



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

October 31, 2011

LATE LETTER

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

Subject: Request for Work Plan Addendum; 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 referenced site including the *Groundwater Monitoring Report for the 2010 Second Semiannual Monitoring Event*, dated July 14, 2011 (received August 11, 2011), and the *Work Plan: Evaluation and Activation of Existing Groundwater Interceptor Trench*, dated August 5, 2011. The reports were prepared and submitted on your behalf by the Trihydro Corporation (Trihydro) of Laramie, Wyoming. Thank you for submitting the reports. Recent groundwater monitoring reports, including the most recent, 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 15,000 µg/l TPHg, and 11,000 to 3,400 µg/l benzene. Toluene, ethylbenzene, and total xylenes have also undergone similar reductions, yet also remain elevated.

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** – ACEH has received partial responses to information requested in two recent directive letters (August 25, 2010 and June 17, 2011); however, other responses and submittals remain outstanding and are overdue. This site remains out of compliance with ACEH directives. Further delays are not acceptable. ACEH requests responses to the following areas of potential concern:
 - a. **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 The Sutton Group 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.
 - b. **GeoTracker Compliance** – While some recent submittals have been uploaded to the Geotracker site, this site continues to remain 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, and all GEO_BOREs. 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.

- c. **Groundwater Monitoring** - The most recent groundwater monitoring report appears to have occurred on December 27, 2010; there are no further reports. Well purging field notes have generally not been included in recent 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.
 - d. **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 (MTBE, TBA, DIPE, ETBE, TAME, EDB, and EDC) 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.
2. **Areas of Additional Concern** – Submittal of additional information has allowed ACEH to further understand the subject site. Recent reviews of site data have yielded additional areas of concern not previously noted. These are discussed more below:
- a. **Reuse of Profile Samples SB-14 to SB-18** – The Sutton Group collected profile samples SB-14 to SB-18 to characterize excavated sand and gravel deposits for reuse as backfill of the remedial excavation. Reported analytical concentrations ranged up to 2,200 mg/kg TPHg and 9.4 mg/kg benzene. Because previously excavated sand and gravel was used as a part of the remedial excavation backfill and because the final disposition of material represented by SB-14 to SB-18 is not reported, ACEH requests clarification of the potential concern and documentation of the final disposition of the material by the date listed below.
 - b. **Use of ORC at Site** – The recent Work Plan states that the commercial product Oxygen Releasing Compound (ORC) was used in the excavation prior to backfilling. This does not appear to have been documented previously at the site; consequently AECH requests clarification and documentation of the use of the product in order to understand the extent to which it was used, and the affects of use, by the date listed below.
 - c. **Groundwater Monitored Natural Attenuation (MNA)** – Review of site documents indicate that two years of MNA would follow the remedial excavation. To date ACEH has not been provided with standard analytical results used to determine if MNA would be an appropriate remedial technique at the site; consequently ACEH requests clarification and documentation of MNA evaluation at the site by the date listed below.
3. **Evaluation of Interceptor Trench / Request for Work Plan Addendum** – The August 2011 Work Plan essentially proposes a Dual-Phase Extraction pilot test. This consists of an initial step-test of the groundwater extraction trench using pressure transducers in wells MW-5 and MW-6 to determine the effect of pumping on local groundwater followed by step-testing of the existing trench vapor recovery system, in conjunction with an identified rate of groundwater extraction. Both groundwater and vapor samples are to be collected for analysis at appropriate intervals, and a report with recommendations will follow.

In regards to the groundwater extraction portion of the test, ACEH notes that there are three apparent groundwater extraction pumps (one for each trench [Pump Wells #2 and #3], and a third at the southern corner of the remedial excavation [Pump Well #1]) and is thus confused in regards to the placement of the pump described in the work plan, if one or all locations will be step-tested, singly or in conjunction with other pump locations. ACEH also observes that two Observation Wells are located at the end of each trench segment and that the placement of transducers at these locations may be appropriate. Additionally a transducer in well MW-3 may provide useful drawdown information on the western trench segment if it is to be tested. Finally, ACEH notes that a pilot test in the two trenches (at a location approximately 35 feet from the remedial excavation) may assist in managing or controlling downgradient migration of a groundwater plume, but does not address remaining residual sources at the perimeter, at the base, or outside the extent of the remedial excavation.

In regards to the vapor extraction portion of the test, ACEH is uncertain how the limits of lateral influence of the test will be determined, or if additional vapor extraction points might be required to remediate or address residual contamination at the northern, or other, lateral extents of the remedial excavation.

For these reasons ACEH is requesting the submittal of a Work Plan Addendum to more fully address these concerns by the date identified below.

TECHNICAL REPORT REQUEST

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

- **November 30, 2011** – Overdue Items – Correspondence - Status of diesel ASTs and associated well; Geotracker Compliance; submittal of field notes for past groundwater sampling events
- **November 30, 2011** – Overdue Item – First 2011 Semi-Annual Groundwater Monitoring Report
- **December 16, 2011** – Work Plan Addendum
- **January 30, 2012** – Second 2011 Semi-Annual 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.

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, 1252 Commerce Drive, Laramie, WY 82070
(sent via electronic mail to dkleesattel@trihydro.com)
Donna Drogos, ACEH, (sent via electronic mail to donna.drogos@acgov.org)
Mark Detterman, ACEH, (sent via electronic mail to 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/).

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.