



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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April 11, 2013

Ms. Tianna Nourot
Waste Management – California Bay Area
10840 Altamont Pass Road
Livermore, CA 94551
(Sent via E-mail to: TNourot@wm.com)

Southfront LLC
P.O. Box 399
Pleasanton, CA 94566-0399

Subject: Case File Review for SLIC Case RO0003076 and GeoTracker Global ID T10000003066, Waste Management, 6175 Southfront Road, Livermore, CA 94550

Dear Ms. Nourot:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "*Additional Investigation Summary Report at Former Waste Management of Alameda County, Inc. Property, 6175 Southfront Road, Livermore, California,*" dated March 15, 2012 (Report). The Report, which was prepared on behalf of Waste Management of Alameda County, Inc. by Brown and Caldwell, presents results from a site investigation conducted between November 2012 and February 2013. The purpose of the investigation was to

- Evaluate the potential for vapor intrusion to the Break Room/Offices adjacent to a location where vinyl chloride was detected in soil vapor.
- Identify the source of vinyl chloride.
- Collect groundwater samples from first-encountered groundwater.

Benzene and/or vinyl chloride were detected in soil vapor samples at concentrations above their respective reporting limits in three of the five soil vapor samples collected. Vinyl chloride was detected in SG-1 at concentrations up to 15,000 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$).

Sub-slab vapor samples were collected at three locations beneath the Break Room/Offices building on November 15, 2012 and February 2, 2013. Vinyl chloride was detected at concentrations up to $140 \mu\text{g}/\text{m}^3$ in the sub-slab vapor samples collected on November 15, 2012 but was detected at concentrations greater than $3 \mu\text{g}/\text{m}^3$ during the February 2, 2013 sampling event. The two sets of sub-slab vapor samples appear to have been collected and analyzed by different methods. It is not known whether the difference in results between the two sub-slab sampling events represents only natural variability or is partially an artifact of different sampling and analytical methods.

Based upon the results of the November 15, 2012 sub-slab sampling, indoor air samples were collected at two locations inside the Break Room/Offices building and two locations outside the building. Benzene was detected at concentrations exceeding screening levels for commercial land use at all four locations. Because the concentrations at all four locations were similar, the Report indicates that benzene is most likely from ambient sources. We concur that the benzene appears to be primarily from an ambient source rather than vapor intrusion.

Vinyl chloride was not detected above a reporting limit of $0.041 \mu\text{g}/\text{m}^3$ in the ambient or indoor air samples. The Report concludes that the indoor and ambient air data show no evidence of vapor intrusion at the subject site. However, the sub-slab sample data indicate that the potential for vapor intrusion was significantly higher in November 2012 when vinyl chloride was present in the sub-slab rather than February 2013 when vinyl chloride was not detected in the sub-slab. Unfortunately, no indoor air samples were collected in November 2012 when there was a potential for vapor intrusion. Therefore, the assessment of the potential for vapor intrusion is not complete.

In order to complete this assessment, further investigation including sub-slab vapor and indoor air sampling is required. We request that you submit a Work Plan **no later than June 13, 2013** to conduct additional vapor intrusion assessment. The vapor intrusion assessment should include:

- Sub-slab vapor sampling.
- Analysis of sub-slab vapor samples on a real time basis in order to determine whether indoor air sampling should be performed.
- Indoor and ambient air sampling.
- Possible radon analysis in sub-slab and indoor air samples to help assess slab attenuation.

TECHNICAL COMMENTS

1. **Soil Vapor Sampling.** The proposed scope of work in the August 27, 2012 Work Plan Addendum was to collect multi-depth soil vapor samples to define the vertical distribution and to help assess the source of vinyl chloride. The Report indicates that conditions did not allow for the collection of multi-depth soil vapor samples. The source of the vinyl chloride remains unknown although the degradation of chlorinated solvents was suggested in the Report as a possible source.
2. **Inconsistencies between Laboratory Reports and Tables.** There are several minor inconsistencies between the reported analytical results and the Report tables. The vinyl chloride concentration for sample SG-4-9 is reported as $14 \mu\text{g}/\text{m}^3$ on Table 2 but is actually $36 \mu\text{g}/\text{m}^3$ on laboratory analytical reports in the appendix. The reporting limits for vinyl chloride for samples SG-2-7.5 and SG-4-9 are reported as $100 \mu\text{g}/\text{m}^3$ on Table 2 but are actually $80 \mu\text{g}/\text{m}^3$ on laboratory analytical reports in the appendix. On Table 3, the vinyl chloride results for samples SS-1, SS-2, and SS-3 are shown as detections but are identified as Not Detected results on laboratory analytical reports in the appendix.
3. **GeoTracker Compliance** – A review of the State Water Resources Control Board's (SWRCB) GeoTracker website indicates the site has not been claimed and the submitted Report was not uploaded to GeoTracker. Because this is a state requirement, ACEH requests that the site be claimed in GeoTracker by the date identified below. Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. Also, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a

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regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude to sub-meter accuracy using NAD 83. A California licensed surveyor may be required to perform this work. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs, including SLIC programs. Additionally, pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3893, 3894, and 3895, beginning July 1, 2005, the successful submittal of electronic information (i.e. report in PDF format) shall replace the requirement for the submittal of a paper copy. Please claim your site and upload all future submittals to GeoTracker and ACEH's ftp server by the date specified below. Electronic reporting is described below on the attachments.

Additional information regarding the SWRCB's GeoTracker website may be obtained online at http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/ and http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml) or by contacting the GeoTracker Help Desk at geotracker@waterboards.ca.gov or (866) 480-1028.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Jerry Wickham), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **May 10, 2013** – Claim Site in GeoTracker and upload required reports
- **June 13, 2013**– Vapor Intrusion Assessment Work Plan
File to be named: WP_R_yyyy-mm-dd RO3076

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org. Case files can be reviewed online 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.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Attachments: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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cc: Danielle Stefani, Livermore Pleasanton Fire Department, 3560 Nevada St, Pleasanton, CA 94566 (*Sent via E-mail to: dstefani@lpfire.org*)

Colleen Winey (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551 (*Sent via E-mail to: cwiney@zone7water.com*)

Joe Turner, Brown & Caldwell, 10540 White Rock Road, Suite 180, Rancho Cordova, CA 95670 (*Sent via E-mail to: JTurner@BrwnCald.com*)

Donna Drogos, ACEH (*Sent via E-mail to: donna.drogos@acgov.org*)
Jerry Wickham, ACEH (*Sent via E-mail to: jerry.wickham@acgov.org*)

GeoTracker, e-File

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.

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 .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 <://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 .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.