



May 24, 2017

Mr. Chris Hawk
Penske Truck Leasing
10 Green Hills, P.O. Box 7635
Reading, PA 19603-7635 (Sent via e-mail to: Christopher.Hawk@penske.com)

Subject: Fuel Leak Case RO354 - Hertz-Penske, Geotracker Global ID TO600101062, 725 Julie Ann Way, Oakland, CA 94621

Hello Chris:

Thank you for submitting to Alameda County Department of Environmental Health (ACDEH) the December 1, 2016 *Scoping Ecological Risk Assessment*, prepared and submitted by Stantec on your behalf. As described in the June 10, 2016 Directive Letter, total petroleum hydrocarbons (TPH) as gasoline was detected at concentrations of 1,700 and 890 micrograms per liter (ug/l) in grab groundwater samples SB-12 and SB-13, respectively and TPH as diesel (TPHd) was detected at concentrations of 3,600 and 2,170 ug/l in groundwater samples collected from new monitoring wells MW-10 and MW-12, respectively. The TPHg concentrations exceed the updated San Francisco Bay Regional Water Quality Control Board's lower aquatic habitat Environmental Screening Levels (ESLs) Version 3 (published in February 2016) of 440 ug/L for TPHg and 640 ug/L for TPHd. The borings and monitoring wells from which these samples were collected are located within approximately 10 feet of the top of the eastern bank of an Alameda County Flood Control drainage channel which flows to Seminary Creek and the San Francisco Bay. Given the close proximity of the monitoring well and boring locations to the earthen drainage ditch bank, there is a reasonable potential for direct-exposure of aquatic biota to the elevated TPHd and TPHg concentrations. Based on ACDEH staff review of the case file and the referenced report ACDEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

1. **Request for Third Party Review of Risk Assessment:** ACDEH's staff does not include a toxicologist. Consequently, as mentioned in our June 10, 2016 Directive Letter, we request that you submit the *Scoping Ecological Risk Assessment* to one of the ACDEH-approved third party reviewers for review. Please submit correspondence prepared by one of the two ecological risk assessors summarizing the findings of their review of the *Scoping Ecological Risk Assessment* by the date requested below. The two following ecological risk assessors were recommended to ACDEH by Ms. Ute Hellmann-Blumberg of the California Department of Toxic Substances Control (DTSC).
 - a. Usha Vedagiri, AECOM, Oakland, CA, Phone 510-874-3123 E-mail: usha.vedagiri@aecom.com
 - b. Mala Pattanayek, Integral Corporation, Petaluma, CA, Phone: 415-393-4750 E-mail: mpattanayek@integral-corp.com
2. **Request for Groundwater Monitoring Well Monitoring and Sampling:** The wet winter 2016-2017 in the San Francisco Bay Area affected groundwater elevations and groundwater quality at most if not all cases. ACDEH requests that you monitor and sample all site groundwater monitoring wells and provide a *Groundwater Monitoring and Sampling Report* by the date requested below.

3. **Electronic Submittal of Information (ESI) Compliance** - A review of the case file and the State's GeoTracker database indicates that the site is not in compliance with California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, stating that beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs, including the Site Cleanup Program (SCP) cases. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites was required in GeoTracker. At present missing data and documents include, but may not be limited to:
- analytical data for soil, water and vapor samples collected for the purpose of subsurface investigation or remediation, including influent/effluent water samples from remediation systems (EDF files);
 - complete copies of reports, in pdf format, including the signed transmittal letter and professional certification (GEO_REPORT files);
 - surveyed elevation measurements to the top of well casings (GEO_Z files);
 - the latitude and longitude (GEO_XY files) of any permanent monitoring well for which data is reported in EDF format;
 - depth-to-water information for permanent sampling points whenever the data is collected, even if the well is not sampled during the sampling event (GEO_WELL files);
 - stand alone site maps displaying tank locations, streets bordering the facility, and sampling locations for all soil, water and vapor samples (GEO_MAP files);
 - stand alone boring logs with depth to the screened interval and the length of screened interval for any permanent monitoring well installed (GEO_BORE files);
 - Please upload the missing documents and soil and groundwater analytical data to GeoTracker. See Attachment 1 and the State's GeoTracker website for further details. ACDEH requests e-mail notification of, and a list of, the documents uploaded to Geotracker. Please upload all submittals to GeoTracker and to ACDEH's ftp website by the date specified below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **June 30, 2017 – Groundwater Monitoring and Sampling Report**
File to be named: RO354_GWM_R_yyyy-mm-dd
- **June 30, 2017 – Notification of Upload of Electronic Data Submittals to Geotracker**
E-mail notification to: karel.detterman@acgov.org
- **July 28, 2017 – Correspondence Documenting Findings of the Third Party Review of the *Scoping Ecological Risk Assessment***
File to be named: RO354_CORRES_L_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/lop/ust.htm>

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

Please note that ACDEH has updated Attachment 1 regarding report submittals to ACDEH. ACDEH will now require a Submittal Acknowledgement Statement, replacing the Perjury Statement, as a cover letter signed by the Responsible Party. The language for the Submittal Acknowledgement Statement is as follows:

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. Please make this change to your submittals to ACDEH.

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please send me an e-mail message at karel.detterman@acgov.org or call me at (510) 567- 6708.

Sincerely,

Karel Detterman, PG
Hazardous Materials Specialist

Enclosures: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations ACEH Electronic Report Upload (ftp) Instructions

cc: Eva Hey, Stantec Consulting Services, Inc., 1340 Treat Boulevard, Suite 300 Walnut Creek, CA 94597-7966 (Sent via E-mail to: eva.hey@stantec.com)
Neil Doran, P.G., Stantec, (Sent via E-mail to: neil.doran@stantec.com)
Linda Mortensen, Stantec, (Sent via E-mail to: linda.mortensen@stantec.com)
Patrick Vaughan, Stantec, (Sent via E-mail to: patrick.vaughan@stantec.com)

Dilan Roe, ACEH (Sent via E-mail to: dilan.roe@acgov.org)
Karel Detterman, ACEH (Sent via E-mail to: karel.detterman@acgov.org)
Paresh Khatri, ACDEH, (Sent via E-mail to: paresh.khatri@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

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.

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 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.