEH requests the collection and analysis of the tracer concentration in the shroud. DTSC guidance allows a determination if the vapor well leakage rate is acceptable.
 - c. **Vapor Flux Rate Variations** – In order to determine changes in the rate of vapor flux across the concrete slab at the site, DTSC guidance additionally indicates that multiple indoor air sampling events are necessary. In the report requested below, please identify additional sampling intervals or events to occur at the site.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH 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:

- **April 1, 2016** – Return of *List of Landowners Form*
- **May 20, 2016** – Vapor Intrusion Investigation
File to be named: RO3033_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.

If you have any questions, please call 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

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

Attachment 2 - *List of Landowners Form*

cc: Debra Moser, Trinity Source Group, Inc, 119 Encinal Street, Santa Cruz, CA 95060, (sent via electronic mail to djm@tsgcorp.net)

Eric Choi, Trinity Source Group, Inc, 119 Encinal Street, Santa Cruz, CA 95060, (sent via electronic mail to ejc@tsgcorp.net)

Dilan Roe, ACDEH, (sent via electronic mail to dilan.roe@acgov.org)

Mark Detterman, ACDEH, (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.

LIST OF LANDOWNERS FORM

County of Alameda
Environmental Health Services
Environmental Protection
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR:

Site Name: ABF Freight Systems
Address: 4575 Tidewater Avenue
City, State, Zip: Oakland, CA 94601
Record ID #: RO0003033

Please fill out item 1 if there are multiple site landowners (attach an extra sheet if necessary). If you are the sole site landowner, skip item 1 and fill out item 2.

1. In accordance with Section 25297.15(a) of Chapter 6.7 of the California Health & Safety Code, I, _____ (name of primary responsible party), certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site:

Name: _____
Address: _____
City, State, Zip: _____
E-mail Address: _____

Name: _____
Address: _____
City, State, Zip: _____
E-mail Address: _____

Name: _____
Address: _____
City, State, Zip: _____
E-mail Address: _____

2. In accordance with Section 25297.15(a) of Chapter 6.7 of the California Health & Safety Code, I _____, certify that I am the sole landowner for the above site.

Sincerely,

Signature of Primary
Responsible Party

Printed Name

Date

E-mail Address