

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
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

October 4, 2017

City of Oakland Public Works
Attn.: Mark Arniola
250 Frank H. Ogawa Plaza, Suite 4314
Oakland, CA 94612
(Sent via electronic mail to marniola@oaklandnet.com)

Subject: Conditional Work Plan Approval; Fuel Leak Case No. RO0000293 and GeoTracker Global ID T0600100375, City of Oakland Municipal Service Center, 7101 Edgewater Drive, Oakland, CA 94612

Dear Mr. Arniola:

Thank you for the recent submittal of the document entitled *Additional Investigation Work Plan (Work Plan)*, dated September 8, 2017 and prepared by Terraphase Engineering Inc. (Terraphase) for the subject case. Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the aforementioned document. The Work Plan was prepared at the request of ACDEH in our meeting with you and Kayleigh Lim of the City of Oakland, Diane Heinze of the Port of Oakland, and Andrew Romolo and Anna Behrens of Terraphase on May 31, 2017 and in our letter of the same date.

In our letter of May 31, 2017, ACDEH requested the following items:

- A.** Electronic submittal of information;
- B.** Groundwater monitoring; and
- C.** Work plan submittals in a phased approach for:
 - i. Soil vapor and groundwater investigation;
 - ii. Membrane interface probe (MIP) - ultra-violet optical screening tool (UVOST) investigation; and
 - iii. Soil and groundwater investigation.

Numerous recent submittals, including GEO_BORE, EDF, and GEO_WELL files, have been submitted to State Water Resources Control Board (SWRCB) GeoTracker website, addressing item A. Terraphase addressed item C(i) in a previously submitted work plan dated June 15, 2017 and approved by our agency on July 19, 2017.

As presented in the Work Plan, Terraphase proposes to address item C(ii) with the advancement of 17 soil bores with the use of either direct push (DP) or cone penetrometer testing (CPT) methodologies equipped with an MIP sensor. Following a review of the MIP data, Terraphase proposes to advance 13 CPT bores equipped with a UVOST sensor. Though tentatively depicted on Figure 6 of the Work Plan, Terraphase states the UVOST boring locations will be based on the findings of the MIP phase of the investigation. Additionally, Terraphase outlines a continued groundwater sampling program to address item B.

As presented in Work Plan Table 1, Terraphase proposes the collection of grab groundwater (GGW) samples at the MIP bore locations. Analysis of the GGW samples consists of total petroleum hydrocarbons (TPH) as gasoline (TPHg), benzene, toluene, ethylbenzene, and xylenes (collectively BTEX) and methyl tertiary butyl ether (MTBE) by EPA Test Method 8260 and TPH as diesel (TPHd) and as motor oil (TPHmo) by EPA Test Method 8015. No soil sampling is proposed.

ACDEH generally concurs with the proposed scope of work for the MIP phase of the investigation and requests that you address the following technical comments, perform the proposed work, and send us the technical reports described below.

TECHNICAL COMMENTS

- 1. Analysis Scope** – The SWRCB Low Threat Underground Storage Tank Case Closure Policy (LTCP) includes naphthalene as a chemical of potential concern (CPOC) at fuel release sites. Historically, naphthalene has been reported at concentrations of up to 220 micrograms per liter ($\mu\text{g/L}$) in groundwater at the site. ACDEH requests the addition of naphthalene to the scope of analysis. Note that naphthalene may be reported by the EPA Test Method 8260 analysis; hence, its reporting would not be expected to significantly increase the analysis cost.
- 2. MIP Bore Locations** – Based on ACDEH's review of the proposed MIP bore locations, we recommend an additional MIP bore. The location of the bore would be to provide data in the gap between the proposed locations of MIP-10 and MIP-14. Please add the additional bore, or alternatively, please provide ACDEH, by the date specified below, with the rationale why the bore is not needed.
- 3. UVOST Bore Locations** – Please provide ACDEH with a summary of the results of the MIP investigation, including a summary data table of the GGW results, for our review and discussion, prior to implementing the UVOST investigation phase by the date specified below. ACDEH requests a figure which depicts the proposed UVOST locations accompany the data summary. Following our review and approval, the UVOST phase of the investigation may proceed.
- 4. UVOST Soil Sampling** – ACDEH is of the opinion soil sampling conducted in association with the UVOST phase of the investigation may aid in qualifying residual and free-phase product concentrations. Qualitative and quantitative identification of residual and free-phase product would aid in evaluating the source area as a potential, continuing source of groundwater contamination. Therefore, ACDEH requests recovery of soil samples in the zones of residual and free-phase product identified by the UVOST.
- 5. Confirmation Groundwater Sampling** – Section 3.6- Sampling Methodology- states the “final phase of the proposed investigation will be collection of grab groundwater confirmation samples, following a review of all MIP and UVOST data”. ACDEH requests an opportunity to discuss the proposed locations of the GGW confirmation sampling based on the collected MIP and UVOST data. Therefore, ACDEH requests a summary table of the MIP and UVOST data and a figure which depicts the proposed confirmation sampling locations by the date specified below. The GGW confirmation sampling phase of the investigation may be implemented following our data review and approval.
- 6. Investigation Derived Waste** – Terraphase states the wastes generated during the investigation will be profiled for Title 22 metals, TPHg, TPHd, and TPHmo, and BTEX and MTBE compounds. ACDEH requests the waste receiving facility(ies) be contacted to confirm the scope of analysis required by the receiving facility(ies) for waste acceptance.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH FTP site (Attention: Keith Nowell), and to the SWRCBs GeoTracker website, in accordance with the following specified file naming convention and schedule:

- **October 18, 2017** – Comment on the Additional MIP Bore (between MP-10 and MP-14) (provided to ACDEH, Attention Keith Nowell, via electronic mail)
- **30 days following collection of the MIP data** – UVOST Bore Locations – MIP Data Summary Table and Figure (provided to ACDEH, Attention Keith Nowell, via electronic mail)
- **30 days following collection of the UVOST data** – Groundwater Confirmation Sampling Locations – Data Summary Table and Figure (provided to ACDEH, Attention Keith Nowell, via electronic mail)
- **February 2018** – Meeting to discuss the findings of the current investigation.
- **March 30, 2018** – Contaminant Plume Delineation Report (File to be named: RO0000293_SWI_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>.

Thank you for your cooperation. ACDEH looks forward to working with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Sincerely,

Keith Nowell PG, CHG
Hazardous Materials Specialist

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

cc: Kayleigh Lim, Environmental Program Specialist, Oakland Public Works, 250 Frank Ogawa Plaza, Suite 5301, Oakland CA 94612 (*Sent via electronic mail to: klim@oaklandnet.com*)

Andrew Romolo, Terraphase Engineering Inc., 1404 Franklin Street, Suite 600, Oakland, California 94612 (*Sent via electronic mail to: andrew.romolo@terrphase.com*)

Diane Heinze, Port of Oakland, 530 Water Street, Oakland, CA 94604-2064 (*Sent via electronic mail to: dheinze@portoakland.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*)

Keith Nowell, ACDEH (*Sent via electronic mail to: keith.nowell@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

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/) 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.

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| Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) | REVISION DATE: December 1, 2016 |
| | ISSUE DATE: July 5, 2005 |
| | PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016 |
| SECTION: Miscellaneous Administrative Topics & Procedures | SUBJECT: 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 acknowledgement 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) 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 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.