



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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November 15, 2012

Megan Lambert  
Volkswagen Group of America (CBRE)  
3800 Hamlin Rd.  
Auburn Hills, MI 48326  
(Sent via E-mail to:  
[megan.lambert@cbre.com](mailto:megan.lambert@cbre.com))

S. Eric Carlson  
Volkswagen Group of America  
2200 Ferdinand Porsche Drive  
Herndon, VA 20171  
(Sent via E-mail to: [Eric.carlson@vw.com](mailto:Eric.carlson@vw.com))

Subject: Work Plan Approval for Fuel Leak Case No. RO0000400 and GeoTracker Global ID T0600100227, Broadway Volkswagen, 2740 Broadway, Oakland, CA 94612

Dear Ms. Lambert and Mr. Carlson:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the most recently submitted documents entitled, *Groundwater Monitoring Report and Subsurface Investigation and Product Recovery Work Plan* dated July 2, 2012 and September 13, 2012, respectively, which were both prepared by Arcadis. The monitoring report describes the well rehabilitation and sampling methods and presents the results of the sampling which included detecting 0.03 feet of free product. The work plan recommends advancing five soil borings using Membrane Interface Probe (MIP) technology, installing two monitoring wells to define the horizontal extent of petroleum hydrocarbons and free product and conducting a free product bail-down test from former soil vapor extraction well (VW-3).

The proposed scope of work may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed.

#### **TECHNICAL COMMENTS**

1. **Geotracker Compliance** – A review of the State Water Resources Control Board's (SWRCB) GeoTracker website indicates the site has not been claimed, rendering the site to non-compliance status. Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, 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. Also, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude to sub-meter accuracy using NAD 83. A California licensed surveyor may be required to perform this work. Additionally, pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3893, 3894, and 3895, beginning July 1, 2005, the successful submittal of electronic information (i.e. report in PDF format) shall replace the

requirement for the submittal of a paper copy. Please claim your site and upload all future submittals to GeoTracker and ACEH's ftp server by the date specified below. Electronic reporting is described below.

2. **Groundwater Monitoring Well and Boring Locations** – The proposed groundwater monitoring well locations should be based on the results of the MIP study. The borings that have the maximum concentrations should be the ones that are converted to monitoring points. In particular, the proposed well on Broadway appears to be a poor location based on the fact that VW-1 and MW-3 define the downgradient extent of the plume in that general direction. A well closer to former well MW-5 would seem to be more appropriate. Also, please adjust the spacing of your borings so that all four borings are more closely spaced, are positioned along a transect, and are all located on 28<sup>th</sup> Street. Submit a revised map to ACEH for approval prior to performing the borings. Then upon receiving the results of the MIP, please propose an appropriate location for the well based on those results.
3. **Groundwater Monitoring Well Construction** – Arcadis does not specify the depth of the well installation but proposes using 5 to 10 foot screens. ACEH requires shorter screen intervals in order to collect more representative groundwater samples, generally with no more than a 5 foot sand interval; however, ACEH recognizes that fully screened water-bearing zones are appropriate in thinner permeable zones. ACEH requests an effort to minimize the screen length at each well location to the extent possible, with well screens minimally longer than the water-bearing zone, including the capillary fringe. If longer screen intervals are judged appropriate well clusters or multilevel wells (e.g. CMT) may be appropriate. The screen interval should straddle the groundwater table, especially in this case where separate phase hydrocarbons have been encountered. Please submit your well screen length proposal upon completion of the MIP borings and when the new well location is proposed.
4. **Soil Sampling** – In addition to collecting groundwater samples from the boring near MW-4, please collect and analyze soil samples at areas of obvious contamination, the soil/groundwater interface, significant changes in lithology and at a minimum of five foot intervals. The Low-Threat Closure policy (LTCP) identifies the need for shallow soil data in the source area. Since this location is the closest of the five proposed borings to the source area, additional soil samples appear to be appropriate.
5. **Soil Vapor Characterization** – Soil vapor characterization was requested in ACEH's April 6, 2012 letter. Yet no proposal was submitted to evaluate vapor intrusion at the building. Please submit your proposal to evaluate vapor intrusion of volatile organic compounds including BTEX and chlorinated solvents with the results of the investigation requested below.
6. **Free Product Bail Down Test** – The proposed methodology of extracting fluids using a vac truck does not allow for accurate extracted SPH and liquid volume measurement. However, this test may indicate the rate of SPH return. Please ensure that both extracted water and SPH are measured separately and accurately recorded on a data sheet.

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### **NOTIFICATION OF FIELDWORK ACTIVITIES**

Please schedule the fieldwork activities and provide ACEH with at least three (3) business days notification prior to conducting the fieldwork.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to ACEH's ftp site and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below.

- **December 17, 2012** – Geotracker Compliance and Map showing proposed boring locations
- **January 15, 2013** – Preliminary Results of the MIP Investigation, Proposed Well Location Map and Construction Details (File to be named: ANALYT\_R\_yyyy-mm-dd)
- **February 15, 2013** – Soil and Water Investigation Report w/ soil vapor sampling plan (File to be named: SWI\_WP\_R\_yyyy-mm-dd)
- **March 20, 2013** – Quarterly Monitoring Report (1<sup>st</sup> Quarter 2013) (File to be named: GWM\_yyyy-mm-dd)
- **June 20, 2013** – Quarterly Monitoring Report (2<sup>nd</sup> Quarter 2013) (File to be named: GWM\_yyyy-mm-dd)

If you have any questions or concerns regarding this correspondence or your case, please call me at (510) 639-1287 or send me an electronic mail message at [barbara.jakub@acgov.org](mailto:barbara.jakub@acgov.org).

Sincerely,

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

Enclosure: Responsible Party(ies) Legal Requirements/Obligations  
ACEH Electronic Report Upload (ftp) Instructions

cc: Ron Goloubow, Arcadis, 2000 Powell Street, Suite 700, Emeryville, CA 94608 (*Sent via E-mail to: [Ron.Goloubow@arcadis-us.com](mailto:Ron.Goloubow@arcadis-us.com)*)  
Mike Witt, Volkswagen of Oakland, 2740 Broadway, Oakland, CA 94612 (*Sent via E-mail to: [mwitt@oaklandautogroup.com](mailto:mwitt@oaklandautogroup.com)*)  
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (*Sent via E-mail to: [lgriffin@oaklandnet.com](mailto:lgriffin@oaklandnet.com)*)  
Donna Drogos, ACEH (*Sent via E-mail to: [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org)*)  
Barbara Jakub, ACEH (*Sent via E-mail to: [barbara.jakub@acgov.org](mailto:barbara.jakub@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/](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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> July 20, 2010
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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](mailto: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](mailto: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.