

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

COLLEEN CHAWLA, 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

October 31, 2018

City of Alameda
Mr. Flavio Barrantes
950 W. Mall Square
Alameda, CA 94501
Sent via e-mail to: fbarrant@alamedaca.gov

Kadeeja Sari
7 Souza Court
Alameda, CA 94502-8005
Sent via e-mail to: kadoo777@aol.com

Subject: Conditional Work Plan Approval for Fuel Leak Case No. RO0003144 and GeoTracker Global ID T10000006142, Alameda Mound Street UST, 1380 Mound Street, Alameda, CA 94501

Dear Mr. Barrantes and Ms. Sari:

Thank you for meeting Alameda County Department of Environmental Health (ACDEH) staff at the site last Friday October 26, 2018. The purpose of the meeting was to address Ms. Sari's, the homeowner's, concerns regarding the underground storage tank (UST) investigation work and site access agreement in her front yard. The UST was located beneath a public sidewalk and served the former Lincoln School, formerly a part of the Alameda Unified School District's (AUSD) elementary school system. Lincoln School operated from 1917 to 1977, when it was demolished and new homes were built in the 1980's. In 2013 the homeowner of 1380 Mound Street, Alameda, observed seepage of an oily product along and through cracks in the public sidewalk. The UST contained Bunker C oil and was observed to be in good condition. On August 26, 2014, Alameda County Department of Environmental Health (ACDEH) oversaw the closure-in-place of the 2,500 gallon former UST in the sidewalk in front of the home at 1380 Mound Street, documented in the *Underground Storage Tank (UST) Closure Report*, dated September 30, 2014. The release was referred to the ACDEH Local Oversight Program (LOP), the lead agency for oversight of investigation and cleanup of petroleum hydrocarbon releases in Alameda County. ACDEH-LOP subsequently listed the subject case on our data base of fuel leak sites.

The *Soil and Groundwater Investigation Work Plan* (Work Plan) dated June 10, 2015, prepared and submitted by ENV America, Inc., (now known as Shoreline Environmental Resources), on behalf of the City of Alameda, was approved for implementation by ACDEH on October 10, 2015. However, implementation of the work plan has been delayed due to property access agreement issues. This Directive Letter was prepared to update the previous Directive Letter dated October 10, 2015 and to communicate required data collection described in the State Water Resources Control Board's (SWRCB) Low Threat Closure Policy (LTCP).

ACDEH evaluated the data presented in the UST Closure Report to the LTCP and we have determined the site does not meet the LTCP General Criteria e (Site Conceptual Model), and the Media-Specific Criteria for Groundwater, the Media-Specific Criteria for Vapor Intrusion to Indoor Air, and the Media-Specific Criteria for Direct Contact and Outdoor Air Exposure. The Work Plan proposed a series of actions which should address the three Media-Specific Criteria, however, preparation of a Site Conceptual Model was not included with the Work Plan, so it has been added as a Technical Comment below. ACDEH conditionally re-approves implementation of the Work Plan provided that all of the technical comments below are addressed and/or 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: karel.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS:

1. **Soil Sample Collection:** Please collect soil samples for analysis from each of the five borings between the depths of zero to five feet below ground surface (bgs) and five to ten feet bgs, at the groundwater interface, lithologic changes, and at areas of obvious impact.
2. **Soil Sample Analytical:** As required by the LTCP, because the UST was documented to contain Bunker C oil, in addition to the soil analysis proposed in the Work Plan: Total Hydrocarbons as gasoline (TPHg), TPH as diesel (TPHd), TPH as motor oil (TPHmo), benzene, toluene, ethylbenzene, and xylenes (BTEX), full suite EPA 8260 including naphthalene, please include analysis for poly-aromatic hydrocarbons (PAHs) EPA Method 8270 including naphthalene with the Selected Ion Monitoring (SIM) mode for all soil samples collected between the depth interval of 0 to five feet bgs to ensure that the detection levels of PAHs are below the concentrations specified in the LTCP for the Media-Specific Direct Contact and Outdoor Air Exposure.
3. **Waste Removal:** All investigation-derived waste must be removed from the site and properly disposed of at an appropriate designated facility in accordance with applicable State laws. Please include the signed waste disposal documentation with the report requested below.
4. **LTCP General Criteria e (Site Conceptual Model) –** According to the LTCP, the SCM is a fundamental element of a comprehensive site investigation. The SCM establishes the source and attributes of the unauthorized release, describes all affected media (including soil, groundwater, and soil vapor as appropriate), describes local geology, hydrogeology and other physical site characteristics that affect contaminant environmental transport and fate, and identifies all confirmed and potential contaminant receptors (including water supply wells, surface water bodies, structures and their inhabitants). The SCM is relied upon by practitioners as a guide for investigative design and data collection. All relevant site characteristics identified by the SCM shall be assessed and supported by data so that the nature, extent and mobility of the release have been established to determine conformance with applicable criteria in this policy.

Our review of the case files indicates that insufficient data collection and analysis has been presented to assess the nature, extent, and mobility of the release and to support compliance with General Criteria e. ACDEH requests preparation of an SCM to be presented in a tabular format that highlights the major SCM elements and associated data gaps, which need to be addressed to progress the site to case closure under the LTCP. ACDEH has developed an SCM in an EXCEL spread sheet format, which will be sent by e-mail separately.

- a. **Sensitive Receptor Survey:** As part of the Work Plan implementation, please complete a Sensitive Receptor Study to determine if sensitive receptors are present within a radius of 1,500 feet of the site. ACDEH requests review of both Alameda County Public Works Agency (ACPWA) and Department of Water Resources (DWR) well data base for a complete inventory of vicinity water supply wells. The ACPWA and DWR data bases provide dissimilar results which necessitate review of both data bases. ACDEH requests the identification and location on a site vicinity figure of all irrigation, water supply, domestic, industrial, and dewatering wells within a 1,500-foot radius of the site. Please be aware that well locations are not confidential, however well construction details are and must not be included with the requested report.

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- b. Sensitive Receptor Identification:** Please identify on one figure the beneficial resources and other sensitive receptors including, but not limited to, surface water bodies, natural resources, schools, hospitals, day care centers, elder care facilities, etc.
- c. Underground Utility Survey:** Please include the results of an on-and off-site underground utility survey including depths to the underground utilities.

Please plot the results of the well survey, sensitive receptor identification, and underground utility survey on an aerial photography-based figure and provide a table listing the numbered location similar to the example provided in Attachment A, *Sample Well Survey Figure and Table*.

TECHNICAL REPORT REQUEST

Please upload technical reports to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention. Please also e-mail a copy of the report to me at karel.detterman@acgov.org:

- **January 11, 2019**– Soil and Groundwater Investigation Report
File to be named: RO3144_SWI_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.

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

Sincerely,

Karel Detterman, PG 5628
Senior Hazardous Materials Specialist

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

Attachment A: *Sample Well Survey Figure and Table*

cc: David Solis, Shoreline Environmental Resources, 1818 Camino Verde, Suite C, Walnut Creek, CA 94597 (Sent via E-mail to: dsolis@shoreline-env.com)
Mr. Robbie Lyng, Alameda Unified School District, 2060 Challenger Drive, Alameda, CA 94501
Sent via e-mail to: rlyng@alameda.k12.ca.us)
Dilan Roe, ACDEH (Sent via E-mail to: dilan.roe@acgov.org)
Karel Detterman, ACDEH (Sent via E-mail to: karel.detterman@acgov.org)
Paresh Khatri, ACDEH (Sent via E-mail to: paresh.khatri@acgov.org)
GeoTracker, eFile

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/

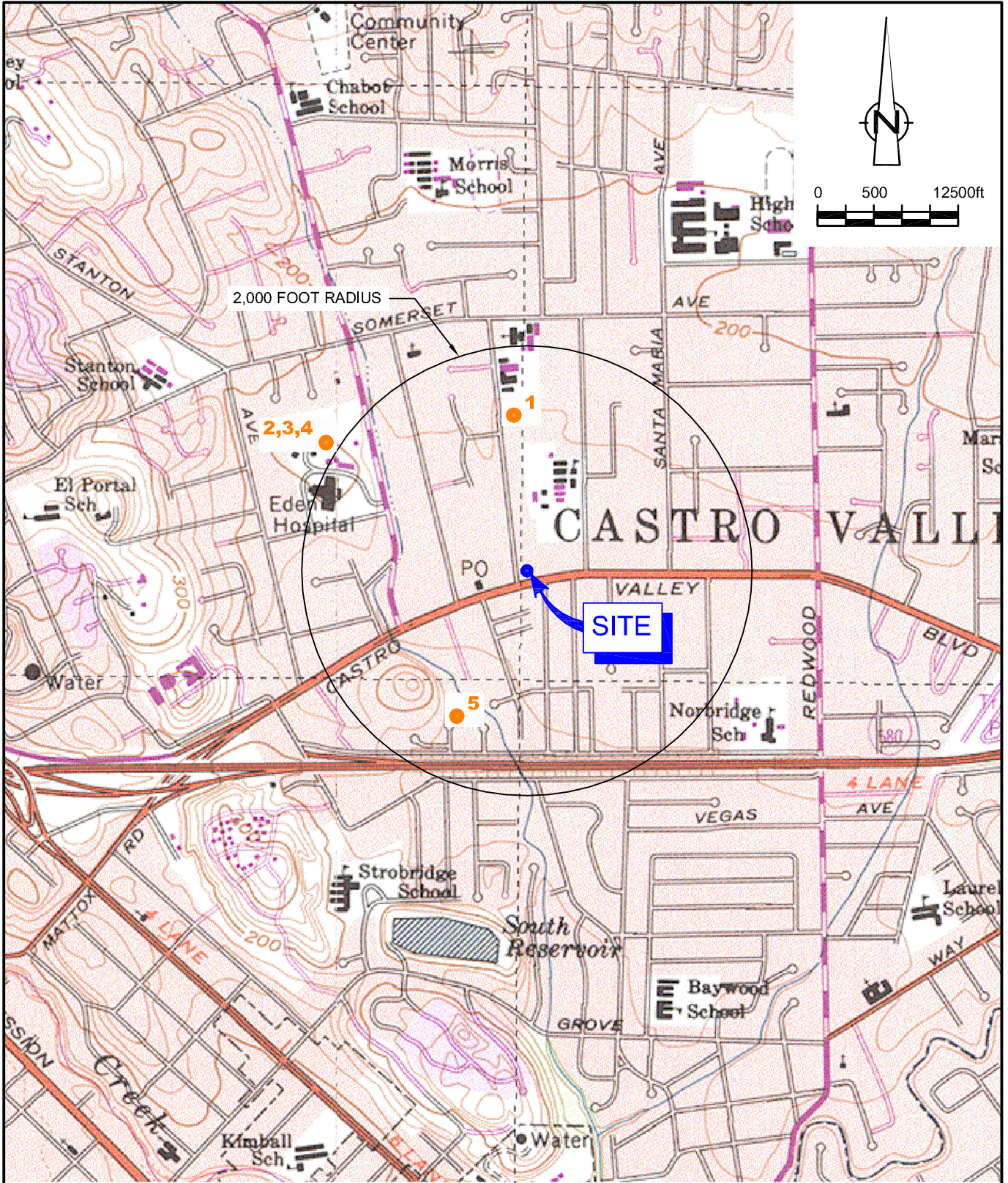
AGENCY OVERSIGHT

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.

ATTACHMENT A

**WELL SURVEY RESULTS
 CHEVRON STATION 9-6991
 2920 CASTRO VALLEY BOULEVARD
 CASTRO VALLEY, CALIFORNIA**

<i>Well No./ Figure ID</i>	<i>Well Owner</i>	<i>Well Address Street</i>	<i>City</i>	<i>Total Well Depth (ft)</i>	<i>Date Installed</i>	<i>Distance/Direction from Site (ft) (approx)</i>	<i>Well Use</i>
1	Private	20036 Anita Avenue Lake Chabot Road	Castro Valley	51	2/19/1953	1,400 N	Domestic
2	Eden Township Hospital	1,000' south of Williams	Castro Valley	150	9/30/1953	2,000 NW	Test well
3	Eden Township Hospital	Eden Township Hospital	Castro Valley	250	9/9/1952	2,000 NW	Domestic
4	Eden Township Hospital	Eden Township Hospital	Castro Valley	60	7/11/1952	2,000 NW	Cooling system return
5	Sam Wallace	Tyee Court	Castro Valley	52	7/3/1953	1,400 S-SW	Domestic



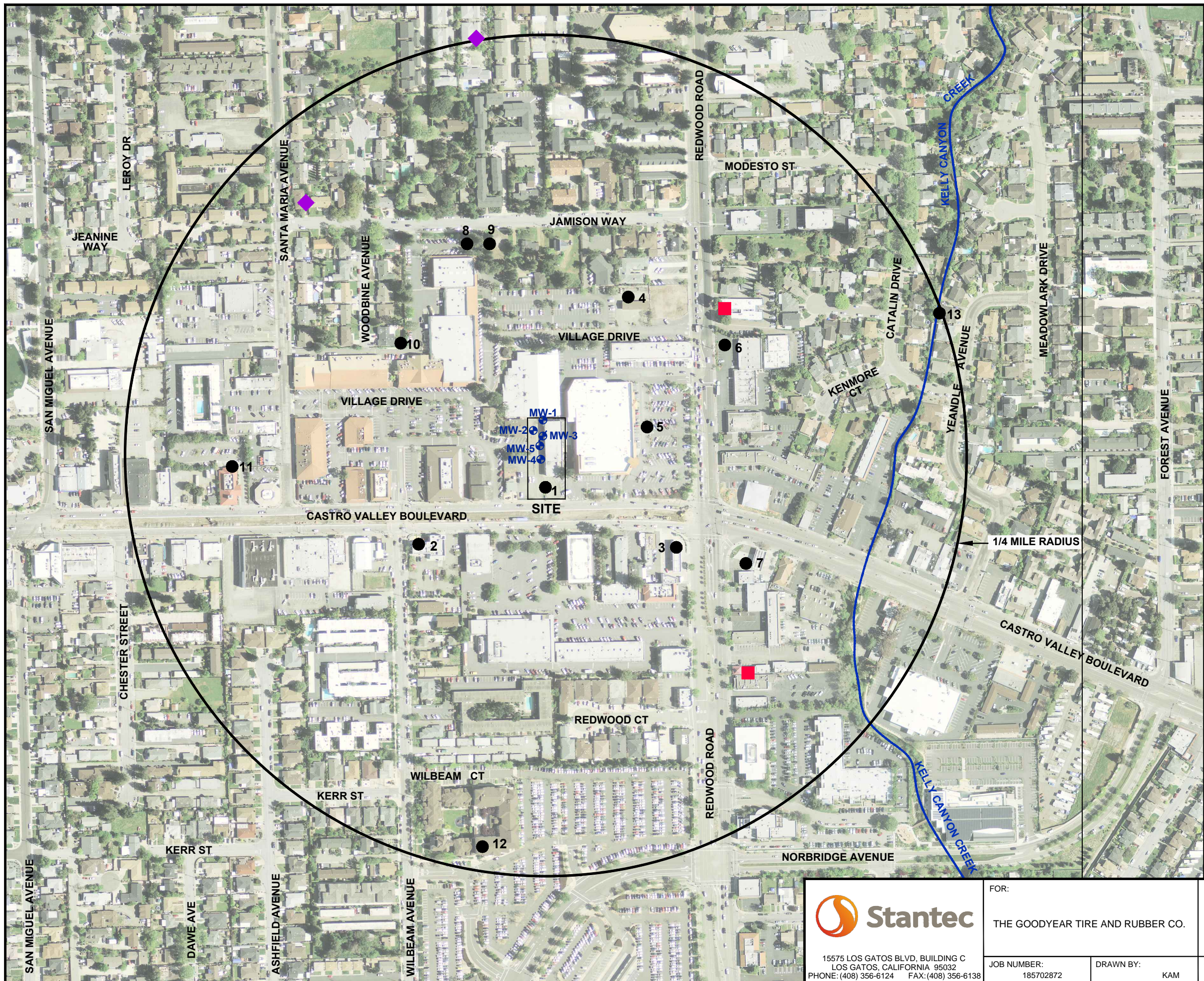
SOURCE: TOPO! MAPS.

LEGEND

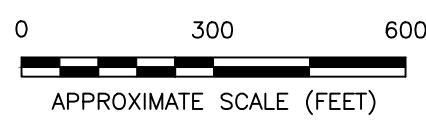
- APPROXIMATE WELL LOCATION



WELL SURVEY MAP
CHEVRON SERVICE STATION 9-6991
2920 CASTRO VALLEY BOULEVARD
Castro Valley, California



- LEGEND:**
- PROPERTIES WITH WELLS WITHIN 1/4-MILE OF SITE
 - MEDICAL OFFICES WITHIN 1/4-MILE OF SITE
 - ◆ SCHOOLS WITHIN 1/4-MILE OF SITE
 - ⊕ ACTIVE GROUNDWATER MONITORING WELL LOCATION
 - ⊕ DESTROYED GROUNDWATER MONITORING WELL LOCATION



Stantec
 15575 LOS GATOS BLVD, BUILDING C
 LOS GATOS, CALIFORNIA 95032
 PHONE: (408) 356-6124 FAX: (408) 356-6138

FOR: THE GOODYEAR TIRE AND RUBBER CO.	
JOB NUMBER: 185702872	DRAWN BY: KAM

WELL & SENSITIVE RECEPTOR SURVEY	
GOODYEAR DEX #9578	
3430 CASTRO VALLEY BOULEVARD	
CASTRO VALLEY, CALIFORNIA	
CHECKED BY: KM	APPROVED BY: GM

FIGURE: 6
DATE: 01/08/15