

Jurek, Anne, Env. Health

From: Jurek, Anne, Env. Health
Sent: Tuesday, August 02, 2016 1:39 PM
To: 'don.ashton@us.bureauveritas.com'; 'kevin.anderson@walgreens.com';
'christopher.whitehurst@walgreens.com'; 'ragdale.william@cleanharbors.com';
'edward.lee@walgreens.com'; 'brent.hoberg@walgreens.com'
Cc: Roe, Dilan, Env. Health
Subject: Response to Work Plan for Site Cleanup Program Case No. RO0003158, Walgreens
Sunol, 9494 Koopman Road, Sunol, CA 94586
Attachments: FTP and GeoTracker requirements.pdf

Dear Gentlemen:

Alameda County Department of Environmental Health (ACDEH) is following up after our meeting on July 28, 2016, during which we discussed the above the referenced case, including the work plan entitled "Work Plan for Walgreens Spill Site Investigation Work Plan," dated January 22, 2016 (Work Plan), which was prepared by Bureau Veritas North America, Inc. (BVNA). As discussed in the meeting, we are requesting a revised Work Plan.

Summarized below are ACDEH's technical comments and recommendations for the revised work plan, based on our review of the case file and our discussion during the meeting:

- A complete discussion of the time line of the accident, all remediation, investigation, and oversight that occurred after the spill. Include a discussion about agencies contacted, including contact names for Alameda County Water District (ACWD) and East Bay Regional Park District (EBRPD) and direction received from those agencies.
- A discussion about the water levels in the creek at the time of the spill and in subsequent days when removal activities were being conducted.
- A discussion of the volume of diesel spilled and the volume of soil and debris excavated/removed from soil and the channel. Please delineate how much material was excavated/removed in each location on a map.
- Resolve discrepancies between the report entitled "Walgreens Diesel Spill Emergency Response and Cleanup Summary" dated January 2015 and prepared by Clean Harbors Environmental Services, and the Work Plan in the discussion of the soil samples collected from the drainage ditch on December 1, 2016 where the soil excavation occurred and the sampling procedure used.
- Based on our discussion during the meeting with CUPA staff, the initial soil and groundwater samples collected on December 1, 2016 during the course of the emergency response and remediation were not done under County regulatory oversight. Available on ACDEH's ftp and the State Water Resources Control Board's (State Water Board) GeoTracker website is ACDEH CUPA site inspection notes, dated November 26, 2014, which include photos taken at the site and dates of inspection. Therefore, ACDEH requests that two soil borings be advanced, one at the location of the crash and spill and the other immediately adjacent to Alameda Creek in the unlined drainage, based on Figure 2 in the Work Plan. We request that each sample be collected at 6 inches and 24 inches below ground surface (bgs) and tested for TPH-d using silica gel clean up.
- At this time, we are not requesting that another sample be collected from the well at the site that is owned by San Francisco Public Utilities Commission (SFPUC). We request that you contact SFPUC regarding the existence of analytical data for groundwater collected at the well before and after the occurrence of the spill at the site before proceeding further with groundwater sampling. Additionally, please verify the type of well (potable, irrigation, etc.) and the well construction details (seal, screen interval, etc.)

- Please upload all documents related to this case to both the Alameda County ftp site and the State Water Board's GeoTracker website including reports, borehole logs, site map, and analytical data (EDF format), and photos pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3890 to 3895. Details of the submission requirements are discussed in the attachments.

Technical Report Request:

Please upload technical reports to the ACDEH ftp site (Attention: Anne Jurek), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- September 9, 2016 – Revised Work Plan
- File to be named: WP_ADD_R_YYYY-MM-DD RO3158

If you have any concerns or questions, please contact me. Thank you.

Anne Jurek, M.S.

Professional Technical Specialist II (Geology)

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