



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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March 10, 2009

Julie Straub
United Parcel Service
55 Glenlake Parkway, NE
Atlanta, GA 30328-3474

Subject: Fuel Leak Case No. RO0000315 and Geotracker Global ID T0600100939, United Parcel Service, 8400 Pardee Dr., Oakland, CA 94621

Dear Ms. Julie Straub:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the most recently submitted *Year 2008 Second Semi-Annual Groundwater Monitoring & Sampling Report* dated December 15, 2008 which was submitted by Arcadis. The groundwater monitoring report indicates that up to 0.04 feet of separate phase hydrocarbons (SPH) exist in two of the wells with total petroleum hydrocarbons as diesel (TPHd) at a concentration of 180,000 micrograms per liter ($\mu\text{g/L}$) and TPH as gasoline (TPHg) at a concentration of 340 $\mu\text{g/L}$ in well OW-1. Previous chromatograms of the SPH indicate that it is weathered diesel.

ACEH has reviewed the case and has determined that additional work is needed to progress toward closure. ACEH requests that you perform the work requested below, address the following technical comments, and submit the report requested below.

TECHNICAL COMMENTS

1. **Free Product Removal** – Separate phase hydrocarbons are still present in OW-1 despite remediation via oxygen release compound (ORC) and current monthly product bailing. Monthly product bailing began circa 2003. No tables have been presented with the volume of SPH removed even though the field notes contain the volume of product removed in milliliters. Please tabularize the data to demonstrate how much product has been removed, evaluate whether this removal method is effective against other more active methods to remove the remaining product and develop a plan to complete free product removal. Present your plan in the report requested below.
2. **Vertical Delineation of Source Area Soil and Water** – Depth discrete sampling is needed for vertical characterization of both soil and groundwater in the source area. Please evaluate this data gap in the report requested below.
3. **Site Conceptual Model** – Your reports suggest that the contamination in the wells may be from fill materials placed on the site and that there is no transport mechanism that accounts

for migration of SPH from the fueling area to TW-8. No data is presented to support or refute this hypothesis.

At this juncture, it may be advantageous to develop a site conceptual model (SCM), which synthesizes all the analytical data and evaluates all potential exposure pathways and potential receptors that may exist at the site, including identifying or developing site cleanup objectives and goals. At a minimum, the SCM should include:

- (1) Local and regional plan view maps placed on a base map which shows an aerial photograph that illustrates the location of sources (former facilities, piping, tanks, etc.) extent of contamination, direction and rate of groundwater flow, potential preferential pathways, and locations of receptors;
- (2) Geologic cross section maps that illustrate subsurface features, man-made conduits, and lateral and vertical extent of contamination;
- (3) Regional and local geology and hydrogeology;
- (4) Plots of chemical concentrations versus time;
- (5) Plots of chemical concentrations versus distance from the source;
- (6) Summary tables of chemical concentrations in different media (i.e. soil, groundwater, and soil vapor); and
- (7) Well logs, boring logs, and well survey maps;
- (8) Discussion of likely contaminant fate and transport.

If data gaps (i.e. potential contaminant volatilization to indoor air or contaminant migration along preferential pathways, etc.) are identified in the SCM, please include a proposed scope of work to address those data gaps in the work plan due by the date specified below. Please note that the work plan must address all technical comments presented in our December 11, 2006 correspondence and all data gaps identified in the SCM.

4. **Preferential Pathway Study** – ACEH files do not contain a preferential pathway study. Since high dissolved concentrations and SPH is present at the site, please conduct a preferential pathway study. The purpose of the preferential pathway study is to locate potential migration pathways and conduits and determine the probability of the SPH and/or the plume encountering preferential pathways and conduits that could spread contamination. We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for vertical and lateral migration that may be present in the vicinity of the site.

Discuss your analysis and interpretation of the results of the preferential pathway study (including the well survey and utility survey requested below) and report your results in the Soil and Water Investigation (SWI) requested below. The results of your study shall contain all information required by California Code of Regulations, Title 23, Division 3, Chapter 16, §2654(b).

a. **Utility Survey**

An evaluation of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s) is required as part of your study. Please include maps and cross-sections illustrating the location and depth of all utility lines and trenches within and near the site and plume areas(s) as part of your study.

b. Well Survey

The preferential pathway study includes a well survey of all wells (monitoring and production wells: active, inactive, standby, decommissioned (sealed with concrete), abandoned (improperly decommissioned or lost); and dewatering, drainage, and cathodic protection wells) within a 1,000 foot radius of the subject site.

5. **Groundwater Monitoring** – Analysis has been performed for TPHd and TPHg, benzene toluene, ethylbenzene, xylenes (BTEX) and methyl tertiary butyl ether (MTBE). Since at least March of 2007, no BTEX or MTBE have been detected in any of the four site wells. At this time, please discontinue analysis for BTEX and MTBE in your next semi-annual monitoring event but perform a one-time sample event for the lead scavengers ethylene dibromide (EDB) and ethylene dichloride (EDC) by EPA Method 8260. Please ensure that naphthalene analysis is performed in areas of concern that formerly utilized diesel. Also, please analyze for total dissolved solids on a one-time basis.
6. **Uploading to ACEH FTP Site** – In addition to uploading reports to Geotracker, ACEH requires a pdf of the reports to be uploaded to our FTP site as described below in the section titled Electronic submittal of reports. We have yet to receive pdfs of the 2008 first and second semi-annual monitoring event. Please discontinue submission of reports in hard copy format as ACEH accepts only electronic submission of reports.
7. **Base Map** – Please use aerial photographs as your base map, as described above, in all future reports for this site.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Barbara Jakub), according to the following schedule:

- **April 27, 2009** – SCM with Preferential Pathway Evaluation

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.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml).

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.

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If you have any questions, please call me at (510) 639-1287 or send me an electronic mail message at barbara.jakub@acgov.org.

Sincerely,



Barbara J. Jakub, P.G.
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Hugh Devery, Arcadis, 975 Cobb Place Blvd. NW, Suite 311, Kennesaw GA, 30144
Mr. Douglas Hermann, Port of Oakland, 530 Water St., Oakland, CA 94607
Mr. Mark Gomez, City of Oakland, 250 Frank Ogawa Plaza, Ste. #5301, Oakland, CA 94612
Donna Drogos, ACEH
Barbara Jakub, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, 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

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- 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)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

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 dehloptoxic@acgov.org
 - or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
 - 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 and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - 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 dehloptoxic@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 at 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)