



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION

1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

December 7, 2015

Ms. Susan Kirkpatrick
Greyhound Lines, Inc.
c/o FirstGroup America, Inc.
600 Vine Street, Suite 1400
Cincinnati, OH 45202

Subject: Request for Corrective Action Plan Addendum; Fuel Leak Case No. RO0000074 and GeoTracker Global ID T0600100666, Oakland Bus Terminal, 2103 San Pablo Avenue, Oakland, CA 94608

Dear Ms. Kirkpatrick:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the subject site including the *Feasibility Study and Corrective Action Plan*, dated October 9, 2015, and the *Groundwater Monitoring Report*, dated October 16, 2015. The reports were prepared and submitted by Green Star Environmental on your behalf. The groundwater monitoring report documented groundwater concentrations up to 9,200 micrograms per liter ($\mu\text{g}/\text{l}$) Total Petroleum Hydrocarbons (TPH as gasoline (TPHg), 1,100 $\mu\text{g}/\text{l}$ TPH as diesel (TPHd), 650 $\mu\text{g}/\text{l}$ benzene, 220 $\mu\text{g}/\text{l}$ ethylbenzene, and 79 $\mu\text{g}/\text{l}$ naphthalene. The Feasibility Study and Corrective Action Plan (FS/CAP) briefly reviewed excavation, groundwater pumping and treatment, soil vapor extraction, and the injection of surfactant enhanced In-Situ Chemical Oxidation (ISCO) products to oxidize and remediate secondary source that is present directly beneath the former underground storage tank (UST) complex at the site. The report identified ISCO as the preferred option for corrective action at the site; however, did not provide associated costs for each as required by state UST regulations in order to determine the most cost-effective method.

To accomplish corrective actions at the site, 10 injection bores were proposed on approximately 12 foot centers inside the former UST excavation, and two injection monitoring points (wells), MP-1 and MP-2 were proposed to be installed downgradient and offsite, immediately outside and west of the former excavation area. Despite the addition of two monitoring wells / points, ACEH remains sufficiently concerned with this approach due to the injection of approximately 10,000 gallons of surfactant and reagent, and the likelihood of the mobilization of elevated concentrations of hydrocarbons from soil to groundwater, potentially including free phase hydrocarbons. Currently it is undocumented if the proposed or existing monitoring wells / points have the capability of controlling the migration of mobilized contaminants. At a minimum it appears that the radius of influence for site wells / monitoring points must be determined by a pilot test to ensure the capture of a similar or greater volume of liquid, or for subsequent potential plume control, and that storage containers will be in place for a sufficient period of time as contamination is liberated from soil, and for the subsequent storage of extracted fluids prior to disposal. Additionally, the installation of 4-inch, rather than 2-inch diameter wells may be appropriate. Due to a previous groundwater extraction system installation at the site, this data may be available; however, based on a review of reports previously provided to ACEH, the data does not appear to have been included in earlier submittals.

Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below.

TECHNICAL COMMENTS

1. **Request for CAP Addendum** – As detailed above, it appears appropriate to request the generation of a CAP Addendum in order to incorporate appropriate pilot testing of systems required to manage the migration of mobilized contaminants. Please be aware as the pilot tests are conducted, that drop-back wells may be required further downgradient to capture liberated contaminants that could bypass

the proposed monitoring points MP-1 and MP-2. The requested pilot testing may also allow an opportunity to conduct pilot tests for alternative corrective actions as judged appropriate. The CAP Addendum is also requested to incorporate associated costs for each of the methods evaluated in the FS/CAP as required by state regulation.

2. **Soil Sample Collection** – Please be aware that in order for the site to be further evaluated under the Low Threat Closure Policy (LTCP), it is appropriate to request the collection of soil samples in the 0 to 5 and the 5 to 10 foot depth intervals for all soil bores installed outside of the former UST excavation area. This will allow a comparison to the LTCP criteria for the Vapor Intrusion and for the Direct Contact and Outdoor Air Criteria. The collection of soil samples from deeper intervals will also be useful to validate the lateral and vertical delineation of contamination in soil around the former excavation, especially to the west, prior to implementation of corrective actions, and may help quantify a rate of hydrocarbon degradation beneath the site, especially near bores B-2 and B-3. The collection of soil samples as proposed in the 0 to 5 and 5 to 10 foot intervals by the previous and current dispensers, will also allow a determination of the presence of any additional remaining secondary sources at the site.
3. **Groundwater Monitoring** - Please continue to conduct semi-annual groundwater monitoring at the site. Please continue to conduct the semi-annual sampling in the months of February and August of a year, in order to capture periods of high and low groundwater levels that may elucidate the range of groundwater contaminant concentrations. Please submit the semi-annual reports by the dates identified below.

TECHNICAL REPORT REQUEST

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

- **January 22, 2016** – CAP Addendum
(File to be named: RO74_CAP_R_yyyy-mm-dd)
- **April 22, 2016** – Semi-Annual Groundwater Monitoring
File to be named: RO74_GWM_R_yyyy-mm-dd
- **October 28, 2016** – Semi-Annual Groundwater Monitoring
File to be named: RO74_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, ACEH is requesting your email address to help expedite communications and to help lower overall costs. Please provide that information in your next submittal.

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark Detterman
Senior Hazardous Materials Specialist

Ms. Susan Kirkpatrick
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Enclosures: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations &
ACEH Electronic Report Upload (ftp) Instructions

cc: Leonard Albright, Green Star Environmental, 354 McDonnell Street, Suite 9, Lewisville, TX 75057
(sent via E-mail to: LCAlbright@greenstarencironmental.com)

Terrance Harriman, Green Star Environmental, 354 McDonnell Street, Suite 9, Lewisville, TX
75057 (sent via E-mail to: TAHarriman@greenstarencironmental.com)

Brian Millman, Advanced GeoEnvironmental, Inc, 837 Shaw Road, Stockton, CA 95215
(sent via electronic mail to BMillman@advgeoenv.com)

Dilan Roe, ACEH, (sent via electronic mail to dilan.roe@acgov.org)
Mark Detterman, ACEH, (sent via electronic mail to mark.detterman@acgov.org)
Electronic file, GeoTracker

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.