



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

July 28, 2015

Mr. Paul Harper
United Parcel Service
55 Glenlake Parkway, NE
Atlanta, GA 30328-3474
(Sent via E-mail to: pharper@ups.com)

Mr. Douglas Hermann
Port of Oakland
530 Water St.
Oakland, CA 94607
(Sent via E-mail to: dherman@portoakland.com)

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

Dear Mr. Harper and Mr. Herman:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the recently submitted *Expanded Work Plan for Free Product Delineation* (Work Plan), dated July 21, 2015, which was prepared by Arcadis U.S., Inc. (Arcadis) for the subject site. The Work Plan addresses ACEH's comments in our correspondence dated July 14, 2015. The Work Plan proposes to advance a minimum of 17 soil borings to delineate the extent of free phase product at the site at five areas known and suspected of containing free phase product. Thirteen of the borings will be converted into groundwater monitoring wells.

Soil samples will be collected from 10 of the soil bores for laboratory analysis based on obvious signs of impacts, such as elevated PID readings, visual staining, lithology and/or grain size change; at the soil/groundwater interface; and to comply with the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) Media Specific Criteria for Direct Contact and Outdoor Air Exposure which specifies collecting soil samples from two different depths in the 0- to 5-ft zone, as measured from land surface, and from within the 5- to 10-ft zone.

ARCADIS will evaluate methane concentrations by collecting well air samples from monitoring ports installed in monitoring wells and connected to a personal air sampling pump or syringe. A multi-gas meter with a carbon filter will be used for methane monitoring.

Based on ACEH staff review of the referenced documents and of the case file we generally concur with the recently proposed scope of work, provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. We request that you address the following technical comments, submit the requested document, and upon ACEH approval, perform the proposed work, and send us the technical reports requested below. Please provide 72-hour advance written notification to this office (e-mail preferred to: keith.nowell@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Grab Groundwater Sampling** – Please collect grab groundwater samples from the soil bores not converted to monitoring wells. Please submit the grab groundwater samples for laboratory analysis. The scope of analysis should be consistent with the analysis scope outlined in the Work Plan for soil analysis.
2. **Well Screen Exposure** – The Work Plan states wells used for methane monitoring will have depth to water measured to ensure that at least one foot of well screen is exposed prior to collecting the methane sample, and that

initial and stabilized concentrations will be recorded. Please ensure an adequate number of samples will be collected to determine when measurements have stabilized.

3. **Methane Monitoring** – Since carbon filters cannot remove all hydrocarbon interferences, direct soil gas sampling for methane is warranted if concentrations in the monitoring wells exceeds 20% lower explosive limit (LEL) or 1% methane by volume.
4. **Well Sampling** – The thirteen new wells are required to be sampled on a quarterly basis for a period of one year. Please coordinate the sampling so the monitoring events can be incorporated in to the current semi-annual groundwater monitoring events.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Keith Nowell), according to Attachment 1 and the following naming convention and schedule:

- **October 12, 2015** – Soil and Water Investigation (File to be named: SWI_R_YYYY-mm-dd)
- **December 28, 2015** – Quarterly Groundwater Monitoring Report (File to be named: GWM_R_YYYY-mm-dd)
- **March 25, 2016** – Semi-annual Groundwater Monitoring Report (File to be named: GWM_R_YYYY-mm-dd)
- **June 24, 2016** – Quarterly Groundwater Monitoring Report (File to be named: GWM_R_YYYY-mm-dd)
- **September 23, 2016** – Semi-annual Groundwater Monitoring Report (File to be named: 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.

If you have any questions, please call me at (510) 567-6764 or send me 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: Jennifer Halcomb-LeBeau, Arcadis U.S., Inc., 1000 Cobb Place Blvd., Bldg. 500-A, S Kennesaw, GA 30144 (Sent via E-mail to: Jennifer.LeBeau@arcadis-us.com)

Dilan Roe, ACEH (Sent via E-mail to: dilan.roe@acgov.org)
Keith Nowell, ACEH (Sent via E-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

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.