

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

COLLEEN CHAWLA, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP) FOR
HAZARDOUS MATERIALS RELEASES
1131 HARBOR BAY PARKWAY
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September 17, 2018

Khamly Chuop
Port of Oakland
530 Water Street
Oakland, CA 94604-2064
(Sent via electronic mail to
kchuop@portoakland.com)

Mr. Dan Tisoncik
United Airlines
1200 E. Algonquin Rd.
Elk Grove Township, IL 60007

Subject: Site Cleanup Program (SCP) case file # RO0000414 and Geotracker Global ID T0600101423, MOIA, United Airlines MF35/36, 1100 Airport Drive, Oakland CA 94621

Dear Ms. Chuop and Mr. Tisoncik:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file including the recently submitted documents entitled *OMC Wells* and *Figure 1*, provided as attachments to an electronic mail correspondence (CORRES) dated August 1, 2018, in conjunction with the document entitled *Work Plan for Groundwater Sampling and Well Abandonment* (Work Plan), dated January 26, 2016 and prepared by Baseline Environmental Consulting (Baseline).

The CORRES documents the location, construction details and condition of the wells comprising the groundwater monitoring well network for the Oakland Maintenance Center (OMC), the subject Site.

In the Work Plan, Baseline proposes to abandon 27 of the network wells prior to the demolition of the Site building, designated as Building M110. Three wells in the network, identified as ERM-MW-9, ERM-MW-10 and ERM-MW-15, will be retained and sampled. As the wells have not been sampled since 2006, Baseline will have the wells redeveloped prior to the proposed one-time sampling event. The recovered water samples will be analyzed for dissolved Title 22 metals.

ACDEH generally concurs with the 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, and submit the technical reports requested below. Please provide 72-hour advance written notification to this office (electronic mail preferred to: keith.nowell@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Electronic Submittal of Information (ESI)** – 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 State Water Resource Control Board's (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 site cleanup (SCP) cases. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites was required in GeoTracker.

A review of the GeoTracker case file reveals the Site is not in compliance with ESI Regulations. Though several reports have been submitted to GeoTracker, it is not clear if all required reports have been submitted. Additionally, GeoTracker does not contain any of the supporting data submittals, including but not limited to:

- **Lab Data:** Analytical data (including geochemical data) for all soil, vapor and water samples that are collected for the purpose of subsurface investigation or remediation are required to be submitted in specified EDF format to a regulatory agency.

- **Boring Logs and Well Screen Intervals:** Boring logs (GEO_BOREs) must be prepared by an appropriate registered professional and need to be submitted in PDF format. If a monitor well is installed, the screen depth and interval must be reported.
 - **Depth to Water Data:** Monitor wells need to have the depth-to-water information reported in the GEO_WELL file whenever the data is collected, even if the well is not actually sampled during the sampling event.
 - **Locational Data:** If samples from the permanent sampling locations are included in a regulatory report to a regulatory agency as part of a cleanup program, these sampling points must be surveyed to an appropriate (NAD 83) datum. This would typically include any groundwater or similar monitoring points at the site that are included in the regulatory report. The surveyed locational information for these sampling points should be submitted using the GEO_XY file.
 - **Elevation Data:** Elevation measurements to the top of groundwater well casings are required for all groundwater monitoring wells (to be submitted as part of the GEO_Z file).
 - **Site Map:** An electronic generalized site plan map is required to be submitted into the State database (GEO_MAP). Site map should display tank locations, streets bordering the facility, and sampling locations for all soil, water and vapor samples and convey report-specific data, such as groundwater contours for a well monitoring event.
2. **Retained Wells** – Based on the reported direction(s) of groundwater flow and the distance to the sensitive receptor (drainage ditch), please include well ERM-MW-16 with the wells to be retained and sampled.

TECHNICAL REPORT REQUEST

Please submit technical reports, and supporting documentation when appropriate, to the SWRCB GeoTracker system according to the following schedule. Please provide ACDEH, Attention: Keith Nowell, with notification of the submittal(s) via electronic mail.

- **November 2, 2018** – Electronic Submittal of Information (Including EDF, GEO_BORE, GEO_WELL, GEO_MAP, GEO_XY and GEO_Z submittals)
- **November 19, 2018** – Groundwater Monitoring Report
- **December 17, 2018** – Well Abandonment Report

Thank you for your cooperation. ACDEH looks forward to working with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send 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

cc: Diane Heinze Port of Oakland, 530 Water Street, Oakland, CA 94604-2064 (*Sent via electronic mail to dheinze@portoakland.com*)

Lydia Huang, Baseline Environmental Consulting, 5900 Hollis Street, Suite D, Emeryville, CA 94608, (*Sent via electronic mail to: lydia@baseline-env.com*)

Dilan Roe, ACDEH, (*Sent via electronic mail to: dilan.roe@acgov.org*)

Paresh Khatri, ACDEH; (*Sent via electronic mail to: paresh.khatri@acgov.org*)

Keith Nowell, ACDEH, (*Sent via electronic mail to: keith.nowell@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.