



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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May 18, 2012

Ms. Kaye Patterson
The Salvation Army
601 Webster St
Oakland CA 94607

Subject: Review of Work Plan; Fuel Leak Case No. RO0003084 and Geotracker Global ID T10000003428, The Salvation Army, 601-605 Webster St, Oakland CA 94607

Dear Ms. Patterson:

Alameda County Environmental Health (ACEH) staff has reviewed the case file, including the August 8, 2011 *Underground Storage Tank Removal Report*, prepared by Terry Hamilton, General Engineering Contractor, and the March 18, 2011 *Subsurface Investigation Workplan, Salvation Army, 601 Webster St, Oakland California*, prepared by ATC Associates, Inc (ATC). The tank removal report indicates that on November 2, 2010 two underground storage tanks (USTs), one 10,000-gallon diesel and one 8,000-gallon gasoline, were removed from the site. Visibly impacted soil was reported at the base of the tank pit at approximately 14 feet below the ground surface. Contaminant levels in the soil were reported to include up to 17,000 milligrams per kilogram (mg/kg) total petroleum hydrocarbons as gasoline (TPHg) and 300 mg/kg benzene.

Additionally, background information contained in the UST Removal Report indicated one or more USTs were removed from the site in approximately 2000. The report stated "A visual soil investigation was performed during the removal and before the new USTs were installed, and the pit was aerated for an unknown period of time before two new USTs were installed." The aeration of the tank pit indicates contamination was observed at the time of the 2000 UST removal.

ATC proposes performing a subsurface investigation to evaluate the extent of impacted soil and groundwater at the site with the installation of five or six Geoprobe borings advanced to first encountered groundwater, and analysis of soil and groundwater.

We request that you address the following technical comments and send us a work plan addendum/revised work plan as requested below. We request that you address the following technical comments.

TECHNICAL COMMENTS

1. **GeoTracker Compliance** — A review of the State Water Resources Control Board's (SWRCB) GeoTracker website indicates the site has not been claimed. Because this is a state requirement, ACEH requests that the site be claimed in and all reports uploaded to 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 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.

2. **Boring Locations**— Rather than boring locations indicated in the work plan, we request that your borings be installed in a transect along Franklin Street and perpendicular to Franklin Street on the southern side of the UST pit to locate the contamination associated with this site. This may involve additional borings to obtain an appropriate spacing along the transect. It appears the groundwater gradient is to the south and southwest. Also an additional source area boring adjacent to the pit in the vicinity of 7th Street would provide some lateral definition in this direction. Please submit a work plan addendum consisting of a revised soil boring location map by the date below.
3. **Soil Sample and Analysis**— The work plan proposes to collect one to two soil samples per boring for laboratory analysis. The purpose of the investigation is to define the horizontal and vertical extent of contamination. To preclude miscommunication ACEH requests that soil samples be collected, and submitted for analysis, at signs of contamination (odor, discoloration, PID responses, etc.), at significant changes in lithology, and at the soil/groundwater interface for all soil bores, with samples sufficient to define the vertical extent of contamination. ACEH requests that the PID soil screening data be included on the bore logs.
4. **Groundwater Sample and Analysis**— The “oscillation” method described for recovering the water samples is problematic due to agitation of the water, possibly biasing low the volatile compounds in the samples. We request that a less aggressive groundwater sample recovery method, such as peristaltic pump, be used for sample recovery.
5. **Site Map**— Please depict your graphics on an extended site map utilizing an aerial photographic base showing the facility in relation to its' immediate surrounding properties. All site maps must contain a measured graphic scale, as opposed to a ratio or fraction scale, accurately depicting distances on the site map. This applies to all future maps submitted for this site.

TECHNICAL REPORT REQUEST

- **June 4, 2012**—Claim site and upload all reports in GeoTracker
- **June 4, 2012**—Work plan addendum consisting of a revised soil boring location map
- **Due within 60 Days Following Work Plan Addendum approval**—Soil and Groundwater Investigation Report

Thank you for your cooperation. 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

Enclosure: Responsible Party(ies) Legal Requirements/Obligations
ACEH Electronic Report Upload (ftp) Instructions

cc: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (*Sent via E-mail to: lgriffin@oaklandnet.com*)
Kaye Patterson, The Salvation Army, 601 Webster St, Oakland CA 94607
(*Sent via Email to: kaye.patterson@usw.salvationarmy.org*)
Michael Sonke, ATC Associates Inc., 1117 Lone Palm Ave, Ste B, Modesto, CA 95351
(*Sent via Email to: mike.sonke@atcassociates.com*)
Donna Drogos, ACEH (*Sent via E-mail to: donna.drogos@acgov.org*)
Keith Nowell, ACEH (*Sent via E-mail to keith.nowell@acgov.org*)
GeoTracker
File

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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) 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 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 Spills, Leaks, Investigations, and Cleanup (SLIC) 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 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, 6835, 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, later 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 SLIC)	REVISION DATE: July 20, 2010
	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 (LOP and SLIC) 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.