

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

COLLEEN CHAWLA, Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
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August 1, 2018

Mr. Seung Lee
German Autocraft
301 East 14th Street
San Leandro, CA 94577

William Andrade II
Address Unknown

Sephen & Elizabeth Wilhelm
Address Unknown

Subject: Post JET Call Corrective Action Implementation Plan Request; Fuel Leak Case No. RO0000302 and Geotracker Global ID T0600100639, German Autocraft, 301 East 14th Street, San Leandro, CA 94577-1713

Dear Responsible Parties:

Thank you for participating in a Joint Execution Team (JET) conference call on July 27, 2018 with the State Water Resource Control Board (SWB) and Alameda County Department of Environmental Health (ACDEH) staff to discuss the site. The JET works under the Expedited Claim Account Program (ECAP) of the SWB. The conference call is part of a series of meetings held by stakeholders to determine and expedite a path to closure for the petroleum hydrocarbon contamination at the site. A path forward appears to have been identified in the call.

Based on the discussion in the meeting ACDEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

1. **Corrective Action Implementation Plan (CAIP)** – The JET is in general agreement that the proposed ozone injection wells may be effective in remediating onsite groundwater contamination and in overtime reducing groundwater concentrations downgradient of the site. The intent is to be protective of the ability to install wells and utilize groundwater in the downgradient direction of the site due to the documentation of one, and likely several more private water supply irrigation wells, in that region.

As discussed in the call, ACDEH requests a CAIP that is focused on the selection of ozone injection, but that includes the additional potential corrective action “tools” in the event the ozone injection wells are eventually not found effective in remediating residual soil contamination. Because corrective actions require a public comment period, the intent is to include other potentially viable corrective actions in the CAIP to preclude an additional public comment period for corrective actions not included in the CAIP.

ACDEH requests that the CAIP briefly identify appropriate pilot testing for alternative potentially viable corrective action methods at the site. Also, due to the change in groundwater gradient direction, as documented by the historic contaminant plume path towards the 141 Farrelly well, and the current westward directed groundwater flow direction, please also be aware that the extent of the plume downgradient of well MW-12 has not been defined. In the requested CAIP, please present implementation details including:

- Design drawings and specifications for the ozone injection system including installation details for the wells originally proposed in the pilot study
- Operation and maintenance plans
- System optimization, performance metrics and proposed reporting including submittal of monthly progress reports

- Post-remediation monitoring and verification plans with proposed strategy for collecting groundwater or other appropriate confirmation samples.
- An updated detailed cost estimate for the proposed work
- Updated cleanup goals utilizing the LTCP screening levels for petroleum hydrocarbons
- Implementation schedule with milestone dates

Please note, implementation of corrective actions is contingent on submittal and ACDEH acceptance of the CAIP.

- 2. Fact Sheet** - Public participation is a requirement for the corrective action process. Thank you for previously providing a draft copy of a fact sheet. Upon ACDEH receipt of the CAIP, affected members of the public who live or own property in the surrounding area will to be notified. Public comments on proposed corrective actions is for a 30-day period.
- 3. Semi-Annual Groundwater Monitoring** – In order to capture potential worst-case contaminant concentrations, the January 2, 2018 directive letter requested semi-annual sampling during the months of May and November (Second and Fourth Quarters) of a year. However, to align groundwater monitoring and sampling with the corrective action implementation period as identified in the JET meeting, ACDEH modifies this request for groundwater monitoring and sampling during the First and Third Quarters of a year.
- 4. 141 Farrelly Drive Well** – As discussed in the JET conference call, it appears that additional groundwater monitoring and sampling of this private water supply well can be eliminated due to an approximately 22 year record of non-detectable concentrations at standard limits of reporting, the stopping of the release, and the documentation of a stable groundwater plume downgradient of the site.
- 5. Sensitive Receptor Survey; Water Supply Well Survey** – An additional outcome of the JET meeting was an renewed effort to conduct a door to door search to identify additional potential sensitive receptors, in particular private water supply wells, downgradient and west of the subject site.

As you are aware, the Groundwater Media-Specific of the Low Threat Closure Policy (LTCP) is concerned with water supply wells and surface water bodies within 1,000 feet of the defined extent of the groundwater plume. As previously noted the groundwater plume for Total Petroleum Hydrocarbons as gasoline (TPHg) downgradient of well MW-12 has not been defined. In order to define an area to search, the length of standard groundwater plumes as identified in the *Technical Justification for Groundwater Media-Specific Criteria* (SWB, April 2012), can be utilized, with a 1,000 foot buffer zone in order to incorporate constraints of the LTCP. Please submit a sensitive receptor survey by the date identified below.

TECHNICAL REPORT REQUEST

Please submit the following technical reports and deliverables to the State Water Board's Geotracker website and notify your case worker by electronic mail (mark.detterman@acgov.org), in accordance with the following specified file naming convention and schedule, as provided below, and in the Responsible Party(ies) Legal Requirements/Obligations which is included as Attachment 1. Please note ACDEH no longer accepts reports on the ftp site.

- **October 1, 2018** – Corrective Action Implementation Plan
File to be named: RO302_CAIP_R_yyyy-mm-dd
- **November 16, 2018** – Sensitive Receptor Survey
File to be named: RO302_COND_WELL_R_yyyy-mm-dd

- **November 16, 2018** – Third Quarter 2018 Semi-Annual Groundwater Monitoring Report
File to be named: RO302_GWM_R_YYYY-MM-DD
- **April 26, 2019** – First Quarter 2019 Semi-Annual Groundwater Monitoring Report
File to be named: RO302_GWM_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>. 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.

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: Gowri Kowtha, Stratus Environmental, Inc, 3330 Cameron Park Drive, Suite 550, Cameron Park, CA 95682; (Sent via electronic mail to: gkowtha@stratusinc.net)

Scott Bittinger, Stratus Environmental, Inc, 3330 Cameron Park Drive, Suite 550, Cameron Park, CA 95682; (Sent via electronic mail to: sbittinger@stratusinc.net)

Scott Lookingbill, State Water Resource Control Board; 1001 I Street, Sacramento, CA 95814; (Sent via electronic mail to: Scott.Lookingbill@waterboards.ca.gov)

Caryl Sheehan, State Water Resource Control Board; 1001 I Street, Sacramento, CA 95814; (Sent via electronic mail to: Caryl.Sheehand@waterboards.ca.gov)

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

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

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 the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

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 and include the professional registration stamp, signature, and statement of professional certification. 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

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.