



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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June 24, 2016

East Bay Municipal Utility District
c/o Environmental Compliance Section
375 Eleventh Street MS #704
Oakland, CA 94607-4240
Attn.: Mr. John Walter
(Sent via electronic mail to: jwalter@ebmud.com)

Subject: Fuel Leak Case No. RO0000030 and Geotracker Global ID T0600102115, EBMUD,
1200 21st Street, Oakland, CA 94607

Dear Mr. Walter:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the document entitled *Adeline Maintenance Center Technical Memo* (TM), dated June 30, 2015, and prepared by AECOM for the subject site. The TM documents the remediation history at the site and presents a data review of a soil and groundwater investigation conducted by Alisto Engineering Group (Alisto) in a report dated May 21, 2009. The data review was performed in conjunction with the State Water Resources Control Board (SWRCB) Low Threat Underground Storage Tank Case Closure Policy (LTCP).

Based on the comparison of the 2009 soil sampling analytical results to the LTCP criteria, AECOM concluded that no concentrations of benzene, ethylbenzene, or naphthalene in soil exceed thresholds for direct contact or outdoor exposure in shallow soils. Based on this, AECOM recommended no further soil characterization.

Based on the 2009 grab groundwater analytical results, the hydrocarbon contaminant plumes in areas of concern AOC-1 and AOC-3 are not defined laterally and the plume at AOC-2 is not defined to the north.

AECOM reported concentrations of benzene, ethylbenzene, and naphthalene were below their respective Regional Water Quality Control Board (RWQCB) environmental screening levels (ESLs) for vapor intrusion resulting in the low potential for soil vapor risk. Therefore, no soil vapor sampling was recommended.

Based in its findings, AECOM recommended the installation of groundwater monitoring wells in areas AOC-1 and AOC-3 to determine the lateral extent of the hydrocarbon plume in each area.

TECHNICAL COMMENTS

- 1. Electronic Submittal of Information** – A review of the case file reveals few documents have been submitted to the State Water Resources Control Board (SWRCB) GeoTracker website, thus rendering the case to a non-compliant status pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3890 to 3895. In addition to

investigation reports (GEO_REPORTs), missing documentation includes figures, (GEO_MAPs), bore logs (GEO_BOREs), and laboratory analysis data files (EDFs).

ACEH requests that you upload the missing documents and provide ACEH a list of the documents submitted to GeoTracker. ACEH requests the list be provided via electronic mail, Attn: Keith Nowell, by the date specified below.

2. **Data Review Update** – The ESLs have been updated since the preparation of the TM. Therefore, ACEH requests an update of the data review performed for the TM using the current ESL values. Please present the updated data review in the report requested below by the date specified below.
3. **Sensitive Receptor Survey** – ACEH is of the opinion it is premature to perform a contaminant plume delineation study. Prior to making a determination regarding a groundwater study, ACEH requests that a sensitive receptor survey be conducted for the site. ACEH requests preparation of a work plan for a sensitive receptor survey for submittal by the date specified below.
4. **Meeting** – ACEH will request a meeting following ACEH approval and implementation of the work plan requested in Technical Comment 2 above. Following a review of the sensitive receptor survey report, ACEH will schedule a meeting to discuss a path to closure strategy with regard to the LTCP.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Keith Nowell), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **July 25, 2016** – Electronic Submittal of Information to GeoTracker
- **July 25, 2016** – List of Documents submitted to GeoTracker (to be provided via electronic mail, Attn: Keith Nowell)
- **August 26, 2016** – Data Review Update (file name: RO0000030_SWI_ADEND_R_yyyy-mm-dd)
- **August 26, 2016** – Work Plan for a Sensitive Receptor Survey (file name: RO0000030_WP_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.

Thank you for your cooperation. ACEH 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.

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Respectfully,

Keith Nowell PG, CHG
Hazardous Materials Specialist

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

cc: Dilan Roe, ACEH (*Sent via electronic mail to: dilan.roe@acgov.org*)
Keith Nowell, ACEH (*Sent via electronic mail to: 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

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.