

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

COLLEEN CHAWLA, Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY, SUITE 250
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

April 2, 2018

City of Emeryville
Successor to Emeryville Redevelopment Agency
c/o Nancy Humphrey
1333 Park Ave.
Emeryville, CA 94608
(Sent via electronic mail to: nhumphrey@ci.emeryville.ca.us)

Park Emery Assoc. LTD Partnership
Address Unknown

Longs Drug Stores California, Inc.
c/o CVS #9553-01
One CVS Drive, Mail Code 2340
Woonsocket, RI 02895
(Sent via electronic mail to: Nadine.King@CVSCaremark.com)

Subject: Groundwater Monitoring Request; Fuel Leak Case No. RO0000068 and GeoTracker Global ID T0600101848, City of Emeryville Fire Station, 4331 San Pablo Avenue, Emeryville, CA 94608

Dear Responsible Parties:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *Phase II Data Gap Investigation Report*, dated February 7, 2018. The report was submitted on your behalf by OTC Enviroengineering Solutions, Inc. (OTC). Thank you for submitting it. The report documented the installation of three soil bores and two groundwater monitoring wells. A sensitive receptor survey and a water well and surface water body survey were not reported on as requested in the directive letter dated June 6, 2017.

Based on the review of the case file, ACDEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

- 1. Quarterly Groundwater Monitoring** – The referenced report proposes to place the two groundwater monitoring wells into a quarterly groundwater monitoring program. ACDEH is in agreement with this recommendation. Please submit quarterly groundwater monitoring reports by the dates referenced below.
- 2. Groundwater Analytical Suite** – Due to very limited, or the non-detectable, chlorinated volatile organic and semi-volatile organic compounds in soil and groundwater at the site, especially in proximity to the former sump location, it does not appear that a full scan EPA 8260 analysis, or semi-volatile organic analysis by EPA 8270 are required in the future at the site. Please ensure that only petroleum hydrocarbon compounds, including Total Petroleum Hydrocarbons as gasoline (TPHg), as diesel (TPHd) and as motor oil (TPHmo), and benzene, toluene, ethylbenzene, total xylenes, MTBE, and naphthalene are analyzed for in groundwater samples collected at the site.
- 3. Water Well and Surface Water Body Surveys** – Because the *Phase II Data Gap Investigation Work Plan*, dated April 6, 2017 proposed utilizing theoretical maximum groundwater plume lengths as defined by the *Technical Justification for Groundwater Media-Specific Criteria*, (State Water Board, April 24, 2012), ACDEH requests that the first groundwater monitoring report include a water well and surface water body survey that encompass a radius of 2,000 feet from the corners of the site. This will determine if any well or water body is within 1,000 feet of the maximum methyl tert butyl ether (MTBE) plume length.

- 4. Sensitive Receptor Basement Survey** – In areas with high groundwater such as Emeryville, dewatering pumps for basements or other subsurface structures can capture and discharge a groundwater plume to surface conveyance, including curbside discharges, wherein the discharge becomes a non-point source. To ensure that there are no subsurface (basement) dewatering structures within 1,000 feet of the site, ACDEH requests that a street-side review of properties within 1,000 feet of the downgradient groundwater flow direction be conducted and included in the first quarterly groundwater monitoring report. Please base groundwater flow direction on site data, and vicinity sites. Because of the typical large parcel sizes in the vicinity, this is not anticipated to require significant resources.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

Please note that ACDEH has updated Attachment 1 with regard to report submittals to ACDEH. ACDEH will now be requiring a Submittal Acknowledgement Statement, replacing the Perjury Statement, as a cover letter signed by the Responsible Party (RP). The language for the Submittal Acknowledgement Statement is as follows:

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.

Please make this change to your submittals to ACDEH.

TECHNICAL REPORT REQUEST

Please submit the following technical reports and deliverables to the State Water Board's Geotracker website and notify your case worker by electronic mail (mark.detterman@acgov.org), in accordance with the following specified file naming convention and schedule, as provided below, and in the Responsible Party(ies) Legal Requirements/Obligations which is included as Attachment 1. Please note ACDEH no longer accepts reports on the ftp site:

- **May 4, 2018** – First Quarter 2018 Groundwater Monitoring Report, Sensitive Receptor Survey, Well and Water Body Survey
File to be named: RO68_GWM_R_yyyy-mm-dd
- **August 3, 2018** – Second Quarter 2018 Groundwater Monitoring Report
File to be named: RO68_GWM_R_yyyy-mm-dd
- **November 2, 2018** – Second Quarter 2018 Groundwater Monitoring Report
File to be named: RO68_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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address is not listed on the first page of this letter, or in the list of cc's listed below, ACEH is requesting your email address to help expedite communications and to help lower overall costs.

Responsible Parties
RO0000068
April 2, 2018, Page 3

Thank you for your cooperation. Should you have any questions, please contact 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 and
Electronic Report Upload (ftp) Instructions

cc: Xinggang Tong, OTG Engineering, Solutions, Inc, 770 Edgewater Drive, Suite 260, Oakland, CA
94621; (Sent via electronic mail to: xtong@otgenv.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)

Mark Detterman, ACDEH, (Sent via electronic mail to: mark.detterman@acgov.org)

Electronic File; GeoTracker

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.