

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**  
AGENCY

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH  
LOCAL OVERSIGHT PROGRAM (LOP) FOR  
HAZARDOUS MATERIALS RELEASES  
1131 HARBOR BAY PARKWAY  
ALAMEDA, CA 94502  
(510) 567-6700  
FAX (510) 337-9335

November 16, 2017

Housing Authority of the City of Oakland  
1619 Harrison Square  
Oakland, CA 94612  
Attn.: Clinton Loftman  
(Sent via electronic mail to: [cloftman@oakha.org](mailto:cloftman@oakha.org))

Subject: Conditional Work Plan Approval, Fuel Leak Case No. RO0003232 and GeoTracker Global ID T10000009472, 1110 Jackson Street, Oakland, CA 94607

Dear Mr. Loftman:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the recently submitted document entitled *Work Plan for Supplemental Environmental Assessment* (Work Plan), dated October 12, 2017 and prepared by Langan Engineering and Environmental Services, Inc. (Langan) for the subject site. The proposed scope of work presented in the Work Plan consists of advancing four soil borings to delineate the vertical and horizontal extent of groundwater contamination previously identified at the site. The location of the proposed bores are depicted on Figure 2 of the referenced document. The borings will be advanced to five feet below the ground surface (bgs) with a hand auger to clear the location for buried utilities, where utilities potentially exist, then advanced to a maximum depth of 45 feet bgs utilizing a dual-tube direct-push sampling system. Final boring depths will be based on headspace readings which will be collected every vertical foot.

Soil samples are proposed to be collected about every five feet until groundwater is encountered. Soils will be examined in the field for evidence of contamination, including visible staining, odors, and elevated headspace readings on a photoionization detector (PID). Soil samples will be analyzed for volatile organic compounds (VOCs) by United States Environmental Protection Agency (EPA) test method 8260 and total petroleum hydrocarbons (TPH) as gasoline (TPHg), TPH as diesel (TPHd) and TPH as motor oil (TPHmo) by EPA method 8015B.

As presented in the Work Plan, Langan proposes to collect two grab-groundwater (GGW) samples from each boring location. The "shallow" groundwater sample will be collected within the first 10 feet of encountered groundwater from a 10-foot screen. The "deep" groundwater sample will be collected once two consecutive zero parts per million (PPM) headspace readings are recorded by the PID. When this criteria is met, the boring will be advanced an additional five feet to collect the "deep" sample. GGW samples will be analyzed for VOCs by EPA method 8260 and TPHg, TPHd and TPHmo by EPA method 8015B.

ACDEH is in general agreement with the proposed scope of work. The proposed scope of work may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed.

### **TECHNICAL COMMENTS**

1. **Nearby Wells** – A Site Conceptual Model (SCM) is provided in Appendix B of the Work Plan. In Element 3 of the SCM, entitled *Nearby Wells*, Langan reports that the State Water Resources Control Board's (SWRCB) Groundwater Ambient Monitoring and Assessment (GAMA) website was reviewed in July 2017 and no municipal supply wells were shown within 1,000 feet of the site. Langan also states that the California Department of Water

Resources (DWR) was contacted for information on permitted wells in the vicinity of the site; however, DWR responded to the request by noting a there was a three month delay for the requested information.

ACDEH notes the date of the request to DWR is not specified under the Description header of SCM Element 3 and does not indicate that the data will be incorporated into the SCM when received. ACDEH requests the SCM be updated in future presentations to include the DWR request date and language indicating the information will be incorporated into the SCM when received. This data gap can be removed once the information is incorporated into the SCM.

ACDEH additionally requests the Alameda County Public Works Agency (ACPWA) be contacted for a well search of its database. Note that the contaminant plume is undefined and the SWRCB Low Threat Underground Storage Tank Case Closure Policy (LTCP) uses the distance between the leading edge of the plume to supply wells and surface water bodies in their Media Specific Groundwater evaluation.

2. **Soil Sampling** – As indicated in the Work Plan, soil samples are proposed to be collected about every five feet until groundwater is encountered. Since the goal of this investigation is to determine the lateral, down gradient, and vertical extent of TPH contamination in soil and groundwater beneath the site, ACDEH recommends collection and analysis of soil samples at intervals of no more than five feet, areas of obvious contamination, the soil/groundwater interface, and at significant changes in lithology. If staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number of soil samples from this interval should be submitted for laboratory analyses to characterize the fuel hydrocarbon concentrations within this interval. Please ensure that the analytical results define the vertical and horizontal extent of TPH impacts at the site. This also applies to soil within the zone of groundwater fluctuation, also known as the “smear zone”, and soil below the water table.

Additionally, in order to satisfy the LTCP Media Specific Direct Contact evaluation, ACDEH requests collection and analyses of soil samples include the 0-to 5-foot interval.

3. **Contingency GGW Sampling** – As indicated above, Langan proposes to collect two GGW samples from each proposed boring location with the sampling depth of the “deeper” sample based headspace PID readings. As discussed in our phone conversation on November 16, 2017 with Joshua Graber of Langan, ACDEH expressed the opinion that it is possible the headspace criteria presented in the Work Plan may be met at first encountered water, resulting in the “deeper” GGW sample collected at the same depth as the “shallow” one. As a result, ACDEH requested that, if the headspace criteria are met at the same depth as the “shallow” groundwater, that the “deeper” GGW sample be collected 10 feet below the depth of the “shallow” one.
4. **Additional Soil Bore** – ACDEH noted that the GGW sample collected from bore EB-6, located in the apparent down gradient of the first three of the four underground storage tanks (USTs) removed at the site, was reported to contain 290 micrograms per liter (ug/L) TPHd. ACDEH requests an additional soil bore farther down gradient of the EB-6 location be advanced near the eastern property boundary along a line extending through the proposed EB-9 location and the EB-5 location. The requested bore location is in the vicinity of an FCO depicted on Figure 2.

## Technical Report Request

Please upload technical reports to the ACDEH FTP site (Attention: Keith Nowell), and to the SWRCB’s GeoTracker website, in accordance with the following specified file naming convention and schedule:

- **February 15, 2018 – Limited Soil and Groundwater Investigation**  
(file to be named name: RO0003232\_SWI\_R\_yyyy- mm-dd).

Mr. Clinton Loftman  
RO0003232  
November 16, 2017, Page 3

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.

ACDEH looks forward to working with you and your consultants to advance the case toward closure. 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](mailto:keith.nowell@acgov.org).

Sincerely,

Keith Nowell PG, CHG  
Hazardous Materials Specialist

Enclosure: Responsible Party(ies) Legal Requirements/Obligations  
ACDEH Electronic Report Upload (FTP) Instructions

CC: East Bay Asian Local Development Corporation, 1825 San Pablo Ave., Suite 200, Oakland, CA 94612  
Attn.: Everett Cleveland Jr., (*Sent via electronic mail to: [ecleveland@ebaldc.org](mailto:ecleveland@ebaldc.org)*)

Joshua Graber, Langan Engineering and Environmental Services, Inc., 501 14<sup>th</sup> Street, 3<sup>rd</sup> Floor,  
Oakland, California 9612 (*Sent via electronic mail to: [jgraber@langan.com](mailto:jgraber@langan.com)*)

Dilan Roe, ACDEH (*Sent via electronic mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org)*)

Paresh Khatri, ACDEH (*Sent via electronic mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org)*)

Keith Nowell, ACDEH (*Sent via electronic mail to: [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org)*)

GeoTracker / File

## 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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) 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 File Transfer Protocol (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 SCP 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 ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)) for more information on these requirements.

#### 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 ACDEH's FTP server and the SWRCB's GeoTracker website." 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 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. 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 case meet this requirement. 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

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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> December 1, 2016
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions


The Alameda County Environmental Cleanup Oversight Programs (LOP 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 acknowledgement 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](mailto: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) Open File Explorer using the Windows  key + E keyboard shortcut.
    - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
  - b) On the address bar, type in ftp://alcoftp1.acgov.org.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
  - d) Click Log On.
  - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - f) 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](mailto: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.