



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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August 3, 2016

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

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

Dear Major Phillips:

Alameda County Department Environmental Health (ACDEH) staff has reviewed the case file including the recently submitted documents entitled *Revised Subsurface Investigation Work Plan* (Work Plan), dated February 24, 2015, *Report on Survey of Basement Elevation and Elevator Configuration* (SBE) dated May 24, 2016, and *Soil and Groundwater Investigation Report* (SWI), dated May 25, 2016. The documents were prepared by ATC Group Services LLC (ATC) for the subject site.

The Work Plan proposes to recover three (3) soil gas samples along a transect from underneath the Salvation Army building. However, ACDEH postponed collection of soil gas samples until after establishing the depth to water (dtw) and the depth of the basement at the subject site.

The SBE addresses the depth of the foundation slab of the Salvation Army building relative to the top of the casing (TOC) as measured relative to monitoring well MW-1, one of three (3) on-site groundwater monitoring wells installed as part of the work documented in the SWI. A fourth well, MW-4, was installed off-site. ATC determined the surface of the basement floor to be approximately 19.45 feet below the MW-1 TOC. The dtw in MW-1 was measured at 20.50 feet below its top of casing, while dtw in the other two on-site wells were measured at 18.91 and 19.08 feet below their TOCs in MW-2 and MW-3, respectively.

Based on the data collected in the SWI and SBE, ATC determined and that, assuming a basement slab thickness of one foot, groundwater is anticipated to be approximately 2.2 feet below the basement foundation bottom.

ACDEH is in general agreement with the proposed scope of work as presented in the documents referenced above. The proposed scope of work for the soil gas investigation 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. Soil Gas Sample Analysis** — Please analyze the soil gas samples using the EPA test method TO-15. Include in the analysis scope the following mixture and compounds: total petroleum hydrocarbons (TPH) as gasoline (TPHg), benzene, toluene, ethylbenzene, and xylenes (collectively BTEX), the fuel oxygenates methyl tertiary butyl ether (MTBE), diisopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), and tertiary butyl alcohol (TBA), and the lead scavengers 1,2-dibromroethane (EDB), and 1,2-dichloroethane (EDC), and naphthalene. ACDEH requests one duplicate sample be analyzed for naphthalene by test method TO-17.

ACDEH requests analysis for the biogenic gasses oxygen, carbon dioxide and methane, using test method ASTM-1946, in order to evaluate the potential biodegradation of the contaminant plume. Additionally, the soil gas samples should be analyzed for the trace gas used for leak detection.

Please ensure that your field sampling protocols are consistent with those described in the July 2015 *Advisory- Active Soil Gas Investigations* (Guidance) prepared by California Environmental Protection Agency/ Department of Toxic Substances Control (Cal EPA / DTSC), and the Regional Water Quality Control Boards of the Los Angeles (LARWQCB) and San Francisco (SFRWQCB) regions. Consistent with the Guidance, ACDEH requires installation of semi-permanent vapor wells to assess temporal and seasonal variations in soil gas concentrations.

- 2. Soil Gas Sample Points** — As the soil gas sampling points will be resampled to assess temporal and seasonal variations, they meet the GeoTracker definition of a permanent sample point. Therefore, according to the Electronic Reporting Regulations (Chapter 30, Division 3 of Title 23 & Division 3 of Title 27, CCR), the soil gas points are required to be surveyed to a NAD 83 Datum.

Please ensure upload to GeoTracker a GEO\_BORE documenting the construction of each soil gas sampling point in addition to the GEO\_XY and GEO\_Z files.

- 3. Soil Gas Sample Frequency** — ACDEH requests collection of soil gas samples coincide with the quarterly groundwater monitoring discussed below. Results of the soil gas sampling may be included in the groundwater monitoring reports.
- 4. Elevator Sump Water Collection and Sample Analysis** — The SBE documented the presence of water in the sump of the freight elevator. ACDEH requests the recovery of elevator sump water samples from the elevator sumps that contain water. Please analyze the sump water samples for TPH as diesel (TPHd) by EPA test method 8015, and TPHg, BTEX, MTBE, DIPE, ETBE, TAME, TBA, EDB, EDC, and naphthalene by EPA test method 8260. Additionally, please include TPH as hydraulic oil (by EPA test method 8015) to the list of analytes for the sump water samples.
- 5. Quarterly Groundwater Monitoring** — Please continue with the quarterly monitoring of the four (4) well groundwater monitoring network and submit the monitoring reports by the dates specified below. Following a year of continuous quarterly monitoring, ACDEH will review the data and decide whether or not to modify the sampling frequency.

### **NOTIFICATION OF FIELDWORK ACTIVITIES**

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

### **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:

- **September 24, 2016:** Third Quarter Groundwater Monitoring Report. File to be named: RO0003084\_GWM\_R\_YYYY-MM-DD
- **November 1, 2016:** Soil Gas Investigation. File to be named: RO0003084\_SWI\_R\_YYYY-MM-DD
- **January 22, 2017:** Fourth Quarter Groundwater Monitoring Report. File to be named: RO0003084\_GWM\_R\_YYYY-MM-DD

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](mailto:keith.nowell@acgov.org)

Sincerely,

Keith Nowell, PG, CHG  
Hazardous Materials Specialist

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

cc: Kaye Patterson, The Salvation Army USA Western Territory Offices, 180 East Ocean Blvd., 3<sup>rd</sup>  
Floor St, Long Beach, CA 94607 (*Sent via electronic mail to*  
[kaye.patterson@usw.salvationarmy.org](mailto:kaye.patterson@usw.salvationarmy.org))

Mike Sonke, ATC Group Services LLC, 1117 Lone Palm Ave, Ste B, Modesto, CA 95351 (*Sent*  
*via electronic mail to:* [mike.sonke@atcassociates.com](mailto:mike.sonke@atcassociates.com))  
Gabe Stivala, ATC Group Services LLC, 915 Highland Pointe Drive, Suite 250, Roseville, CA  
95678 (*Sent via electronic mail to:* [gabe.stivala@atcassociates.com](mailto:gabe.stivala@atcassociates.com))

Dilan Roe, ACDEH (*Sent via electronic mail to:* [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))  
Keith Nowell, ACDEH (*Sent via electronic mail to* [keith.nowell@acgov.org](mailto: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/](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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> May 15, 2014
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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](mailto: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](mailto: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.