

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, SUITE 250
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

February 10, 2017

Chevron Environmental Management Company
6101 Bollinger Canyon Road, C2102
San Ramon, CA 94583
Attention: James Kiernan
(Sent via electronic mail to: jkiernan@chevron.com)

United Brothers Enterprise Inc.
2501 North Main Street
Walnut Creek, CA 94597
Attention: DeLong Liu
(Sent via electronic mail to: delonglisi@yahoo.com)

Subject: Conditional Work Plan Approval, Fuel Leak Case No. RO0000253 and GeoTracker Global ID T0600101467, Unocal #5781, 3535 Pierson Street, Oakland, CA 94619

Dear Messrs. Kiernan and Liu:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file, including the recently submitted document entitled *Offsite Investigation Work Plan (Work Plan)*, dated January 24, 2017, prepared by Arcadis U.S., Inc. (Arcadis) for the subject site. As presented in the Work Plan, Arcadis proposes to advance two (2) soil bores for the collection of grab groundwater (GGW) samples. The offsite locations of the soil bores are to further define the contaminant plume in the direction of the Julia Morgan School for Girls, situated to the east across MacArthur Boulevard. The locations of the proposed soil bores are presented on Figure 3 of the Work Plan.

In the Work Plan, Arcadis states the GGW samples will be analyzed for total petroleum hydrocarbons (TPH) as gasoline (TPHg), TPH as diesel (TPHd); benzene, toluene, ethylbenzene, and xylenes (collectively BTEX); the fuel oxygenates methyl tertiary butyl ether (MTBE), tertiary butyl alcohol (TBA), di-isopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), and ethanol; and 1,2-dichloroethane (1,2-DCA) and ethylene dibromide (EDB).

Arcadis further states that soil samples will only be collected for analytical testing if there are obvious signs of contamination based on visual and olfactory observations, as well as photoionization detector (PID) readings of volatile organic compounds (VOCs) associated with soil screening.

Based on ACDEH staff review of the referenced document and of the case file, we generally concur with the recently proposed scope of work, provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. While the comments below request a number of additional soil bores and additionally requested items, submittal of a revised Work Plan is limited to a revised Figure 3 unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed. We request that you address the following technical comments, submit the requested document, and upon ACDEH approval, 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) prior to the start of field activities.

TECHNICAL COMMENTS

- 1. Electronic Submittal of Information** – The Work Plan references the most recent groundwater monitoring event as having been conducted in October 2016. As of this writing, ACDEH is not in receipt

of this report. ACDEH requests submittal, by the date specified below, of this and any other documents pertaining to site investigation, monitoring, or cleanup not currently on the ACDEH FTP site. Additionally, ACDEH requests a list of these document submittals to the FTP site be provided to ACDEH via electronic mail, Attention: Keith Nowell, by the date specified below.

- 2. Request for additional bore locations** – The placement of the proposed soil bores, identified as SB-16 and SB-17 in the Work Plan, are approximately 90 feet apart. ACDEH is of the opinion this distance between the two bores may be sufficiently great, allowing the contaminant plume to pass between these locations. Therefore, ACDEH requests placement of an additional soil bore approximately equidistant between SB-16 and SB-17. Please indicate the location of this soil bore on the Work Plan Addendum (revised Figure 3) requested below.

Figure 3 of the Work Plan includes a rose diagram indicating significant variability of groundwater flow. Based on this variability, ACDEH requests an additional soil bore be advanced across MacArthur Boulevard from the subject site, in a southerly direction from the bore SB-16 location. This additional soil bore may increase the likelihood of capturing the contaminant plume should the plume have advanced to the east-southeast toward the school. Please indicate the location of this soil bore on the Work Plan Addendum (revised Figure 3) requested below.

- 3. Soil sampling** – As indicated above, Arcadis proposes soil sampling for analytical testing only if there are obvious signs of contamination based on visual, olfactory and PID readings. ACDEH recommends collection and analysis of soil samples at the soil/water interface from each of the soil bores. Additionally, ACDEH requests collection and analysis of soil samples at areas of obvious contamination, and if staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number of soil samples from this interval should be submitted for laboratory analyses to characterize the fuel hydrocarbon concentrations within this interval to ensure that the analytical results define the vertical extent of TPH impacts at these locations.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

Please note that ACDEH has updated its 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.

NOTIFICATION OF FIELDWORK ACTIVITIES

Please schedule and complete the fieldwork activities by the date specified below and provide ACDEH with at least three (3) business days notification prior to conducting the fieldwork.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH FTP site (Attention: Keith Nowell), and to the State Water Resources Control Board's (SWRCBs) Geotracker website, in accordance with the following specified file naming convention and schedule:

- **February 28, 2017** – Electronic Submittal of Information
- **February 28, 2017** – List of documents submitted to ACDEH (Provided via electronic mail to ACDEH Attn.: Keith Nowell)
- **March 10, 2017** – **Work Plan Addendum (Figure 3)** (Provided to ACDEH, Attn.: Keith Nowell as an electronic mail attachment)
- **90 Days After Work Plan Addendum Approval** – Soil and Groundwater Investigation Report (file to be named: RO0000253_SWI_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

Sincerely,

Keith Nowell, PG, CHG
Hazardous Materials Specialist

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

cc: Tamera Rogers, Arcadis U.S. Inc., 6296 San Ignacio Ave, Suite C & D, San Jose, CA, 95119 (*Sent via electronic mail to: Tamera.Rogers@arcadis.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*)
Keith Nowell, ACDEH, (*Sent via electronic mail to keith.nowell@acgov.org*)
GeoTracker, file

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.

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 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.
 - 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.