



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

August 30, 2012

Linda Zitner (*Sent via email to: lzitner@mills.edu*)
Mills College
5000 MacArthur Boulevard
Oakland, CA 94619

Subject: Work Plan Approval for Fuel Leak Case No. RO0000155 and Geotracker Global ID T0600100899, Mills College, 5000 MacArthur Boulevard, Oakland, CA 94619

Dear Ms. Zitner:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the most recent submittal entitled, *Work Plan* dated April 13, 2012 prepared by EquoLogic. The work plan proposes one soil boring and two vapor wells adjacent to former boring EB-2 near the Corporation Yard, two borings in Toyon Meadow and proposes a round of groundwater monitoring in all wells.

The proposed scope of work may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed.

TECHNICAL COMMENTS

- 1 **Contaminant Source Area Characterization (Corporation Yard)** – In addition to collecting samples at five foot intervals please collect and analyze samples at changes in lithology, at the soil/groundwater interface and in areas with elevated PID readings. In addition, you may want to consider collecting a sample at 16 feet bgs where the previous value of 21 ppm benzene was detected, in order to confirm this value. Please collect samples from native soil at five and ten feet below ground surface in order to determine if the Low-Threat Closure Policy (LTCP) applies to soil vapor. If you need to collect soil samples from inside the building at the Corporation Yard to obtain native soil from five and ten feet then please advance a separate boring.
- 2 **Soil Vapor Sampling** – The LTCP was implemented on August 17, 2012 and sites are being reviewed based on this policy. ACEH's review has identified that the upper five to ten feet of soil have not been sampled, leaving a determination of whether soil vapor sampling is required until after additional source area soil and groundwater data is received. Please abstain from performing the soil vapor sampling unless the results of the soil and groundwater sampling indicate soil vapor sampling is needed. Please evaluate the results of the source area samples with respect to the LTCP and provide a recommendation regarding the need for soil vapor sampling.

- 3 **Groundwater Monitoring** – In addition to your proposed analysis, please collect and analyze groundwater samples for all oxygenates and lead scavengers including: methyl tertiary butyl alcohol (MTBE), di-isopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), tert-butyl alcohol (TBA), 1, 2-dichloroethane (EDC), and ethylene dibromide (EDB).
- 4 **Permitting** – Soil boring and well installation permits are currently handled by Alameda County Public Works not Environmental Health. Public Works can be contacted at 510-567-6791 or online.
- 5 **Irrigation Well Status Information Request** – ACEH's December 20, 2011 letter also requested that an inquiry to DWR be made to determine the status of the on-site irrigation well and determine if the well has been properly destroyed. ACEH had already spoken with Mr. McBride, of Mill's College and knew that he was unaware of the aforementioned well. ACEH has also spoken to Alameda County Public Works and they also do not have any information on this well. However, an old topographic map of the area shows a well, not just a tower. Please contact DWR to request information on the status of this well and include this information in the report requested below.

NOTIFICATION OF FIELDWORK ACTIVITIES

Please schedule the fieldwork activities and provide ACEH with at least three (3) business days notification prior to conducting the fieldwork preferably by e-mail to barbara.jakub@acgov.org.

TECHNICAL REPORT REQUEST

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

- **October 29, 2012** – Soil and Water Investigation Report
File to be named SWI_R_yyyy-mm-dd

If you have any questions or concerns regarding this correspondence or your case, please call me at (510) 639-1287 or send me an electronic mail message at barbara.jakub@acgov.org.

Sincerely,

Barbara J. Jakub, P.G.
Hazardous Materials Specialist

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

cc: Lea Dooley, Equologic, Barry Lane, Monte Sereno, CA 95030 (*Sent via E-mail to: ldooley@equologicgroup.com*)

Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (*Sent via E-mail to: lgriffin@oaklandnet.com*)

Donna Drogos, ACEH (*Sent via E-mail to: donna.drogos@acgov.org*)

Barbara Jakub, ACEH (*Sent via E-mail to: barbara.jakub@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: July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 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.