

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

29 November 2018

Kelle Lynch McMahon
Peralta Community College District
333 East 8th Street
Oakland, CA 94606
(Sent via E-mail to:
klynchmcmahon@peralta.edu)

Subject: Request for Workplan, Fuel Leak Case No. RO0000384 and GeoTracker Global ID T0600100983, Peralta College District, 501 5th Avenue, 333 East 8th Street, and 286 East 10th Street, Oakland, CA 94606

Dear Ms. McMahon:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file for the above-referenced site, including the following documents prepared on your behalf by ACC Environmental Consultants, Inc. (ACC):

- Phase I Environmental Site Assessment Report, dated 17 July 2018 (Phase I ESA)
- Report for Semi-Annual Groundwater Monitoring (First Half 2018), dated 17 July 2018 (SAMR)
- Conceptual Site Model, dated 31 August 2018 (CSM)

In addition, ACDEH met with Peralta Community College District and City of Oakland representatives on 18 July 2018.

The CSM summarizes removal of twelve underground storage tanks (USTs) from the parcel located south of East 8th Street (the south parcel), between 1992 and 1998. The Phase I ESA identifies two service stations and various industrial and automotive-related former operations on the parcels located north of East 8th Street (the north parcels); however, the Phase I ESA states that no information on the status of underground storage tank (UST) systems on the north parcels was available. The Phase I ESA reports that from 1933 until 1967 the Oakland Municipal Yard occupied the south parcel. Operations conducted at the south parcel by the Oakland Municipal Yard or the Peralta Community College District from 1933 through 1974 reportedly included warehouses, a gasoline and oil station, automobile washing, an air and brake warehouse, oil lamp warehouse, and a garage. The SAMR states that no petroleum compounds were detected in samples collected from monitoring wells MW-1 and MW-4 and that wells MW-2 and MW-3 were destroyed during excavations.

Based on our review of the case file, ACDEH generally concurs with (1) the recommendations summarized in the SAMR, (2) the recommendations in the Phase I ESA, and (3) the data gaps and proposed steps described by ACC in Table 8 of the CSM. ACDEH requests that you submit a workplan for additional

investigation at the site. The workplan must address the technical comments listed below, and be submitted according to the schedule specified in this directive.

TECHNICAL COMMENTS

ACDEH requests that you address the following technical comments in your workplan:

1. **ACDEH 2013 Directive Letters.** In a letter dated 29 April 2013, ACDEH responded to Peralta's 27 March 2013 workplan. In a letter dated 8 July 2013, ACDEH conditionally approved Peralta's revised workplan, dated 14 June 2013. Peralta did not implement the revised workplan. The 14 June 2013 workplan, and ACDEH's approval conditions, shall be incorporated into the updated workplan requested by this directive letter.
2. **Petroleum Plumes in Groundwater From the North Parcels.** Appendix A, Figure 6 depicts two petroleum plumes in groundwater. The larger petroleum plume ("Plume A") extends from a former service station location on the north parcels, onto the south parcel, including beneath the former south parcel service station. The smaller petroleum plume (Plume B") extends westward from the approximate location of a service station shown near the baseball diamond on CSM Figure 4. The plume sources must be assessed, and each plume must be further investigated.
3. **Fully Investigate Releases on the South Parcel.** The extent of subsurface petroleum impacts from former UST systems on the south parcel must be delineated.
4. **Contaminant Source Identification.** Sufficient data must be collected to differentiate between potential contaminant sources. Multiple potential sources are recognized at the site.
5. **Cumulative Analytical Data Tables.** All soil, groundwater, and soil gas data for the site must be summarized in tables. The tables must include all sample results and analytes, and should be subdivided according to the associated UST system or other historical operation. Tables should not be subdivided based on investigation dates or sample collection firms.
6. **Maps of Proposed Sample Locations.** Typical scales for sample location maps for similar sites range from 1 inch: 20 feet, to 1 inch: 60 feet. Smaller map scales (e.g., 1 inch: 200 feet) are insufficient and will be rejected.
7. **Well Surveying and Upload to GeoTracker.** Monitoring well locations MW-1 and MW-4 must be surveyed and coordinates must be uploaded to GeoTracker.
8. **California LUFT Manual.** Investigation methods must conform to the recommendations in the California LUFT Manual, Updated December 2015. Please refer to the 27 June 2016 Technical Resource Document entitled Petroleum Metabolites, published by the San Francisco Bay Regional Water Quality Control Board prior to considering silica gel cleanup. In general, silica gel cleanup is not recommended.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

ACDEH requires a Submittal Acknowledgement Statement, signed by the Responsible Party (RP), as a cover letter to technical reports and submittals. The requirement is described in Attachment 1. The language for the Submittal Acknowledgement Statement is as follows:

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"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 Resources Control Board's GeoTracker website."

TECHNICAL REPORT REQUEST

Please upload technical reports to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- 29 January 2019 – Additional Investigation Workplan
File to be named: RO-384_WP_R_YYYY-MM-DD

If you have any questions, please call me at (510) 567-6721 or send me an electronic mail message at robert.schultz@acgov.org. Online case files are available for review at the following website: <http://www.geotracker.ca.gov>.

Sincerely,



Robert W. Schultz, CHG
Senior Hazardous Materials Specialist

Attachment: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations

cc: Atheria Smith, Peralta Community College District, 333 E. 8th Street, Oakland, CA 94606 (Sent via E-mail to: atheriasmith@peralta.edu)
Kimberly Bunting, ACC Environmental, 7977 Capwell Drive, Oakland, CA 94621 (Sent via E-mail to: kbunting@accenv.com)
Thomas Smith, Garcia Hernández Sawhney LLP, (Sent via E-mail to: tsmith@ghslaw.com)
Paresh Khatri, ACDEH (Sent via E-mail to: paresh.khatri@acgov.org)
Dilan Roe, ACDEH (Sent via E-mail to: dilan.roe@acgov.org)
GeoTracker, eFile

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
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

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.