

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**  
AGENCY

REBECCA GEBHART, Interim 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

July 6, 2017

Ms. Susan Kirkpatrick  
Greyhound Lines, Inc.  
c/o FirstGroup America, Inc.  
600 Vine Street, Suite 1400  
Cincinnati, OH 45202  
(Sent via electronic mail to: [Susan.Kirkpatrick@firstgroup.com](mailto:Susan.Kirkpatrick@firstgroup.com))

Subject: Conditional Work Plan Approval; 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 Department of Environmental Health (ACDEH) staff has reviewed the case file for the subject site including the *Groundwater Monitoring Report*, and the *Request for Revised Focused Site Conceptual Model and Data Gap Work Plan*, both dated May 12, 2017. The reports were prepared and submitted by Green Star Environmental (Green Star) on your behalf. Thank you for submitting them.

Due to physical limitations at the site due to the local vicinity geography and infrastructure, to satisfy the Groundwater Criteria of the Low threat Closure Policy (LTCP) the referenced work plan proposed to conduct a sensitive receptor survey, vicinity water supply well survey, and to identify likely dewatering structures which could intercept contaminated groundwater and discharge it to surface conveyances causing direct exposure to contamination or a non-point source discharges. The work plan also proposed the installation of 13 soil bores for the purpose of collecting shallow soil data within the source area represented by the former underground storage tank (UST) excavation and former dispenser islands, and laterally outside the source areas to define the lateral and vertical extent of shallow soil contamination and to obtain shallow soil analytical data to satisfy the Direct Contact and Outdoor Air Criteria of the LTCP. The work plan also proposed the installation of three semi-permanent soil vapor wells in close proximity to the existing onsite building. Due to previous soil vapor attempts which yielded limited analytical data due to tight soil conditions, the work plan proposed to use alternative Department of Toxic Substance Control (DTSC) vapor sampling protocols to collect the vapor analytical data.

Based on ACDEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org)) prior to the start of field activities.

### **TECHNICAL COMMENTS**

1. **Work Plan Modifications** – The referenced work plan proposes a series of actions with which ACDEH is in general agreement of undertaking; however, ACDEH requests several modifications to the approach. Please submit a report by the date specified below.
  - a. **Sample Selection Protocols** – The work plan proposes to collect and retain for laboratory analysis soil samples, but did not specify the soil selection protocols. To clarify ACDEH requests the samples be collected at signs of contamination (odors, discoloration, PID detections), significant changes lithology, and at the water interface. Additionally, in order to meet the requirements of the Low Threat Closure Policy (LTCP), soil samples must be collected

within the 0 to 5 foot and the 5 to 10 foot depth intervals, and at indications of contamination at deeper intervals, including potentially beneath current groundwater levels.

- b. Grab Groundwater Sampling** – Based on the proposed locations of the 13 soil bores, the collection of grab groundwater samples does not appear necessary. The locations are largely within or proximal to the extent of mapped groundwater contamination, and it does not appear the data will yield an additional understanding of the extent of the groundwater contaminant plume at the site.
  - c. Soil Vapor Protocols** – ACDEH is in general agreement with the proposed use of the alternative DTSC vapor well construction methodology; however, due to the lack of detailed vapor sampling protocols additionally requests the use of the following items, also in conformance with DTSC guidelines:

    - i. Shut-In Test** – Please ensure that a shut-in test of the sampling train has been conducted in accordance with DTSC guidelines, and is documented in the requested report.
    - ii. Vapor Shroud** – Consistent with DTSC guidelines, ACDEH requests the use of a vapor shroud with port holes low on the shroud profile to allow access to the vapor sampling train without significantly disturbing the tracer concentration in the shroud atmosphere.
    - iii. Shroud and Shroud Tracer Concentration** – To verify that the outside ambient atmosphere has not accidentally leaked into a vapor sample at greater than a 5% leak rate, the use of a tracer is appropriate in all vapor samples. Additionally, to ensure the tracer is present at a sufficient concentration in the shroud, it is necessary to determine the concentration of the tracer in the shroud atmosphere by either analytical methods or a field meter capable of accurately determining the concentration. Please additionally include this concentration, as a percentage, on tables to be generated for the requested report.
  - d. Vapor Analytical Suite** – Please additionally analyze the vapor samples for the tracer, as well as oxygen, carbon dioxide, and methane, in order to determine the extent biodegradation is occurring beneath the site. Please report these concentrations, as a percentage, on tables to be generated for the report. Please ensure that naphthalene is analyzed for with TO-17, in conformance with DTSC guidance due to the preferential absorption of naphthalene to plastic tubing (see Appendix E of the guidance).
- 2. Rose Diagram and Groundwater Monitoring** – In order to document all historic groundwater flow directions over time at the site, it appears reasonable to request the generation of a Rose Diagram to depict all historic groundwater flow directions. The Rose Diagram should be updated with each groundwater monitoring report. The diagram is anticipated to help support future site decisions under the LTCP.

Otherwise, 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.

### **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 upload technical reports to the ACDEH 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:

- **September 15, 2017** – Site Investigation Report  
File to be named: RO74\_SWI\_R\_yyyy-mm-dd
- **November 3, 2017** – Second 2017 Semi-Annual Groundwater Monitoring  
File to be named: RO74\_GWM\_R\_yyyy-mm-dd
- **May 4, 2018** – First 2018 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, ACDEH 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](mailto:mark.detterman@acgov.org).

Sincerely,



Mark Detterman  
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations & ACDEH Electronic Report Upload (ftp) Instructions

cc: Leonard Albright, Green Star Environmental, 354 McDonnell Street, Suite 9, Lewisville, TX 75057  
(Sent via electronic mail to: [LCAlbright@greenstarenvironmental.com](mailto:LCAlbright@greenstarenvironmental.com))

Terrance Harriman, Green Star Environmental, 354 McDonnell Street, Suite 9, Lewisville, TX 75057 (Sent via electronic mail to: [TAHarriman@greenstarenvironmental.com](mailto:TAHarriman@greenstarenvironmental.com))

William Little, Advanced GeoEnvironmental, Inc, 837 Shaw Road, Stockton, CA 95215  
(Sent via electronic mail to: [WLittle@advgeoenv.com](mailto:WLittle@advgeoenv.com))

Dilan Roe, ACDEH, (Sent via electronic mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))  
Paresh Khatri, ACDEH; (Sent via electronic mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org))  
Mark Detterman, ACDEH, (Sent via electronic mail to: [mark.detterman@acgov.org](mailto: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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) 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 File Transfer Protocol (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 SCP 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 ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)) for more information on these requirements.

#### 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 ACDEH's FTP server and the SWRCB's GeoTracker website." 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 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. 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 case meet this requirement. 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

Please note that delays in investigation, late 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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> December 1, 2016
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) 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](mailto: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) Open File Explorer using the Windows  key + E keyboard shortcut.
    - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
  - b) On the address bar, type in ftp://alcoftp1.acgov.org.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
  - d) Click Log On.
  - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - f) 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](mailto: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.