



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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April 9, 2014

Arkansas Bandag Corporation
PO Box 10048
Fort Smith AR 72917

Mr. Mike Rogers
ABF Freight Systems, Inc.
PO Box 10048
Fort Smith AR 72917
(sent via electronic mail to mkrogers@arkbest.com)

Subject: Work Plan Request; Fuel Leak Case No. RO0003033 and GeoTracker Global ID T0600100018, ABF Freight Systems, 4575 Tidewater Avenue, Oakland, CA 94601

Dear Mr. Rogers:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site, including the *First Semi-Annual 2014 Groundwater Monitoring Report*, dated March 10, 2014, and the *Passive Soil Gas Survey Report*, dated March 20, 2014. The reports were prepared by the Trinity Source Group, Inc (Trinity). Thank you for the reports. The passive soil gas report was submitted to initiate investigations that address the last remaining data gap at the site, principally vapor intrusion from potential waste oil contaminants. As noted in the previous letter, the scope of work was approved as an exploratory survey only as the results are only relative and are not directly comparable to remedial goals; followup confirmation sampling, in accordance with Department of Toxic Substances Control (DTSC), with reproducible results was stated to be required.

ACEH has evaluated site data and recommendations presented in the above-mentioned reports, in conjunction with the case files, and the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on ACEH staff review, we have determined that the site fails to meet the LTCP due to the detection of tetrachloroethene (PCE) in subslab vapor (LTCP General Criteria b [Release Only Consists of Petroleum]). However, the additional data indicates that the release of PCE does not appear to be associated with the former waste oil UST, but is in the vicinity of the drains on the maintenance shop floor. Therefore ACEH is recommending the closure of the fuel leak case and the opening of a Site Cleanup Program (SCP) case (RO0003134) to provide regulatory oversight of the PCE contamination.

At this juncture, ACEH will initiate closure activities for the fuel leak case. Concurrently ACEH requests that you address the following technical comments to address the PCE contamination and send us the documents requested below. Concurrent with this directive letter, ACEH will issue a request for funds for the SCP case.

TECHNICAL COMMENTS

- 1. Work Plan for Delineation of PCE / TCE Contamination** – The referenced passive vapor survey indicated several areas of tetrachloroethene (PCE) and trichloroethene (TCE) contamination beneath the Maintenance Building. One passive location (SG-6) corresponds to a previous subslab vapor point (SVP-2) that detected PCE vapor concentrations substantially above the indoor air Environmental Screening Levels (ESLs) promulgated by the San Francisco Regional Water Quality Control Board (RWQCB) and the Department of Toxic Substance Control (DTSC) modified indoor air screening levels of 2.1 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). A concentration up to 901 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) PCE was detected at SVP-2. Because two passive soil vapor samples (SG-5 and SG-6) detected similar results, ACEH assumes that the second location (SG-5) may contain similar PCE concentrations to SVP-2 if a subslab vapor point were to be installed in proximity to SG-

5. ACEH notes that passive sample location SG-5 is in the vicinity of a floor drain that could be one potential source of subsurface PCE contamination at the site.

Two soil bores were proposed in the passive soil vapor report in order to determine if residual PCE soil contamination is present in the vicinity of the SVP-2 / SG-6 sample location, and further north (north of SG-5) in an effort to define the northern limits of the PCE and TCE contamination. ACEH is in general agreement that additional bore locations are appropriate; however, due to the lack of known source or use areas (except potentially one), it appears prudent to install additional soil bores or vapor points on an approximately 5 foot center grid pattern to help determine the extent of any associated contamination. This is generally recommended in the April 2012 DTSC *Soil Gas Investigations Advisory*, and the strategy is consistent with recommendations contained in the October 2010 *Conducting Contamination Assessment Work at Drycleaning Sites* report issued by the State Coalition for Remediation of Dry Cleaners. This is expected to quickly identify areas of potential concern and to eliminate areas of limited or no concern in order to focus any necessary remedial efforts.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below, according to the following schedule:

- **June 13, 2014** – Work Plan
File to be named: RO3033_WP_R_yyyy-mm-dd

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address does not appear on the cover page of this notification, ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

If you have any questions, please call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

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

cc: Debra Moser, Trinity Source Group, Inc, 500 Chestnut Street, Suite 225, Santa Cruz, CA 95060
(sent via electronic mail to djm@tsgcorp.net)

Leroy Griffin, Oakland Fire Department 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (sent via electronic mail to lgriffin@oaklandnet.com)

Dilan Roe (sent via electronic mail to dilan.roe@acgov.org)
Mark Detterman (sent via electronic mail to mark.detterman@acgov.org)
Electronic File, GeoTracker

Attachment 1

Responsible Party(ies) Legal Requirements/Obligations

REPORT/DATA REQUESTS

These reports/data are being requested pursuant to Division 7 of the California Water Code (Water Quality), Chapter 6.7 of Division 20 of the California Health and Safety Code (Underground Storage of Hazardous Substances), and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations (Underground Storage Tank Regulations).

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (Local Oversight Program [LOP] for unauthorized releases from petroleum Underground Storage Tanks [USTs], and Site Cleanup Program [SCP] for unauthorized releases of non-petroleum hazardous substances) require submission of reports in electronic format pursuant to Chapter 3 of Division 7, Sections 13195 and 13197.5 of the California Water Code, and Chapter 30, Articles 1 and 2, Sections 3890 to 3895 of Division 3 of Title 23 of the California Code of Regulations (23 CCR). Instructions for submission of electronic documents to the ACEH FTP site are provided on the attached "Electronic Report Upload Instructions."

Submission of reports to the ACEH FTP site is in addition to requirements for electronic submittal of information (ESI) to the State Water Resources Control Board's (SWRCB) Geotracker website. In April 2001, the SWRCB adopted 23 CCR, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1 (Electronic Submission of Laboratory Data for UST Reports). Article 12 required electronic submittal of analytical laboratory data submitted in a report to a regulatory agency (effective September 1, 2001), and surveyed locations (latitude, longitude and elevation) of groundwater monitoring wells (effective January 1, 2002) in Electronic Deliverable Format (EDF) to Geotracker. Article 12 was subsequently repealed in 2004 and replaced with Article 30 (Electronic Submittal of Information) which expanded the ESI requirements to include electronic submittal of any report or data required by a regulatory agency from a cleanup site. The expanded ESI submittal requirements for petroleum UST sites subject to the requirements of 23 CCR, Division, 3, Chapter 16, Article 11, became effective December 16, 2004. All other electronic submittals required pursuant to Chapter 30 became effective January 1, 2005. Please visit the SWRCB website for more information on these requirements: (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." 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 6735, 7835, and 7835.1) 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 registered 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 fuel leak case meet this requirement.

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: July 25, 2012 |
| | ISSUE DATE: July 5, 2005 |
| | PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010 |
| SECTION: Miscellaneous Administrative Topics & Procedures | SUBJECT: Electronic Report Upload (ftp) Instructions |

The Alameda County Environmental Cleanup Oversight Programs (petroleum UST 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) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) 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.