

ALAMEDA COUNTY
**HEALTH CARE SERVICE
AGENCY**

COLLEEN CHAWLA, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY, SUITE 250
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

May 14, 2018

Mr. Loyal and Ms. Mary Moore
30689 Prestwick Avenue
Hayward, CA 94544-7331
(Sent via e-mail to: loyalmary75@yahoo.com)

Mr. Pedro and Ms. Maria Pulido
22762 Moura Court
Hayward, CA 94541-3279
(Sent via e-mail to: edsliquor@yahoo.com)

Ms. Carryl MacLeod
Chevron Environmental Management Co.
6001 Bollinger Canyon Road
San Ramon, CA 94583-5177 (Sent via e-mail to: CMacleod@chevron.com)

Subject: Fuel Leak Case No. RO0003098 and GeoTracker Global IDT10000004218, Ed's Liquor Store, 2700 23rd Avenue, Oakland, CA 94606-3530

Ladies and Gentlemen:

Alameda County Department of Environmental Health (ACDEH) and State Water Resources Control Board (SWRCB) staff discussed a path to closure in a conference call held January 31, 2018. ACDEH and SWRCB staff have agreed that the case does not meet the SWRCB's Low Threat Underground Storage Tank Case Closure Policy (LTCP) Media-Specific Criteria for Groundwater because a groundwater monitoring well has not been installed off site and downgradient to define the extent of the plume beneath the residential area south of East 27th Street.

TECHNICAL COMMENTS

A *Data Gap Work Plan* dated May 15, 2017 prepared and submitted on your behalf by GHD was conditionally approved in ACDEH's July 14, 2017 Directive Letter. The *Data Gap Work Plan* described the installation of one off-site groundwater monitoring well and soil vapor probe. In November 2017 ACDEH was informed of a change in consultants to Arcadis. ACDEH requests implementation of the *Data Gap Work Plan* with the modifications discussed with the SWRCB and described below. Submittal of a revised work plan is not required unless an alternate scope of work is proposed outside the scope of work described in the following technical comments. Due to the change in consultants, please also include the standard operation procedures (SOPs) for soil boring, well installation, well development, well survey, and soil and groundwater sampling. We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: karel.detterman@acgov.org) prior to the start of field activities.

- 1. Proposed Groundwater Monitoring Well Location:** Please install one groundwater monitoring well in the sidewalk/grass patch on the south side of East 27th Street in front of house number 2309. Please have the well professionally surveyed with a California-licensed surveyor.
- 2. Groundwater Monitoring and Sampling:** Upon installation and development of the new monitoring well, please sample the new well monitor on a quarterly basis, to detect contaminant fluctuations during wet and dry seasons, for a minimum of three quarters and tag depth to water in all wells to determine the groundwater gradient. Please provide quarterly reports 30 days after analytical results are received.

3. **Proposed Groundwater Analyses:** Please analyze the groundwater samples for Total Petroleum Hydrocarbons as gasoline (TPHg), TPH as diesel (TPHd), TPH as motor oil (TPHmo), benzene, toluene, ethylbenzene, and xylenes (BTEX).
4. **Waste Management Documentation:** Please include documentation describing characterization and disposal of investigation-derived soil and groundwater waste with the Report requested below.

TECHNICAL REPORT REQUEST

Please upload the following technical reports to the ACDEH ftp site (Attention: Karel Detterman) and to the State Water Resources Control Board's GeoTracker website:

- **July 20, 2018** Soil and Groundwater Investigation and 2nd Quarter Groundwater Monitoring and Sampling Report
RO0003098_SWI_GWM_R_yyyy-mm-dd
- **October 19, 2018** 3rd Quarter Groundwater Monitoring and Sampling Report
RO0003098_GWM_R_yyyy-mm-dd
- **January 21, 2019** 4th Quarter Groundwater Monitoring and Sampling Report
RO0003098_GWM_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.

Should you have any questions, please contact me at (510) 567-6708 or send me an electronic mail message at karel.detterman@acgov.org

Sincerely,

Karel Detterman, PG
Hazardous Materials Specialist

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

cc: Katherine Szymanowski, Arcadis U.S. Inc., 2300 Clayton Road, Suite 400, Concord, CA 94520,
(Sent via E-mail to: Katherine.Szymanowski@arcadis.com)

Karel Detterman, ACDEH, (Sent via E-mail to: karel.detterman@acgov.org)
Dilan Roe, ACDEH, (Sent via E-mail to: dilan.roe@acgov.org)
Paresh Khatri, ACDEH, (Sent via E-mail to: paresh.khatri@acgov.org)
Electronic File, GeoTracker

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

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 the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

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 and include the professional registration stamp, signature, and statement of professional certification. 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

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.