



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

April 7, 2015

Kyle Milligan and Susan Casentini Trust
388 Belmont Street
Oakland, CA 94610-4821
(Sent by e-mail to casentini20@hotmail.com)

Subject: Closure Addendum Request for Fuel Leak Case No. RO0003125 and GeoTracker Global ID T10000005131, Milligan & Casentini Property, 385 26th Street Avenue, Oakland, CA 94612

Dear Ladies and Gentlemen:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Site Investigation Report and Request for No Further Action* (RFC) dated January 5, 2015, prepared and submitted on your behalf by Cook Environmental Services, Inc. (CES). Thank you for submitting the RFC.

ACEH has evaluated site data and recommendations presented in the above-mentioned report, in conjunction with the case files, and the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) and other regulatory guidance for cleanup of chlorinated solvents. Our review indicates that petroleum hydrocarbon fuel release portion of the site may be eligible for closure under the LTCP policy. However, prior to making a final closure determination, clarification is needed on methane soil gas results reported in the RFC, as discussed in the following Technical Comment 1. Please address Technical Comment 1 below in an RFC Addendum.

In addition to petroleum hydrocarbons, chlorinated hydrocarbons were also detected at the site in soil and groundwater. The RFC attributes the chlorinated hydrocarbons detected in SB-6 located in the southern portion of the site to a domestic laundry located adjacent and south of the site. However ACEH's review of the data indicates the source of the volatile organic compounds (VOCs) is unknown. Therefore, in order to address the non-petroleum hydrocarbon concentrations at the site, please address the items listed in Technical Comment 2 below in an RFC Addendum.

TECHNICAL COMMENT

- 1. Methane Concentrations in Soil Vapor Sample SV-2:** A methane concentration of 150 micro liters per liter (uL/L) was detected in soil vapor sample SV-2 at a depth of 5 feet. The location of SV-2 is adjacent to soil boring SB-3, in which Total Petroleum Hydrocarbon as diesel (TPHd) was detected in soil at the highest current site investigation concentration of 7,900 milligrams per kilogram (mg/kg) at 9.5 feet below ground surface (bgs). To verify that methane concentrations in soil gas are not in exceedance of methane's Lower Explosion Level (LEL), please revise Table 4 by adding a column showing the methane concentrations found in both soil vapor samples and include in a RFC Addendum. Please include an analysis of the methane generation potential from residual sources and associated explosive hazard risk.

2. **VOCs in Grab Groundwater Sample from in SB-6:** The VOCs 1,1-Dichloroethane (1,1 DCA), 1,2 Dichloroethane (1,2 DCA), 1,1 Dichloroethene (1,1 DCE), cis 1,2 Dichloroethene (cis 1,2 DCE), 1,1,2 Trichloroethane (1,1,2 TCA), and trichloroethene (TCE) were detected above their respective Environmental Screening Levels (ESLs) in a grab groundwater sample from boring SB-6 located approximately 80 feet south of the former redwood UST in the southern part of the site but were not detected in grab groundwater samples in the vicinity of the former redwood UST. The Sanborn Map included in the RFC shows infrastructure in the southern corner of the property near the location of SB-6. Consequently, it would appear that the UST was not a source of the VOCs and additional evaluation of the southern portion of the site must be presented in the RFC Addendum to preclude this area as a source of the chlorinated hydrocarbons.

Please assess vapor intrusion risk in the vicinity of SB-6 by evaluating the case using the San Francisco Bay Region's Regional Water Quality Control Board's draft Final July 31, 2009 *Assessment Tool for Closure of Low-Threat Chlorinated Solvent Sites* and include the evaluation in the RFC Addendum. Based on your evaluation, if warranted, please present a work plan in the RFC Addendum to fill identified data gaps.

TECHNICAL REPORT REQUEST

Please upload the technical report to the ACEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **June 8, 2015** – Request for Closure Addendum
File to be named: RO3125_RFC_ADDEN_R_YYYY-MM-DD

This report is 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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/lop/ust.htm>

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please send me an e-mail message at karel.detterman@acgov.org or call me at (510) 567-6708.

Sincerely,

Karel Detterman, PG
Hazardous Materials Specialist

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

cc: Tim Cook, Cook Environmental (Sent via e-mail to: tcook@cookenvironmental.com)
Dilan Roe, ACEH (Sent via E-mail to: dilan.roe@acgov.org)
Karel Detterman, ACEH (Sent via E-mail to: karel.detterman@acgov.org)
GeoTracker, Electronic Case 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.