



ENVIRONMENTAL HEALTH DEPARTMENT  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
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June 17, 2011

Mr. Jason Warner  
Oro Loma Sanitary District  
2600 Grant Avenue  
San Lorenzo, CA 94580  
(sent via electronic mail to [jwarner@oroloma.org](mailto:jwarner@oroloma.org))

Subject: Request for Work Plan; Fuel Leak Case No. RO0000288 (Geotracker Global ID# T0600101928), Oro Loma Sanitary District, 2600 Grant Avenue, San Lorenzo, CA

Dear Mr. Warner:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including four groundwater monitoring reports, the most recent entitled *Groundwater Monitoring Report for the Summer 2010 Semiannual Monitoring Event*, and dated August 16, 2010; each submitted on May 4, 2011. The groundwater monitoring reports were submitted on your behalf by the Trihydro Corporation (Trihydro). Thank you for submitting the reports. In general the monitoring reports document post-interim corrective action groundwater concentrations in wells MW-1 to MW-3, and MW-5 and MW-6, well MW-4 having been destroyed under permit to allow the remedial excavation. Groundwater concentrations appear to have been reduced from 30,000 to 20,000 µg/l TPHg, and 11,000 to 8,700 µg/l benzene. Toluene, ethylbenzene, and total xylenes have also undergone similar reductions, yet also remain elevated.

Additionally it does not appear the extraction system, including two extraction trenches; three recovery wells (RW-1, RW-2, RW-3); and two observation wells (OW-2 and OW-3; OW-1 does not appear to have been installed per site plans), has been utilized, despite elevated concentrations in wells MW-5 and MW-6.

Finally, a Request for Information directive letter issued by ACEH and dated August 25, 2010, remains essentially unanswered. Information was requested in five areas of concern; however, only one (Technical Comment 2) appears to have been addressed with the recent submittal of four semi-annual groundwater monitoring reports. This site is out of compliance with ACEH directives. Based on the review of the case file and the referenced report ACEH requests that you address the following technical comments and send us the documents requested below.

### **TECHNICAL COMMENTS**

1. **Overdue Items** – Information requested in the August 25, 2010 ACEH directive letter remains outstanding and submittals are overdue:
  - a. **Request for Additional Information** – Several questions were developed upon reviewing the *Report of Interim Corrective Action*, dated January 12, 2009, and prepared on your behalf by The Sutton Group, and require clarification. They include:
    - i. **Overexcavation Confirmation Sample Locations & Concentrations** – The analytical results for confirmation sampling collected at the base of the

overexcavation where included in an appendix; however, the locations were not depicted to allow an understanding of residual contamination, nor were the results tabulated. It is understood that sidewall samples were not collected to document the extent of residual contamination observed by case worker Paresh Khatri during his visit. Please clarify this, and if this is incorrect please inform ACEH of the results. Otherwise, please submit a figure that depicts all confirmation locations and tables of the analytical data as an Interim Corrective Action Report Addendum by the date identified below.

- ii. **Status Reports** – The referenced report indicates that status reports would be prepared and electronically submitted on a quarterly basis. To date only four quarterly to semi-annual groundwater monitoring reports have been submitted, and contain no extraction system data or analysis. Please clarify if these reports are the intended Status Reports. Otherwise, presuming these have been generated, please submit all status reports.
    - b. **Geotracker Well Survey** – As mapped on Geotracker the location of well MW-6 remains over 500 feet from its depicted location on report figures. Geotracker also indicates an unknown well (MW-D1) is associated with the site, again over 500 feet from the area of the site investigation. Please communicate if the later well is associated with the case and its purpose (this is presumed to be associated with the diesel ASTs [see next comment] but has not been discussed or clarified). Please correct the location data for well MW-6 (and MW-D1, if associated with the site).
    - c. **Diesel ASTs and Associated Well MW-1** – Review of the case file indicates that two 2,500-gallon diesel aboveground storage tanks (ASTs) were removed and several overexcavations occurred in the mid 1990's. The most recent correspondence found related to these ASTs was a September 26, 1996 letter from Sutton relative to the locations of two bores installed to help define the lateral limits of diesel impacted media. In question at this time is the status of well MW-1 installed to help understand the extent of diesel impacts to groundwater in the vicinity of the former ASTs. The well appears to have been last sampled in January 1996. Please communicate the status of this well.
2. **GeoTracker Compliance** - The site remains out of compliance with state GeoTracker requirements. All required uploads have not been forthcoming and include at a minimum all analytical EDFs, GEO\_WELL data, up to date GEO\_MAPs, all GEO\_BOREs, and corrected well survey uploads to GeoTracker. Please see Attachment 1 for limited additional details, and the state GeoTracker website for full details. Compliance is required by the State and is tied to reimbursement funding by the UST Cleanup Fund. Please submit all required data by the date identified below.
  3. **Request for a Work Plan** – Residual concentrations in groundwater remain elevated while a groundwater extraction system which was installed to manage the groundwater plume appears to remain unused. As a consequence, ACEH requests a work plan to manage or abate the dissolved contaminant plume, either through the activation of the extraction system, or through an alternative remedial system, by the date identified below.
  4. **Groundwater Monitoring** - The site is out of compliance with groundwater monitoring requirements. The most recent groundwater monitoring report appears to have occurred on June 30, 2010; there are no more recent reports. Well purging field notes have generally not been included in these reports, and for a bay margin site, these can be of importance. Only one of the recently submitted groundwater monitoring reports has contained limited field notes; however, field parameters on those notes are unitless, a less than useful condition. Please submit well purge notes for events that have all ready occurred, and with all future groundwater monitoring reports, including parameter units. Please note that a reduction in the number of wells and the sampling interval may be appropriate; however, requires evaluation. Please submit this evaluation by the date identified below.

5. **Groundwater Analytical Suite** – Other than MTBE, it does not appear that analysis for all fuel oxygenates has previously been conducted. If this is in error, please locate and communicate the data set(s). If this is correct, please include analysis for all fuel oxygenates and lead scavengers by EPA Method 8260 in the next regularly scheduled groundwater sampling event. Please evaluate the resulting data for appropriateness of continuing or discontinuing these in future groundwater events in following groundwater monitoring reports.

### **TECHNICAL REPORT REQUEST**

Please submit the following deliverables and technical reports to ACEH (Attention: Mark Detterman), according to the following schedule:

- **July 15, 2011** – Overdue Items - ICAP Report Addendum and Geotracker compliance
- **July 15, 2011** – Overdue Items - Correspondence (submittal of existing Status Reports, submittal of field notes for past groundwater sampling events, and status of diesel ASTs and associated well).
- **July 15, 2011** – Overdue Item – Semi-Annual Groundwater Monitoring Report (Second Semi-Annual Report for 2010)
- **August 5, 2011** – Work Plan
- **August 15, 2011** – Submittal of First Semi-Annual Groundwater Monitoring Report

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.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org).

Sincerely,

Mark E. Detterman, PG, CEG  
Senior Hazardous Materials Specialist

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

cc: David Kleesattel, Trihydro Corporation, 2520 Stanwell Drive, Suite 105, Concord, CA  
(sent via electronic mail to [dkleesattel@trihydro.com](mailto:dkleesattel@trihydro.com))

Donna Drogos, ACEH, (sent via electronic mail to [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org))

Mark Detterman, ACEH, (sent via electronic mail to [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))

Geotracker, e-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/](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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> July 20, 2010
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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](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) 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](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.