

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

COLLEEN CHAWLA, Agency 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

June 28, 2018

Mr. Paul Harper
United Parcel Service
55 Glenlake Parkway, NE
Atlanta, GA 30328-3474

(Sent via electronic mail to: pharper@ups.com)

Ms. Diane Heinze
Port of Oakland
530 Water St.
Oakland, CA 94607

(Sent via electronic mail to: dheinze@portoakland.com)

Subject: Fuel Leak Case No. RO0000315 and Geotracker Global ID T0600100939, United Parcel Service, 8400 Pardee Dr., Oakland, CA 94621

Dear Mr. Harper and Ms. Heinze:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the document entitled *Expanded Work Plan for Free Product Delineation* (Work Plan), dated July 21, 2015, which was prepared by Arcadis U.S., Inc. (Arcadis) for the subject site. The Work Plan addresses ACDEH's comments presented in our correspondence dated July 14, 2015. The Work Plan proposes to delineate the extent of free phase product at the site at five areas known and suspected of containing free phase product. The work would be performed in phases and include the installation of 13 groundwater monitoring wells.

ACDEH conditionally approved the Work Plan in our letter dated July 28, 2015. We understand the final phase of Work Plan implementation will occur in the near future. ACDEH requests completion of Work Plan as conditionally approved. Following completion of activities, please submit a report documenting investigation activities for all phases of work and provide recommendations for presentation at a meeting with our agency staff. Please identify data gaps met and those remaining to address the General and Media Specific criteria of the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) with recommendations to move the case toward closure.

Our review of the case files revealed several reports and/or supporting documents have not been submitted to the SWRCBs GeoTracker website. Prior to our meeting we request you review GeoTracker for completeness and submit the missing documents to bring the case in to compliance with state regulations. Additionally, several document submittals have been denied and do not appear on GeoTracker. Please see the table, provided as Attachment 1, summarizing the document denials and the reason for each denial. Please review the attached table and address the denial issue, if applicable, and resubmit the document(s) by the date specified below.

ACDEH requests notifying our agency of the aforementioned document submittals (and re-submittals) via electronic mail, Attention: Keith Nowell, listing the document uploads.

TECHNICAL REPORT REQUEST

Please upload technical reports to the SWRCBs GeoTracker website, in accordance with the following specified file naming convention and schedule:

- **August 18, 2018** – Electronic Submittal of Information and submittals listing to ACDEH
- **September 27, 2018** – Site Investigation Report (file to be named RO0000315_SWI_R_mm-dd-yyyy) and associated supporting documentation (including GEO_MAPs, GEO_BOREs, GEO_WELL, EDFs, GEO_XY and GEO_Z)
- **October (TBD)** – Meeting

Mr. Harper and Ms. Heinze

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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, P.G., C.HG
Hazardous Materials Specialist

Enclosures: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations
Attachment A – Table Identifying GeoTracker Document Denials

cc: Jennifer Halcomb-LeBeau, Arcadis U.S., Inc., 1000 Cobb Place Blvd., Bldg. 500-A, S Kennesaw, GA 30144 (Sent via electronic mail to: Jennifer.LeBeau@arcadis-us.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

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>				
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
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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 the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

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 and include the professional registration stamp, signature, and statement of professional certification. 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

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.

ATTACHMENT A

Confirmation #	Submittal title	Submittal type	Denial Date	Reason for Denial
9457757115	Year 2008 Second Semi-Annual Groundwater Monitoring and Sampling Report	GEO_WELL	12/22/2008	Free product reported in two wells and sheen detected was reported on the field sheet in one. Also, wells on Geotracker are reported to be over 500 feet away from the site. Please ensure that the survey data is to NAD83.
8056126415	Groundwater Monitoring and Baseline Sampling Report	EDF	7/26/2017	It appears that the associated GEO_REPORT for this analytical data still has not been uploaded. Please confirm, and upload the GWM_REPORT associated with this sampling event from 3/19/2012. This EDF will be accepted once the necessary report is uploaded to geotracker. Thank you.
7666843473	2nd Semi-Annual Groundwater Monitoring and Baseline Sampling Report	GEO_WELL	7/26/2017	It appears that the associated GEO_REPORT for this GEO_WELL file still has not been uploaded. Please confirm, and upload the GWM_REPORT associated with this sampling event from 3/19/2012. This GEO_WELL will be accepted once the necessary report is uploaded to geotracker. Thank you.
8036121428	2nd Semi-Annual Groundwater Monitoring and Baseline Sampling Report	EDF	7/26/2017	This is an EDF, Please rename this as an EDF for the appropriate Half of the year and submit the Groundwater Monitoring Report to Geotracker.
2150453090	July_J51143-1 UDS Level 2 Report Final Report	GEO_REPORT	7/27/2017	It appears that the report for this sampling event has not been uploaded to geotracker yet. Please confirm and submit the GEO_REPORT associated with this analytical data. Thank you.
5741869270	Supplemental Site Investigation Report	GEO_REPORT	7/28/2017	Please upload the boring log and analytical data as stand-alone GEO_BORE and EDF files respectively. This report will be accepted once these files are submitted to Geotracker. Thank you.
7666843473	GEO_WELL	GEO_WELL	7/28/2017	It appears that this GEO_WELL data is a duplicate of GEO_WELL with confirmation # 8098762273. Please confirm and delete if it is a duplicate. Thank you.
6502656936	United Parcel Service Oakland Facility Modifications - Boring Logs	GEO_REPORT	7/28/2017	Please submit these boring logs as GEO_BORE files. Thank you
3868858039	J70520-1 UDS Level 2 Report Final Report	GEO_REPORT	7/28/2017	Please upload analytical data as EDF files instead of GEO_REPORT files. Thank you.
4532137215	UPS-Oakland Hub Tank Closure Assessment Report June 2009 (2 of 4)	GEO_REPORT	8/1/2017	Please upload the analytical data from this report as stand-alone EDF. This report will be accepted once this is submitted to geotracker. Thank you.
3438173592	UPS-Oakland Hub Tank Closure Assessment Report June 2009 (1 of 4)	GEO_REPORT	8/1/2017	Please submit the site maps from this report (minimum fig 2,3 and 4) as stand-alone GEO_MAP files. This report will be accepted once these files are uploaded to geotracker. Thank you.
9613023757	UPS_GEO_WELL	GEO_WELL	6/16/2016	Does not include all depth to free product measurements for the reporting periods.