

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL PROTECTION
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June 20, 2008

Ms. June Weirich
Greyhound Lines, Inc.
P.O. Box 660632
Dallas, TX 75266-0362

Subject: Fuel Leak Case No. RO0000074 and Geotracker Global ID T0600100666, Oakland Bus Terminal, 2103 San Pablo Avenue, Oakland, CA 94608

Dear Ms. Weirich:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the document entitled, "Closure Report for No Further Action," dated June 15, 2000, which was prepared by Parsons Engineering Science (Parsons) for the subject site to determine whether the site qualifies for case closure. In April 1990, six underground storage tanks (USTs) were removed from the site. In a subsequent subsurface investigation, free product was detected in site groundwater monitoring wells. Between January 1993 and January 1997, a free product recovery system was operated at the site. According to Parsons, approximately 1,015 gallons of free product and groundwater was recovered and 82,610 gallons of carbon treated groundwater was discharged to the sanitary sewer. In October 1997, a groundwater sample collected from monitoring well BC-1 detected total petroleum hydrocarbons (TPH) as diesel (d) at a concentration of 484,000 µg/L, which is typically indicative of "free product." The TPH-d concentration detected on-site is significantly above the San Francisco Bay Regional Water Quality Control Board's (SFBRWQCB) Environmental Screening Level of 100 µg/L for TPH-d indicating that there is a potential risk to human health and the environment. Based on the review of site conditions, ACEH cannot consider case closure for the subject site at this time. This decision to deny closure is subject to appeal to the State Water Resources Control Board (SWRCB), pursuant to Section 25299.39.2(b) of the Health and Safety Code (Thompson-Richter Underground Storage Tank Reform Act - Senate Bill 562). Please contact the SWRCB Underground Storage Tank Program at (916) 341-5851 for information regarding the appeal process.

We request that you address the following technical comments, perform the proposed work, and send us the technical reports and work plan requested below.

TECHNICAL COMMENTS

1. **Contaminant Source Area Characterization** – In April 1990, six USTs were excavated and removed from the site. A tank removal report dated December 12, 1992 was submitted to ACEH. However, the report did not contain any confirmation soil sampling analytical data or depth of the excavation, nor is it clear if any groundwater was encountered during tank removal activities. Since elevated TPH-d concentrations were detected in monitoring well BC-1 and no confirmation sampling data was submitted, the extent of contamination in the

source area appears undefined at this time. Please propose a scope of work to address the above-mentioned concerns and submit a work plan.

2. **Site Conceptual Model** – We anticipate that possible characterization and future remediation work, in addition to what is requested in this letter, may be necessary at and down-gradient from your site. Considerable cost savings can be realized if your consultant focuses on developing and refining a viable Site Conceptual Model (SCM) for the project. A SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely magnitude of potential impacts to receptors. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. At this point, the SCM is said to be “validated.” The validated SCM then forms the foundation for developing the most cost-effective corrective action plan to protect existing and potential receptors.

When performed properly, the process of developing, refining and ultimately validating the SCM effectively guides the scope of the entire site investigation. We have identified, based on our review of existing data, some initial key data gaps in this letter and have described several tasks that we believe will provide important new data to refine the SCM. We request that your consultant incorporate the results of the new work requested in this letter into their SCM, identify new and/or remaining data gaps, and propose supplemental tasks for future investigations. There may need to be additional phases of investigations, each building on the results of prior work, to validate the SCM. Characterizing the site in this manner will focus the scope of work to address the identified data gaps, which improves the efficiency of the work, and limit its overall costs.

Both industry and the regulatory community endorse the SCM approach. Technical guidance for developing SCMs is presented in “Strategies for Characterizing Subsurface Releases of Gasoline Containing MTBE,” American Petroleum Institute Publication No. 4699 dated February 2000; “Expedited Site Assessment Tools for Underground Storage Tank Sites: A Guide for Regulators” (EPA 510-B-97-001), prepared by the U.S. Environmental Protection Agency (EPA), dated March 1997; and “Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Appendix C,” prepared the State Water Resources Control Board, dated March 27, 2000.

The SCM for this project is to incorporate, but not limited to, the following:

- a. A concise narrative discussion of the regional geologic and hydrogeologic setting. Include a list of technical references you reviewed, and copies (photocopies are sufficient) of regional geologic maps, groundwater contours, cross-sections, etc.
- b. A concise discussion of the on-site and off-site geology, hydrogeology, release history, source zone, plume development and migration, attenuation mechanisms, preferential pathways, and potential threat to down-gradient and above-ground receptors (e.g. contaminant fate and transport). Please include the contaminant volatilization from the subsurface to indoor/outdoor air exposure route (i.e. vapor pathway) in the analysis. Maximize the use of large-scaled graphics (e.g. maps, cross-sections, contour maps,

- etc.) and conceptual diagrams to illustrate key points. Include a structural contour map (top of unit) and isopach map for the aquitard that is presumed to separate your release from the deeper aquifer(s).
- c. Identification and listing of specific data gaps that require further investigation during subsequent phases of work.
 - d. Proposed activities to investigation and fill data gaps identified above (i.e. work plan).
 - e. The SCM shall include an analysis of the hydraulic flow system at down-gradient from the site. Include rose diagrams for depicting groundwater gradients. The rose diagram shall be plotted on the groundwater contour maps and updated in all future reports submitted for your site, including groundwater monitoring reports. Include an analysis of vertical hydraulic gradients. Please note that these likely change due to seasonal precipitation and groundwater pumping. To evaluate the potential interconnection between shallow and deep aquifers, include hydrographs of hydraulic head in shallow aquifer versus pumping rates from nearby water supply wells.
 - f. Temporal changes in the plume location and concentrations are also a key element of the SCM. In addition to providing a measure of the magnitude of the problem, these data are often useful to confirm details of the flow system inferred from the hydraulic head measurements. Please include plots of the contaminant plumes on your maps, cross-sections, and diagrams.
 - g. Summary tables of chemical concentrations in different media (i.e. soil, groundwater, and soil vapor), including well logs, well completion details, boring logs, etc.
 - h. Other contaminant release sites may exist in the vicinity of your site. Hydrogeologic and contaminant data from those sites may prove helpful in testing certain hypotheses for your SCM. Include a summary of work and technical findings from nearby release sites, if applicable.

At this juncture, prepare a site conceptual model (SCM) as described above, including developing and/or identifying site levels and cleanup goals, in accordance with the San Francisco Regional Water Quality Control Board Basin Plan and appropriate ESL guidance for all COCs and for the appropriate groundwater designation. Please note that soil cleanup levels should ultimately (within a reasonable timeframe) achieve water quality objectives (cleanup goals) for groundwater in accordance with San Francisco Regional Water Quality Control Board Basin Plan. Also note that according to the San Francisco Bay RWQCB's Water Quality Control Plan (Basin Plan) for the San Francisco Bay Basin, "the term 'groundwater' includes all subsurface waters, whether or not these waters meet the classic definition of an aquifer or occur within identified groundwater basins." It is also stated in the Basin Plan that "all groundwaters are considered suitable, or potentially suitable, for municipal or domestic water supply (MUN)." Therefore, the groundwater beneath the subject site must be considered beneficial for these uses unless shown to be non-beneficial using criteria presented in the Basin Plan. It is also stated in the Basin Plan that "[a]t a minimum, groundwaters designated for use as domestic or municipal supply shall not contain concentrations in excess of the secondary maximum contaminant levels (Secondary MCLs) specified in Tables 64449-A (Secondary MCLs-Consumer Acceptance Limits) and 64449-B

(Secondary MCLs-Ranges) of Section 64449 of Title 22 of the California Code of Regulations, which is incorporated by reference into this plan." Currently, concentrations of contaminants in groundwater are significantly above RWQCB's ESLs as well as the secondary MCLs. Please propose appropriate cleanup levels and cleanup goals in accordance with 23 CCR Section 2725, 2726, and 2727, and include the results of the SCM in the decision-making process. If data gaps (i.e. potential contaminant volatilization to indoor air or extent of contamination in the source area, etc.) are identified in the SCM, please include a work plan to address those data gaps.

3. **Groundwater Contaminant Plume Monitoring** – Over ten years have passed since the groundwater samples were collected and analyzed. To determine free product recovery system effectiveness and groundwater contaminant plume stability, please initiate groundwater sampling at all wells at the site. Please include analyses for TPH-d, TPH-g, BTEX, naphthalene, methyl tertiary butyl ether (MtBE) and fuel oxygenates breakdown products (i.e. ethyl tert-butyl ether (ETBE), tertamyl methyl ether (TAME), diisopropyl ether (DIPE)), lead scavengers (i.e. ethylene dichloride (EDC) and ethylene dibromide (EDB)), and alcohol compounds, (i.e. tert-butyl alcohol (TBA) and ethanol (EtOH)). At this time, please initiate consistent quarterly groundwater monitoring at the site for the above-listed analyses, and submit quarterly groundwater monitoring reports by the dates specified below. Please notify ACEH three (3) business days prior to groundwater sampling field activities.

4. **GeoTracker Non-compliance** - A review of the case file and the State Water Resources Control Board's (SWRCB) GeoTracker website indicate that the site has not been claim and electronic copies of analytical data have not been submitted, rendering the site to non-compliance status. Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. Also, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude to sub-meter accuracy using NAD 83. A California licensed surveyor may be required to perform this work. Additionally, pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3893, 3894, and 3895, beginning July 1, 2005, the successful submittal of electronic information (i.e. report in PDF format) shall replace the requirement for the submittal of a paper copy. Please claim your site in GeoTracker, complete the surveying and upload all applicable electronic submittal types such as the analytical data (EDF), survey data (GEO_XY and GEO_Z), and PDF reports from July 1, 2005 to current to GeoTracker by the date specified below. Electronic reporting is described below.

TECHNICAL REPORT REQUEST

Please submit technical reports and work plans to Alameda County Environmental Health (Attention: Paresh Khatri), according to the following schedule:

- **July 28, 2008** – Claim Site in GeoTracker and Complete all applicable Uploads

- **July 30, 2008** - Quarterly Monitoring Report (2nd Quarter 2008)
- **August 12, 2008** – Site Conceptual Model and Data Gap Work Plan
- **October 30, 2008** - Quarterly Monitoring Report (3rd Quarter 2008)
- **January 30, 2009** - Quarterly Monitoring Report (4th Quarter 2008)
- **April 30, 2009** - Quarterly Monitoring Report (1st Quarter 2009)

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.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml).

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.

If you have any questions, please call me at (510) 777-2478 or send me an electronic mail message at paresh.khatri@acgov.org.

Sincerely,



Paresh C. Khatri
Hazardous Materials Specialist



Jerry Wickham, PG, CHG, CEG
Acting Supervising Hazardous Material Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: D. Alan Nickerson, Parsons Engineering Science, Inc., 290 Elwood Davis Road, Suite 312,
Liverpool, New York, 13088
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA
94612-2032
Donna Drogos, ACEH
Paresh Khatri, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, 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

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- 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)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

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 dehloptoxic@acgov.org
 - or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
 - 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 and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - 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 dehloptoxic@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 at 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)