



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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July 12, 2016

Mark A. Jacobson & Ilona J. Frieden
811 Paramount Road
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(Sent via email to: mjacobson@php.ucsf.edu)

James E. Allison & Margaret Linderstein
214 Highland Avenue
Piedmont, CA 94611
(Sent via email to: jallison@medsfgh.ucsf.edu)
(Sent via email to: mlinderstein@gmail.com)

Subject: Conditional Work Plan Approval; Fuel Leak Case No. RO0003143 (GeoTracker Global ID T10000006106), Paramount UST, 811 Paramount Road, Oakland, CA 94610

Dear Responsible Parties:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case files including the *Data Gap Investigation to Evaluate Potential Indoor Air Vapor Intrusion by Soil-Gas Related to a Former Residential Underground Heating Oil Tank*, dated May 17, 2016, submitted on your behalf by Stellar Environmental Solutions, Inc. (Stellar). Thank you for submitting the report.

Additional soil vapor testing of the soil vapor well at the referenced site continues to document consistent atypical vapor analytical results between soil vapor sampling events including substantial changes in Total Petroleum Hydrocarbons as gasoline (TPHg; at a heating oil site), benzene, ethanol, heptane, methylene chloride, tetrachloroethene (PCE), and toluene. PCE concentrations have risen from 94 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) to 7,500 $\mu\text{g}/\text{m}^3$, while leak tracer concentrations have remained within normal parameters. It has been surmised that the standard practice of using batch certified Summa canisters may be causing the consistently atypical results.

Indoor air samples have additionally detected naphthalene, of potential concern due to the potential for lateral migration from an unusually high concentration of naphthalene found in soil immediately adjacent and beneath the former underground storage tank (UST). Indoor air samples have also detected 1,4-Dichlorobezene (1,4-DCE) at concentrations above appropriate levels. The contaminant is understood to be commonly associated with disinfectants and pesticides. Concentrations were detected in the crawl space air sample (as a proxy for indoor air) at an moderately elevated concentration, and at higher concentrations in the finished basement air sample.

The report also contained recommendations for additional work, which can also be essentially considered a work plan. Based on ACDEH staff review of the recommendations, and assuming standard protocols previously used at the site are implemented, the recommended scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- 1. Work Plan Modifications** – ACDEH is in agreement that an additional round of indoor air vapor sampling is appropriate using individually certified Summa canisters, that a third indoor air location on the main living floor is appropriate, and that vapor analysis should include, but not be limited to (see below), TPHg, naphthalene, benzene, toluene, ethylbenzene, and total xylenes (BTEX), and 1,4-DCE. ACDEH requests the following modifications to the approach. Please submit a report by the date specified below.

- a. **Additional Soil Vapor Sampling** - To verify the assumption that batch Summa canister certification is the cause of the persistent atypical vapor analytical results, and is not representative of site specific contamination, it is appropriate to collect an additional round of soil vapor from vapor well SG-5.5, *using an individually certified Summa canister*.
- b. **Indoor Air Naphthalene Analysis** – In order to achieve a lower limit of detection for naphthalene, it is appropriate to analyze the indoor air samples by either TO-15 SIM or TO-17. The intent is to obtain detection limits similar or below the indoor air Environmental Screening Level (ESL) which has been used as the default cleanup objective.
- c. **Indoor Air TPHd Analysis** – In addition to TPHg, it is reasonable to request that vapor sampling in the basement include Total Petroleum Hydrocarbons as diesel (TPHd) in the analytical suite in order to determine if the contaminant has migrated laterally through soil to basement air, as may be happening with naphthalene.
- d. **Soil Sample for 1,4-DCE** – Should vapor or indoor air samples continue to detected moderately elevated concentrations of 1,4-DCE, it appears appropriate to collect near surface soil samples from several depths, from the crawl space, in an effort to identify a source. This is requested as a contingency to be based on the additional vapor resampling efforts. ACDEH is available for discussions should this be necessary.

TECHNICAL REPORT REQUEST

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

- **September 23, 2016** – Site Investigation Report
File to be named: RO3143_SWI_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.

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

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark Detterman, PG, CEG
Senior Hazardous Materials Specialist

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

cc: Henry Pietropaoli, Stellar Environmental Solutions, Inc, 2198 Sixth Street, Suite 201, Berkeley, CA 94710, (Sent via electronic mail to: hpietropaoli@stellar-environmental.com)
Richard Makdisi, Stellar Environmental Solutions, Inc, 2198 Sixth Street, Suite 201, Berkeley, CA 94710, (Sent via electronic mail to: rmakdisi@stellar-environmental.com)

Dilan Roe, ACDEH, (Sent via electronic mail to: dilan.roe@acgov.org)
Mark Detterman, ACDEH, (Sent via electronic mail to: mark.detterman@acgov.org)
Electronic File, GeoTracker

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.