



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

February 24, 2015

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 mrogers@arcb.com)

Subject: Modified Work Plan Approval; Fuel Leak Case No. RO0003033 and GeoTracker Global ID T0600100018, and Site Cleanup Program Case No. RO0003134 and GeoTracker Global ID T00000005825; ABF Freight Systems and ABF Freight Maintenance Shop, 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 *Data Gap Investigation Work Plan and Focused Site Conceptual Model*, dated January 9, 2015, and prepared by the Trinity Source Group, Inc (Trinity). Thank you for submitting the work plan. The work plan was considered by Trinity to be an appropriate initial response to both the petroleum and chlorinated solvent cases at the subject site.

Based on ACEH staff review of the referenced documents and of the case file we generally concur with the recently proposed scope of work, provided that the modifications requested in the technical comments below are addressed and incorporated during the implementation, unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed. We request that you address the following technical comments, submit the requested document, and upon ACEH approval, perform the proposed work, and send us the technical reports requested below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- 1. Identification of Release Location(s)** – The referenced work plan proposes a video survey of the onsite sanitary sewer lines in an effort to determine potential release locations that may be associated with the onsite sanitary sewer. Providing that the sanitary sewer laterals beneath the building, and not the nearby underground storage tank (UST), is the potential source of the Light Non-Aqueous Phased Liquid (LNAPL) and the chlorinated solvents (PCE and TCE), this appears to be a reasonable approach.

The work plan indicates that followup hand augered and/or direct push soil bores may potentially be installed, but at unspecified locations due to the uncertain location of potential sewer line breaks. ACEH is in general agreement with this approach; however, judges that soil bores will be required to define the extent of LNAPL downgradient of SB-4 (and likely towards the southwest). ACEH is also concerned that the installation of temporary soil bores may not suffice in determining if the LNAPL has been removed to the extent practicable. Additional actions, such as a recovery well, may be required. With the intent of shortening the investigation phase, ACEH requests the submittal of a data packet including the video survey results, any data, and

preliminary recommendations for additional actions in a step-wise, potentially iterative process, by the date identified below, prior to submitting a summary report for the investigation.

2. **Proposed Use of Silica Gel Cleanup** – In October 2014 the staff toxicologist for the San Francisco Bay Regional Water Quality Control Board (RWQCB) clarified the position of the RWQCB on the use of Silica Gel Cleanup (SGC) at sites and stated that when SGC is used duplicate samples must be submitted. Of significance for this site is the proximity of the estuary shoreline to the site. The RWQCB specifically emphasized the effect of SGC on the length of a groundwater plume, including degraded hydrocarbon (polar) products, and the toxicity to aquatic life posed by the degraded hydrocarbon (polar) products. In order to maintain consistency with the RWQCB, ACEH requests that duplicate soil and groundwater samples be submitted for samples in which SGC is requested to be analyzed for.
3. **Laboratory Analysis** – Please additionally include methyl-tert butyl ether (MTBE) the suite; there is no added cost and analysis for the chemical is required by the Low Threat Closure Policy.
4. **Groundwater Monitoring** – Due to the length of time since groundwater was monitored (February 2014), ACEH requests that groundwater monitoring be resumed at the site. Please place the site in a semi-annual groundwater monitoring program with sampling in February (or earliest thereafter) and August of a year. Please include naphthalene and chlorinated solvents into the analytical suite. Please submit reports by the dates identified below.

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:

- **April 10, 2015** – Data Packet and Recommendations (by email)
File to be named: RO3033__R_YYYY-mm-dd
- **May 29, 2015** – First Semiannual 2015 Groundwater Monitoring Report
File to be named: RO3033_GWM_R_YYYY-mm-dd
- **June 12, 2013** – Site Investigation (Tentative date)
File to be named: RO3033_SWI_R_YYYY-mm-dd
- **October 23, 2015** – Second Semiannual 2015 Groundwater Monitoring Report
File to be named: RO3033_GWM_R_YYYY-mm-dd

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.

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

Mr. Mike Rogers
RO0003033
February 24, 2015, Page 3

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

Dilan Roe, ACEH, (sent via electronic mail to dilan.roe@acgov.org)

Mark Detterman, ACEH, (sent via electronic mail to mark.detterman@acgov.org)

Electronic File, GeoTracker

Attachment 1

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: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 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.