



November 28, 2017

Ms. Marcia Redford
170 Woodland Way
Piedmont, CA 94611

(Sent via electronic mail to: Redfordfamily@earthlink.net)

Subject: Conditional Work Plan Approval; Fuel Leak Case No. RO0003256 and GeoTracker Global ID T10000010538, Woodford Residence, 170 Woodland Way, Piedmont, CA 94611

Dear Ms. Woodford:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file, including the September 20, 2017, *Data Gap Work Plan* prepared and submitted on your behalf by the Wheeler Group Environmental LLC (Wheeler). The work plan proposed the installation of nine soil bores to determine the lateral extent of soil and groundwater contamination, the extent of potential Light Non-Aqueous Phased Liquids (LNAPL), and the installation of one sub-slab vapor pin along the former product piping located beneath the basement floor.

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 Modification** – The referenced work plan proposes a series of actions with which ACDEH is in general agreement of undertaking; however, ACDEH requests several modifications to the proposed scope of work. Please submit a report by the date specified below.
 - a. **Soil Sample Selection Protocols** – The work plan proposes to collect and retain for laboratory analysis soil samples at pre-defined set depths (5, 10, 15 feet, and as stated, at other intervals as needed based on field observations). As discussed in the report, please ensure that the soil samples are not collected at set depths, but are collected at signs of contamination such as photoionization detections, discoloration, etc., and at major lithologic changes. Because the Low Threat Closure Policy (LTCP) requires soil samples in the 0 to 5 and the 5 to 10 foot intervals, ACDEH requests that soil samples collected for each of the additional reasons, be submitted for laboratory analysis.
 - b. **Drilling Methodology** – The referenced work plan proposed the use of a hydraulic push drilling methodology. Due to the high potential to hit refusal with near surface bedrock, ACDEH requests the use of a drilling rig with dual hydraulic push and Hollow-Stem Auger (HAS) drilling capability, which may have better success in achieving the stated goals in one site mobilization.
 - c. **Utility Preferential Pathway Locations and Depths** – Thank you for locating the sanitary sewer at the subject site. Its location suggests that it may be a preferential pathway for the migration of LNAPL or dissolved phase liquids at the site. In the report requested below, please additionally locate all underground utility locations, including depths, at the site in order to determine if other underground utilities may represent a preferential migration pathway at the house. In addition to

electrical, water, and other potential underground utilities, please also include any French drains and associated sumps that may discharge to the street, and represent non-point source discharges.

- d. **Additional Sub-Slab Vapor Point** – ACDEH is in agreement with the location of sub-slab vapor pin SS1 along the product piping. ACDEH also has experience that indicates that potential former source areas such as the former boiler location may also represent a substantial vapor intrusion risk to the basement and house. Therefore, ACDEH requests the addition of an additional sub-slab vapor pin at the location of the former boiler.
 - e. **Vapor Shroud Set-Up** – The vapor shroud set-up proposed in Figure 7 of the work plan differs substantially from vapor shroud set-ups that are acceptable within Department of Toxic Substance Control (DTSC) guidance. Because ACDEH adheres to DTSC guidance, ACDEH requires all connections, including the connections to the Summa canisters, be contained inside a shroud. Please see Figure C-1 of the DTSC *Advisory Active Soil Gas Investigation*, dated July 2015 for an illustration of this set-up. The intent is to enclose all potential points of leakage inside the shroud to determine if any leakage has occurred along the entire sampling train. This will require a substantially larger shroud than discussed in the work plan. Flexible access ports to the interior of the shroud can be constructed along the bottom of the shroud to open and close valves. Please document the changes to the shroud set-up in the report requested below.
 - f. **Shroud Tracer Gas** – Due to the required change in shroud set-up it appears appropriate to change the tracer gas used in the vapor sampling effort to helium which will easily volatilize and fill the shroud.
 - g. **Shroud Tracer Gas Concentration** – In order to determine the rate of atmospheric leakage, if any, into the sampling train, please collect a sample of the shroud vapor atmosphere and analyze it for helium. DTSC guidance allows up to a 5% leak rate.
 - h. **Analytical Suite** – For all media, in addition to the proposed analytical suite, please include methyl tert butyl ether (MTBE), as required by the LTCP.
 - i. **Naphthalene Analysis by TO-17** – Provided tubing utilized in the vapor sampling is validated to be Teflon tubing, rather than Nylaflow tubing, naphthalene confirmation sampling by TO-17 (in addition to TO-15) can be kept to a minimum of one location. Please refer to Appendix E of the DTSC guidance for further details.
2. **Claim Site On Geotracker** - As described in the Attachment 1, Responsible Party(ies) Legal Requirements/Obligations, all technical reports must be submitted to both the ACDEH ftp website and the State Water Resource Control Board (SWRCB) GeoTracker website. To upload to the Geotracker website you will need to claim your site on GeoTracker and then upload the Work Plan and all future reports to the GeoTracker website. Pursuant to CCR Sections 2729 and 2729.1, all analytical data submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, should groundwater wells be required, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports (LUFT or SLIC) is required in GeoTracker (in PDF format). Please upload all reports prepared after July 1, 2005 to the SWRCB's Geotracker database website in accordance with the above-cited regulation. At the same time, please upload the reports to the ACDEH ftp website.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

Please note that ACDEH has updated Attachment 1 with regard to report submittals to ACDEH. ACDEH will now be requiring a Submittal Acknowledgement Statement, replacing the Perjury Statement, as a cover letter signed by the Responsible Party (RP). The language for the Submittal Acknowledgement Statement is as follows:

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.

Please make this change to your submittals to ACDEH.

TECHNICAL REPORT REQUEST

Please submit the following deliverable to ACDEH (Attention: Mark Detterman), according to the following schedule:

- **February 9, 2018** – Soil and Groundwater Investigation Report
File to be named: RO3256_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
Electronic Report Upload (ftp) Instructions

cc: Brent Wheeler, Wheeler Group Environmental LLC, 3690B Third Street, Suite 221, San Rafael, CA 94901, (Sent via electronic mail to: bwheeler@wheelergroupenvironmental.com)

Mark Youngkin, Wheeler Group Environmental LLC, 3690B Third Street, Suite 221, San Rafael, CA 94901, (Sent via electronic mail to: mark.youngkin@gmail.com)

Dilan Roe, ACDEH, (Sent via electronic mail to: dilan.roe@acgov.org)

Paresh Khatri, ACDEH; (Sent via electronic mail to: paresh.khatri@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

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/) 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.

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