

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
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

June 15, 2017

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

Subject: Report Review for 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 of Environmental Health (ACDEH) staff has reviewed the case file including the recently submitted documents entitled *Sensitive Receptor Survey Update Report (SRS)*, dated January 25, 2017 and the *Quarterly Groundwater Monitoring and Vapor Monitoring and Site Status Report- First Quarter, 2017 (GWM)*, dated March 24, 2017, and associated electronic submittals to the State Water Resources Control Board's (SWRCBs) GeoTracker website. The submittals were prepared by ATC Group Services LLC (ATC) for the subject site.

The SRS documented one irrigation well, three potential supply wells, and two cathodic protection wells within 2,000 feet of the site. ACDEH had requested inclusion of the cathodic protection wells in the survey as they may provide a vertical conduit should they be located within the contaminant plume.

The GWM included the presentation of the groundwater analysis results for sampling conducted on February 13, 2017 for the groundwater monitoring well network. The well network, consisting of three on-site and one off-site wells, are currently sampled quarterly. The GWM documents the activities, findings, and recommendations for the monitoring event, which includes groundwater from on-site well MW-1 reported having concentrations of 29,000 micrograms per liter ($\mu\text{g/L}$) total petroleum hydrocarbons as gasoline (TPHg), 6,700 $\mu\text{g/L}$ benzene (B), and 760 $\mu\text{g/L}$ ethyl benzene (E), and concentrations of 4,700 $\mu\text{g/L}$ TPHg, 1,000 $\mu\text{g/L}$ B, and 37 $\mu\text{g/L}$ E in downgradient well MW-4.

Additionally, the GWM documents the second round of soil vapor collection from three sub-slab soil vapor points located within the basement of the Salvation Army building. ATC stated the soil vapor samples collected from beneath the basement floor of the building contain both leaking underground fuel tank (LUFT)-related and chlorinated volatile organic compounds (CVOCs); however, all detected concentrations are below their respective Environmental Screening Levels (ESLs). The source of the CVOCs not known.

Based on its findings, ATC recommends the following:

- Continue to sample and analyze groundwater samples from the monitoring well network on the existing quarterly groundwater sampling schedule
- Continue to attempt to collect separate-phase petroleum hydrocarbon (PHC) recovery in MW-3 using the installed passive skimmer;
- Discontinue the analysis of collected groundwater samples for organic lead;
- Continue to develop the Conceptual Site Model for the site by expanding the downgradient groundwater investigation of the extent of benzene existing in concentrations in excess of their respective ESLs, and

- Work plan preparation for the continued definition and quantification of the petroleum hydrocarbon adsorbed mass in the source area; delineation of the dissolved phase PHC downgradient of the site, and continued evaluation of the risks represented by the PHC mass in the source area and dissolved phase PHC downgradient of the site

Based on the review of the case file, ACDEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

1. **ESI Submittal** — The GWM was resubmitted to GeoTracker with a revised Table X-Table 6. However, the revised report was not submitted to the ACDEH FTP site. ACDEH requests the submittal of the revised report to our FTP site by the date specified below. Additionally, we request that future submittal of revised reports include a revision date and include the rationale for the revision in the opening paragraph.
2. **Sampling Frequency** — ACDEH concurs that groundwater and soil vapor monitoring continue on a quarterly basis for the foreseeable future as the significant rainfall this past season and the elevated groundwater levels may affect concentrations of potential chemicals of concern.
3. **Free Product Recovery** — ACDEH concurs with continued efforts be made to recover separate phase PHC. The elevated the groundwater levels reported for the February event may have inhibited the influx of separate phase PHC, as evidenced by a sheen appearing in two of the wells during the purge process.
4. **Scope of Analysis** — ACDEH is in general agreement that organic lead may be eliminated from the scope of analysis. Additionally, as concentrations of the fuel oxygenates diisopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), and tertiary butyl alcohol (TBA) have not been documented above the laboratory reporting limit in soil and water samples collected to date, these compounds may also be eliminated from the scope of analysis. Concentrations of the lead scavenger 1,2-dichloroethane (1,2-DCA) have been reported; therefore, ACDEH requests that 1,2-dibromoethane (EDB) be retained on the list of analytes, though it has yet to be identified at the site.

Please add TPHg to the scope of analysis for the soil vapor samples.

5. **Groundwater Plume Delineation** — Based on the reported concentrations in groundwater at the MW-4 location, it appears the contaminant plume is not defined. Therefore, ACDEH is in general agreement with ATC's recommendation for work plan preparation as outlined in the GWM. Please submit the investigation work plan by the date specified below.

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.

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:

- **June 29, 2017:** Submittal of revised Quarterly Groundwater Monitoring and Vapor Monitoring and Site Status Report- First Quarter, 2017 to the ACDEH FTP site (Attention: Keith Nowell)
- **July 28, 2017:** Second Quarter 2017 Groundwater and Soil Vapor Monitoring Report. File to be named: RO0003084_GWM_R_yyyy-mm-dd
- **August 15, 2017:** Work Plan for Site Characterization and Plume Delineation. File to be named: RO0003084_WP_R_yyyy-mm-dd
- **October 28, 2017:** Third Quarter 2017 Groundwater and Soil Vapor 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

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., 3rd
Floor St, Long Beach, CA 94607 (*Sent via electronic mail to*
kaye.patterson@usw.salvationarmy.org)

Timothy Rockey, The Salvation Army, 94607 (*Sent via electronic mail to*
timothy.rockey@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)
Gabe Stivala, ATC Group Services LLC, 915 Highland Pointe Drive, Suite 250, Roseville, CA
95678 (*Sent via electronic mail to:* gabe.stivala@atcassociates.com)

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.