



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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June 1, 2015

The Salvation Army
601 Webster Street
Oakland CA 94607
Attn.: Major Jack Phillips
(Sent via Email to Jack.phillips@usw.salvationarmy.org)

Subject: Soil and Groundwater Investigation Work Plan Addendum; Fuel Leak Case No. RO0003084 and Geotracker Global ID T10000003428, The Salvation Army, 601 Webster St, Oakland CA 94607

Dear Major Phillips:

Alameda County Environmental Health (ACEH) staff has reviewed the February 24, 2015 *Work Plan for Continued Subsurface Investigation (Work Plan)* prepared by Cardno ATC Associates (Cardno) and received by our office on March 16, 2015. The Work Plan was prepared to address items presented in the ACEH correspondence dated December 24, 2014. The Work Plan was reviewed against the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP).

ACEH is in general agreement with the proposed scope of work. The proposed scope of work may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed.

TECHNICAL COMMENTS

- 1. Source Area** — The Work Plan proposes to advance one membrane interface probe (MIP) boring in the location of the former underground storage tank (UST) pit, and no hollow stem auger (HSA) borings are proposed within the tank pit footprint. The initial Cardno investigation, published in January 13, 2014, was unsuccessful in recovering soil samples with the upper 10 feet of soil in tank pit soil bores SB-1 and SB-2. Additionally, of the limited soil samples that were recovered, tank pit soil boring SB-1 did not encounter significant soil concentrations of total petroleum hydrocarbons (TPH) and TPH constituents benzene, toluene, ethylbenzene, and xylenes (BTEX); however, the TPH concentrations in the grab groundwater sample from SB-1 are indicative of free phase product. Based on these findings, ACEH is of the opinion the former tank pit is inadequately characterized, and it appears to ACEH that the secondary source has not been removed.

Therefore, please advance two additional HSA borings within the footprint of the former UST footprint. Please ensure soil samples are collected on the 0 to 5 and the 5-10-foot intervals in order to characterize the site under the LTCP. In addition to the sample depths outlined in the Work Plan, ACEH requests sample collection within two different depths within the 0-5-foot and at least one within 5-10 feet bgs interval from each boring in the source area. In accordance with the LTCP, sample analysis should include BTEX and naphthalene.

Figure 5 of the Work Plan depicts four HSA boring locations in the near vicinity of the former tank pit, identified by the coordinates J2, J5, M2, and M5. These near-source soil bores should also be sampled as requested above.

- 2. Soil Sample Collection** — The Work Plan states that no fewer than four soil samples from each boring will be selected for submittal for laboratory analyses; that soil samples will generally be collected at five foot intervals and at the soil and groundwater interface. Additional soil samples may be selected and submitted for laboratory analyses if significant changes in lithology are encountered and/or at signs of contamination (odor, discoloration, PID responses, etc.) If there are signs of vadose zone contamination in a particular boring, additional soil samples will be selected for analyses from the interval between ten feet bgs and first encountered groundwater.

Since the goal of this investigation is to determine the lateral, down gradient, and vertical extent of total petroleum hydrocarbon (TPH) contamination in soil and groundwater beneath the site in accordance with the LTCP, ACEH requests that soil samples be collected and analyzed at intervals with in the upper five feet, areas of obvious contamination, the soil/groundwater interface, and at significant changes in lithology, and at intervals not to exceed five feet. 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. Please ensure that the analytical results define the vertical and horizontal extent of TPH contamination at the site.

- 3. Monitoring Well Installation** — The Work Plan states a minimum of three groundwater monitoring wells will be installed within the truck enclosure as depicted on Figure 6 of the Work Plan. ACEH generally concurs with the placement of these wells. ACEH should be consulted prior to well re-location should field conditions dictate the proposed locations are unsuitable.

Additionally, the Work Plan states a fourth well could be located across Franklin Street if information obtained during the MIP and HSA soil boring phases suggests the dissolved phase PHC plume extends to this parcel. ACEH should be provided the MIP and HSA data for review by the date specified below, prior to discussing the proposed additional wells. Additional groundwater monitoring wells should be installed only after consultation with and approval from ACEH.

- 4. Soil Gas Sampling** — ACEH generally concurs with the proposed collection of soil gas samples, as stated in ACEH's letter dated December 12, 2014. However, ACEH is of the opinion that it is premature to collect soil gas samples until the depth to groundwater (DTW) has been established. Therefore, ACEH recommends the installation of the proposed wells to establish DTW. Following a review of the DTW data along with depth of foundation data, please consult with ACEH, by the date specified below, for the most suitable soil gas collection methodology and analytical test methods. Soil gas sampling should not be conducted prior to ACEH review and approval.

NOTIFICATION OF FIELDWORK ACTIVITIES

Please provide ACEH with at least three (3) business days notification prior to conducting the fieldwork.

TECHNICAL REPORT REQUEST

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

- **August 28, 2015** – Review and Discussion of HSA Data; provided via email Attn.: Keith Nowell
- **September 24, 2015** – Review and Discussion of Monitoring Well Data; provided via email Attn.: Keith Nowell
- **November 18, 2015** Soil, Groundwater, and Soil Gas investigation. File to be named: RO0003084_SWI_R_yyyy-mm-dd

Thank you for your cooperation. ACEH 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

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

cc: Kaye Patterson, The Salvation Army USA Western Territory Offices, 180 East Ocean Blvd., 3rd Floor St, Long Beach, CA 94607 (*Sent via Email to kaye.patterson@usw.salvationarmy.org*)

Mike Sonke, Cardno ATC Associates Inc., 1117 Lone Palm Ave, Ste B, Modesto, CA 95351 (*Sent via Email to: mike.sonke@atcassociates.com*)

Jeanne Homsey, Cardno ATC Associates Inc., 1117 Lone Palm Ave, Ste B, Modesto, CA 95351 (*Sent via Email to: Jeanne.Homsley@atcassociates.com*)

Dilan Roe, ACEH (*Sent via E-mail to: dilan.roe@acgov.org*)

Keith Nowell, ACEH (*Sent via E-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

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.