



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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January 14, 2015

Mr. George Smith
Housing Authority of County of Alameda
1489 Salmon Way
Hayward, CA 94544
(sent via electronic mail to georges@haca.net)

Subject: Modified Approval of Work Plan; Fuel Leak Case No. RO0003152 and GeoTracker Global ID T10000006327, Housing Authority of County of Alameda, 22941 Atherton Street, Hayward, CA 94541

Dear Mr. Smith:

Alameda County Environmental Health (ACEH) has reviewed the case file, including the *Data Gap Investigation Work Plan and Focused Conceptual Site Model*, dated December 10, 2014, and the email correspondence sent on January 14, 2015, as a work plan addendum. The work plan and addendum was prepared and submitted on your behalf by SCA Environmental, Inc (SCA). The work plan proposed the installation of six soil bores and the collection of grab groundwater samples from temporary wells in each soil bore, and the work plan addendum provided Standard Operating Procedures that will be used and a revised Figure 2 to document a telephone conversation discussing the relocation of soil bore B-3.

Based on ACEH staff review of the work plan, the proposed 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 – The referenced work plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests several modifications to the approach. Please submit a report by the date specified below.

- a. Location of Soil Bore B-3** – As noted ACEH is in general agreement with the proposed scope of work; however, as documented and modified in the work plan addendum, verbally requested the relocation of soil bore B-3 approximately 55 – 60 feet north of the initial proposed location, along the western property edge. This was requested in order to limit the extent of a potential groundwater plume to the south of the source locations.
- b. Soil Sample Selection Protocols** – The work plan proposes to collect and retain for laboratory analysis one soil sample within the upper 10 feet below grade surface (bgs) in soil bores B-5 and B-6. The work plan additionally proposed to collect and submit for laboratory analysis one soil sample within the vadose zone in soil bore B-1. Finally, the work plan proposed to collect one soil sample from the capillary fringe in soil bores B-2 through B-4.

To characterize the potential for vapor intrusion and for direct contact concerns in the source area, the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) requires the analysis of multiple soil samples in the 0 to 5 and the 5 to 10 foot depth intervals. Consequently ACEH requests that soil samples from both intervals be submitted for laboratory analysis in bores B-5 and B-6.

ACEH additionally requests the collection and analysis of soil samples from soil bores B-1 through B-6 at significant changes in lithology, and at indications of contamination such as photoionization detections, discoloration, and other indications. The collection of capillary fringe soil samples in bores B-2 to B-4 is appropriate. Please also be aware that the LTCP requires the delineation of the vertical extent of soil contamination.

- c. Soil Analytical Suite** – The work plan proposes analysis for Total Petroleum Hydrocarbons (TPH) as gasoline (TPHg), TPH as diesel (TPHd), and TPH as motor oil (TPHmo) by EPA Method 8015M, as well as benzene, toluene, ethylbenzene, total xylenes by EPA Method 8021, and naphthalene and poly-aromatic hydrocarbons (PAHs) by EPA Method 8270. Please additionally include analysis for methyl-tert butyl ether (MTBE), normally included at no additional cost.

The work plan proposes the submittal one soil sample in the upper 10 feet bgs for analysis of naphthalene and PAHs from soil bores B-5 and B-6. Because the LTCP evaluation requires the analysis of naphthalene and PAHs in the 0 to 5 foot depth interval (within the residual source area), ACEH requests the submittal of soil samples from both soil bores in the 5 foot depth interval. Additionally, review of existing PAH analytical data at the site indicates that the reporting limits for PAHs are greater than appropriate LTCP comparison values thus rendering an LTCP evaluation incomplete. Consequently, ACEH additionally requests the collection and submittal of soil samples for naphthalene and PAH analysis from bores B-5 and B-6 in the 5 to 10 foot intervals.

- d. Grab Groundwater Analytical Suite** - Please additionally include analysis for MTBE at no additional cost.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH 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:

- **March 27, 2015** – Site Investigation
File to be named: RO3152_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.

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: Glenn Young, SCA Environmental, Inc, 334 19th Street, Oakland, CA 94612, (sent via electronic mail to: gyoung@sca-enviro.com)
Hugh Murphy, City of Hayward Fire Department, Hazardous Materials Division, 777 B Street, Hayward, CA 94541, (sent via electronic mail to: hughmurphy@hayward-ca.gov)
Dilan Roe, ACEH, (sent via electronic mail to: dilan.roe@acgov.org)
Mark Detterman, ACEH, (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.