

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

October 24, 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: Conditional Work Plan Approval; 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 document entitled *Work Plan for Site Assessment Fall 2017* (Work Plan) dated September 22, 2017 and prepared by ATC Group Services LLC (ATC) for the subject site.

As presented in the Work Plan, ATC proposes to further delineate the lateral distribution of the dissolved phase petroleum hydrocarbon (PHC) contamination with the use of a passive soil gas (PSG) survey. ATC proposes the installation of 34 PSG samplers set at a depth of 36 inches below the ground surface (bgs). The samplers will be installed in a grid pattern and include the source area (the former underground storage tank- UST- pit), beneath The Salvation Army (TSA) Adult Rehabilitation Center (ARC) building, and across Franklin Street at the TSA parking lot.

The PSG samplers will be left in place for a residence time of approximately two weeks. Following retrieval, the samplers will be analyzed for benzene, toluene, ethylbenzene, xylenes (BTEX), methyl tertiary-butyl ether (MTBE), tertiary butyl alcohol (TBA), di-isopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), 1,2-dichloroethane (1,2-DCA), ethyl dibromide (EDB), naphthalene and the chlorinated compounds detected previously at the site (including tetrachloroethene, trichloroethene, chloromethane, methylene chloride) using U.S. EPA Method 8260C.

Following a review of the analytical data, ATC will propose soil borings and/or monitoring wells, advanced by hollow stem auger (HSA) methodology, to confirm lateral extent of PHCs reported in the PSG survey report. ATC will discuss the number and location of wells with the ACDEH prior to installation.

Based on ACDEH staff review of the referenced documents and of the case file we generally concur with the recently proposed scope of work. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below. Please provide 72-hour advance written notification to this office (electronic mail preferred to: keith.nowell@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **ESI Submittal** — Our review of the case file indicates that the State Water Resources Control Board (SWRCB) GeoTracker 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. In order to regain compliance status, ACDEH requests submittal of reports and/or

supporting documents missing from the GeoTracker database be uploaded by the date specified below. Please provide ACDEH with a list of the submitted documents via electronic mail to: keith.nowell@acgov.org.

2. **Background** — ACDEH notes the more recent documents prepared for the case have a site history which commences with the 2010 UST removal. ACDEH requests the site history section be expanded to include a discussion of the previous generation of USTs, such as presented in the work plan prepared by ATC dated March 18, 2011.
3. **Residence Time** — ATC indicates the PSG samplers will be installed for a period of approximately two weeks. ACDEH notes that this may be an appropriate residence time under the current site conditions. However, the residence time may be weather dependent. Therefore, ACDEH requests the firm providing the samplers be contacted regarding the appropriated residence time should changes in the current weather conditions occur.
4. **Soil Bores and Wells** — ATC states that the number and location of wells to be installed will be discussed with ACDEH prior to installation. ACDEH requests the proposed number and location of soil bores be included in the discussion. Please present the findings of the PSG investigation to our office, via electronic mail to: keith.nowell@acgov.org for our review prior to the discussion of the proposed number and location of wells. Include the rationale for the HSA locations with the PSG investigation findings.
5. **ARC Building Monitoring Points** — As depicted on Figure 3 of the Work Plan, ATC proposes to install at least three PSG samplers beneath the ARC building. ACDEH requests clarification on the type of monitoring point that may be installed based on the findings of the PSG investigation, e.g. bore, well, soil vapor point or sub-slab vapor pin. Please include a description of the proposed monitoring point, if any, that would be installed beneath the building with the PSG investigation findings requested below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH FTP site (Attention: Keith Nowell), and to the SWRCB's GeoTracker website, in accordance with Attachment 1 and the following specified file naming convention and schedule:

- **November 27, 2017:** Electronic Submittal of Information (to GeoTracker)
- **November 27, 2017:** List of Geotracker submittals (submitted via electronic mail to ACDEH, Attention: Keith Nowell)
- **30 days following receipt of PSG analysis:** PSG Investigation Findings. (submitted via electronic mail to ACDEH, Attention: Keith Nowell)
- **14 days following submittal of PSG Investigation Findings:** Meeting with ACDEH regarding Well/Bore Installation.

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., 3^d
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.