

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

COLLEEN CHAWLA, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP) FOR
HAZARDOUS MATERIALS RELEASES
1131 HARBOR BAY PARKWAY
ALAMEDA, CA 94502
(510) 567-6700
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June 22, 2018

Union Pacific Railroad
1408 Middle Harbor Road

Attn.: Lauren Mancuso (*Sent via electronic mail to lamancus@up.com*)

Subject: Site Cleanup Program Case RO0003306 – West Oakland (Union Pacific Railroad), 1400 Middle Harbor Road, Oakland 94607; GeoTracker Global ID T10000011592

Dear Lauren Mancuso:

Alameda County Department of Environmental Health (ACDEH) is providing regulatory oversight for the subject Site Cleanup Program (SCP) case. ACDEH provided Union Pacific Railroad (UPR) with a Voluntary Remedial Action Program Agreement (VRAPA) on May 1, 2018. Our records indicate the VRAPA has not been completed and returned to our agency. In a good faith attempt to avoid a delay of the project schedule, I have been authorized to proceed in a limited capacity for this case. ACDEH requests the return of the completed VRAPA for our agency to continue with oversight activities.

On June 7, 2018, ACDEH was provided the document *Work Plan for Environmental Support During System Upgrades* (Work Plan), dated June 7, 2018 and prepared by Arcadis U.S., Inc. (Arcadis). The Work Plan was provided as an attachment to an electronic mail. As presented, the work being performed includes replacement of a concrete locomotive fueling pad at the subject site. Arcadis will be providing environmental support by performing visual observations and collecting and submitting soil samples for analysis. As part of its role in the system upgrades, Arcadis will coordinate, observe, and/or manage removal, characterization, and offsite disposal of excavated material.

Arcadis states soil removal will be limited to the dimensions of the concrete pad, with approximately 12,500 square feet of concrete anticipated to be removed. Soil beneath the concrete slab is planned to be excavated to a depth of one foot below the bottom of the concrete. If petroleum hydrocarbon (PH) impacted soil is observed at the bottom of the excavation, the soil will be removed to a maximum depth of four feet below ground surface (bgs) as the depth to groundwater is anticipated to be as shallow as five feet bgs.

As the maximum excavation depth of four feet is proposed, groundwater is not anticipated to be encountered during excavation activities. However, if groundwater is encountered, it will be pumped from the excavation and discharge into sumps connected to the onsite wastewater treatment facility.

Arcadis proposes post-excavation in-place sidewall soil samples will be collected following excavation activities. Samples will be collected at an approximate rate of one sample per 100 linear feet of excavation sidewall. A minimum of one sample will be collected from each sidewall. The soil samples will be analyzed for total PH (TPH) as-diesel (TPHd) and TPH as motor oil (TPHmo) by USEPA Method 8015B. The analytical results for in-place soil samples will be compared to San Francisco Bay Regional Water Quality Control Board (Region 2) commercial/industrial worker exposure scenario (February 2016) Environmental Screening Levels (ESLs). Arcadis identifies the appropriate ESLs for TPHd as 1,100 milligrams per kilogram (mg/kg) and as 140,000 mg/kg for TPHmo.

Additionally, representative concrete slab samples and stockpiled soil will be analyzed for waste profiling for disposal.

TECHNICAL COMMENTS

- 1. Dimensions of the Area of Concern** – ACDEH representative Keith Nowell viewed the locomotive fueling pad in conjunction with an on-site meeting held on May 11, 2018. The meeting was scheduled to discuss the project as a work plan describing proposed activities had yet to be provided to our agency. Though not measured during the site visit, Mr. Nowell does not recall the fueling pad length to be the approximately 2,500 feet depicted in Figure 2 of the Work Plan. Therefore, ACDEH requests the length of the locomotive fueling pad, excavation dimensions and graphic scale shown on Figure 2 be reviewed for accuracy. If the dimensioning is incorrect, please provide an updated area/volume calculation of material to be removed in the document requested below. Additionally please provide an updated Figure 2, if warranted, in the requested report.
- 2. Cross Sections** – ACDEH requests preparation of figures consisting of cross sections along the length and breadth of the proposed excavation area(s) to be included in the document requested below. Please show the existing structures in the immediate vicinity of the excavation area(s), including sump(s), tracks, platform(s), etc., and the anticipated depths of the excavation, e.g. one-foot and four-foot depths beneath the fueling pad depicting the area(s) to be excavated.
- 3. Confirmation Sampling** – It is unclear to our agency if the excavation area will approach the concrete sump(s) walls leaving soil to buttress the sump(s) walls or if the sump(s) walls will be free-standing and unsupported during excavation activities. We request this clarification as the characterization of the residual, post excavation soil will include soil buttressing the sump(s), if present. Please discuss the anticipated lengths of the excavation sidewalls anticipated to be sampled in the report requested below.

As presented above, Arcadis proposes to conduct sidewall confirmation sampling at an approximate rate of one sample per 100 linear feet, with a minimum of one sample collected from each sidewall. The sampling density proposed is inadequate to characterize potential residual contamination that may be present in the excavation. ACDEH requests the collection of one soil sample per 25 linear feet of excavation sidewall. ACDEH generally agrees with the minimum of one sample collected from each sidewall for areas of limited extent, such as when pursuing contaminated soil which exceeds the appropriate ESLs.

Arcadis does not address collection of excavation bottom samples. As presented in the May 11, 2018 meeting, ACDEH requests the collection and analysis of excavation base soil samples. Please collect the samples at an approximate rate of one sample per 250 square-feet of excavation floor.

- 4. Scope of Analyses** – In addition to the TPHd and TPHmo analyses proposed by Arcadis, ACDEH requests the addition of naphthalene and polycyclic aromatic hydrocarbons (PAHs) to the analysis scope due to the potential presence of these constituents in red diesel. These compounds may be identified using the EPA test method 8270.

The Work Plan does not specify if the proposed TPH analyses will be conducted using silica gel cleanup (SGC). For consistency with Region 2, ACDEH requests the TPH analyses be conducted without the use of SGC.

- 5. Groundwater Contamination** – As presented above, groundwater is not anticipated to be encountered during excavation activities as the maximum excavation depth of four feet proposed by Arcadis is above the anticipated depth to water. If residual contamination is determined to be present at the base of the excavation, please present a plan to delineate the extent of contaminated groundwater in the report requested below.

Arcadis states that if groundwater is encountered, it will be pumped from the excavation and discharge into sumps connected to the onsite wastewater treatment facility. Please provide ACDEH with documentation groundwater can effectively be treated prior to disposal. ACDEH requests a copy of the National Pollutant

Discharge Elimination System (NPDES) permit for the wastewater treatment facility for our review. Include the permit as an attachment to the document requested below.

Technical Report Request

Please upload technical reports to the State Water Resources Control Board's (SWRCBs) GeoTracker website, in accordance with the following specified file naming convention and schedule. Submittals to the SWRCBs GeoTracker website require an acknowledgment statement and must be signed and stamped by an appropriately licensed professional.

- **August 6, 2018– Work Plan Addendum** (file name: RO0003306_WP_ADEND_R_yyyy-mm-dd)

Thank you for your cooperation. 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.

Sincerely,

Keith Nowell, PG, CHG
Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements/Obligations

cc: Cameron McGovern, Union Pacific Railroad, (*Sent via electronic mail to cjmcgove@up.com*)

Scott Hackman, ARCADIS U.S., Inc., 101 Creekside Ridge Court, Suite 200, Roseville, CA 95678 (*Sent via electronic mail to scott.hackman@arcadis-us.com*)

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

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

Keith Nowell, ACDEH, (*Sent via electronic mail keith.nowell@acgov.org*)

Geotracker, Electronic File

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

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 the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

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 and include the professional registration stamp, signature, and statement of professional certification. 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

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.