



November 30, 2016

Mr. Sorbor Twegbe
Oakland Unified School District
955 High Street
Oakland, CA 94601
(Sent via electronic mail to: Sorbor.Twegbe@ousd.org)

Subject: Conditional Work Plan Approval; Fuel Leak Case No. RO0000292; (Global ID # T0600102065); City of Oakland McClymond High School, 2607 Myrtle Street, Oakland, CA 94607

Dear Mr. Twegbe:

Alameda County Environmental Health (ACDEH) has reviewed the *Data Gap Investigation Workplan and Focused Site Conceptual Model*, dated October 6, 2016 (received October 25, 2016). The work plan was prepared and submitted on your behalf by TEC Environmental Inc. (TEC). Thank you for submitting the work plan.

The work plan proposed the installation of three groundwater monitoring wells in the presumed downgradient direction in an effort to define the lateral and downgradient extent of soil and groundwater contamination from the release. Soil samples to be collected in the process are expected to help the site determine if it will meet the Direct Contact and Outdoor Air Exposure scenario of the State Water Board's Low Threat Closure Policy (LTCP).

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) 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 proposed scope of work. Please submit a report by the date specified below.
 - a. **Well Relocation** – Review of the subject site and vicinity on a topographic map indicates that the local land slope is to the southwest. In general, groundwater flow typically follows topography. It therefore appears reasonable to request the relocation of well MW-2 such that it is located to the southwest of MW-1, rather than to the northwest of MW-1. Due to the limited area between swim center buildings and the tennis courts, this may additionally require a slight relocation of MW-3 in order to produce a sufficient well spread for triangulation and a determination of the direction of groundwater flow.
 - b. **Well Construction** – The work plan proposes to install 4-inch diameter wells, rather than the typical 2-inch diameter wells. If there is an un-communicated consideration for the removal of Light Non-Aqueous Phased Liquids (LNAPL), this may be appropriate. Otherwise, it may be appropriate to use 2-inch diameter wells.

Additionally, ACDEH requests the well screen be roughly centered on the depth of first encountered groundwater, rather than only two to three feet above first groundwater.

This will accommodate rises in groundwater that can induce concerns about submerged well screen intervals, which can require additional investigation to resolve.

- c. Soil Sample Selection** – The work plan proposes to collect one soil sample from each of the proposed wells. In order to define the site within the LTCP, multiple soil samples are required at a site within the 0 to 5 foot, and the 5 to 10 foot depth intervals. This is consistent with ACDEH requirements for the collection of multiple soil samples in each soil bore at signs of contamination, such as staining, Photoionization Detector (PID) readings, odor, or other evidence of contamination in these depth intervals, at significant changes in lithology, as well as just above first encountered groundwater. The intent of this requirement is to define any contamination at a site quickly and to identify any remaining elements of concern, rather than to remobilize to the site in order to obtain sufficient information within the context of the Policy. The LTCP continues to require that environmental contamination at a site be defined laterally and vertically.

Well Bore Logs – Please ensure bore logs included in the requested report include PID readings, Unified Soils Classification System (USCS) soil descriptions, including soil colors, the depth of first encountered and stabilized groundwater, and well construction details.

- d. Interface Probe** – The use of an interface probe was not discussed in reporting the lack of LNAPL in the tank pit backfill well, and the presence of 5,190 micrograms per liter ($\mu\text{g/l}$) of Total Petroleum Hydrocarbons as diesel (TPHd). Technical justification papers of the LTCP indicate that concentrations of TPHd in excess of 5,000 $\mu\text{g/l}$ constitute indirect evidence for the presence of LNAPL in soil or groundwater in the vicinity of the sample. Therefore, groundwater sampling, especially at this well, is requested to include the use of an interface probe to determine the presence or absence of LNAPL.

- e. Well Survey** – While ACDEH recognizes this comment may be due to a typographical error, please ensure the well survey standard is suitable for uploading to the state Geotracker website. Vertical datums supported by Geotracker include NGVD29 and NAVD88, but not NGVD88.

- 2. Groundwater Monitoring** – Please initiate quarterly groundwater monitoring of the wells, including the tank backfill well, for an estimated one year period of length. While ACDEH anticipates that the sampling interval can be modified based on initial results, please include the results of the initial groundwater monitoring event in the requested site investigation report requested above, and subsequent quarterly groundwater monitoring reports by the dates identified below.

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 Attachment 1 and the specified file naming convention below, according to the following schedule:

- **February 17, 2017** - Soil and Groundwater Investigation Report
File to be named: RO292_SWI_R_YYYY-mm-dd
- **June 16, 2017** – Quarterly Groundwater Monitoring Report
File to be named: RO292_GWM_R_YYYY-mm-dd
- **September 15, 2017** – Quarterly Groundwater Monitoring Report
File to be named: RO292_GWM_R_YYYY-mm-dd

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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 does not appear on the cover page of this notification, ACDEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

If you have any questions, please call 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 and
Electronic Report Upload (ftp) Instructions

cc: James Hanlon, TEC Environmental, Inc, 262 Michelle Court, So. San Francisco, CA 94080,
(Sent via electronic mail to: jhanlon@tecaccutite.com)

Dilan Roe, ACDEH, (Sent via electronic mail to: dilan.roe@acgov.org)

Paresh Khatri, ACDEH; (Sent via electronic mail to: paresh.khatri@acgov.org)

Mark Detterman, ACDEH, (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.