

ALAMEDA COUNTY  
**HEALTH CARE SERVICES  
AGENCY**

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH  
LOCAL OVERSIGHT PROGRAM (LOP) FOR  
HAZARDOUS MATERIALS RELEASES  
1131 HARBOR BAY PARKWAY  
ALAMEDA, CA 94502  
(510) 567-6700  
FAX (510) 337-9335

May 1, 2017

Pacific Gas & Electric Company  
3401 Crow Canyon Road  
San Ramon, CA 94583  
Attn.: Anne Conner (*Sent via electronic mail to [apb1@pge.com](mailto:apb1@pge.com)*)

Subject: Work Plan Review; Site Cleanup Program Case No. RO0003196 and GeoTracker Global ID T10000008040, CNG Station, 205 Brush Street, Oakland, CA 94607

Dear Ms. Conner:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file and the recently submitted document entitled *Additional Investigation, In Situ Chemical Oxidation Pilot Study and Bench-Scale Testing Work Plan* (Work Plan) dated February 28, 2017 and prepared by Environmental Resources Management-West, Inc. (ERM) for the subject site. As presented in the Work Plan, ERM proposes to:

1. Address the four data gaps identified in previous phases of the investigation work, specified as:
  - A. The extent of lead in the shallow soil, to be addressed with the advancement of four shallow soil borings;
  - B. Collection of "consistent" soil vapor data results with the installation of five permanent soil vapor probes;
  - C. Conduct an onsite utility corridor study to identify potential preferred pathways for vapor migration; and
  - D. Collection of repeatable groundwater data within the impacted shallow groundwater interval, which will be addressed by the installation of five shallow groundwater monitoring wells.
2. Conduct an in situ chemical oxidation (ISCO) pilot study to begin total petroleum hydrocarbon (TPH) and associated volatile organic compound (VOC) mass removal by means of 37 reagent injection points; and
3. Conduct a bench-scale test to evaluate the treatability options for dissolved metals by means of testing three reagent formulations at dosages.

In our letter dated April 24, 2017, ACDEH staff conditionally approved Item 1 and expressed the opinion that it was premature to proceed with Item 2 and Item 3. Upon further review and discussion, ACDEH has reevaluated its objections to Item 2 and Item 3, and based on our review of the referenced document and of the case file, we generally concur with the implementation of the proposed scope of work addressed in Item 2 and Item 3 above. We request that you perform the proposed work, and send us the technical reports requested below. Please provide 72-hour advance written notification to this office (electronic mail preferred to: [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org)) prior to the start of field activities.

**TECHNICAL REPORT REQUEST**

Please submit reports to ACDEH (Attention: Keith Nowell), and upload technical reports to the ACDEH FTP site (Attention: Keith Nowell) and to the California State Water Resources Control Board's

(SWRCB) Geotracker website, in accordance with the following specified file naming convention and schedule:

- **July 5, 2017 – Groundwater Monitoring Well Installation Report** (file to be named: RO0003196\_SWI\_R\_yyyy-mm-dd)
- **July 5, 2017 – Soil Vapor Investigation Report** (file to be named: RO0003196\_SWI\_R\_yyyy-mm-dd)
- **July 31, 2017 –Report on ISCO Pilot Test Implementation** (file to be named: RO0003196\_REMI\_R\_yyyy-mm-dd)

Thank you for your cooperation. ACDEH looks forward to working with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org).

Sincerely,

Keith Nowell, PG, CHG  
Hazardous Materials Specialist

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

cc: Ben LePage, Pacific Gas & Electric Company, 3401 Crow Canyon Road, San Ramon, CA 94583  
(sent via electronic mail to [Ben.LePage@pge.com](mailto:Ben.LePage@pge.com))

John Lucio, Project Manager, Environmental Resources Management, 1277 Treat Boulevard, Suite 500, Walnut Creek, CA (sent via electronic mail to [john.lucio@erm.com](mailto:john.lucio@erm.com))

Arun Chemburkar, Project Manager, Environmental Resources Management, 1277 Treat Boulevard, Suite 500, Walnut Creek, CA (sent via electronic mail to [arun.chemburkar@erm.com](mailto:arun.chemburkar@erm.com))

Dilan Roe, (sent via electronic mail to [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))

Paresh Khatri (sent via electronic mail to [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org))

Keith Nowell, (sent via electronic mail to [keith.nowell@acgov.org](mailto:keith.nowell@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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) 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 File Transfer Protocol (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 SCP 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 ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)) for more information on these requirements.

#### 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 ACDEH's FTP server and the SWRCB's GeoTracker website." 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 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. 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 case meet this requirement. 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

Please note that delays in investigation, late 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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> December 1, 2016
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions


The Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) 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 acknowledgement 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](mailto: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) Open File Explorer using the Windows  key + E keyboard shortcut.
    - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
  - b) On the address bar, type in ftp://alcoftp1.acgov.org.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
  - d) Click Log On.
  - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - f) 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](mailto: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.