

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP) FOR
HAZARDOUS MATERIALS RELEASES
1131 HARBOR BAY PARKWAY
ALAMEDA, CA 94502

REBECCA GEBHART, Interim Director

April 26, 2017

Janice M. With Trust
4033 Terra Granada Dr., Unit 1B
Walnut Creek, CA 94595-4004
Attn.: Janice With

Subject: Conditional Work Plan Approval; Alameda County Department of Environmental Health Fuel Leak Case No. RO0000510 and Geotracker Global ID T0600102253, C&L Trucking, 2460 Wood St., Oakland, CA 94607

Dear Ms. With:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file and the recently submitted document entitled *Investigation Workplan* (Work Plan), dated March 20, 2017 and prepared by Hydro Analysis Inc. (HAI) for the subject site. The Work Plan was prepared in response to the request made by ACDEH in our letter dated February 2, 2017.

As part of its preparation for the Work Plan, HAI inspected an onsite groundwater monitoring well, which may not have been sampled for more than 20 years, to evaluate the condition of the well. HAI determined the casing is intact and the condition of the well appears suitable for sample collection. Additionally, HAI contacted the California Department of Water Resources (DWR) for information pertaining to wells at the site. The well search did not identify the presence of wells at the site.

HAI proposes to redevelop the onsite well based on the length of time the well has been out of service. Following redevelopment, HAI will recover a groundwater sample for laboratory analysis. The scope of analysis presented in the Work Plan is total petroleum hydrocarbons (TPH) as diesel (TPHd), benzene, toluene, ethylbenzene, and xylenes (collectively BTEX), and naphthalene.

Based on ACDEH staff review of the referenced document and of the case file, we generally concur with the recently proposed scope of work, provided that the modifications requested below are incorporated during the field implementation. Submittal of a revised Work Plan is not required unless a soil boring will be advanced or an alternate scope of work outside that described in the Work Plan and technical comments below is proposed. We request that you perform the proposed work and send us 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. Well Search** – On January 17, 1990, a 10,000-gallon diesel UST was removed from the subject property. Results of laboratory analysis of soil samples collected in association with the tank removal indicated the presence of TPHd at a concentration of 140 milligrams per kilogram (mg/kg) in the soil sample located toward the street and at a concentration of 1,600 mg/kg in the soil sample located toward the yard. Based on these results it appears the yard-side of the tank pit is the more contaminated side. On January 2, 1991 ACDEH requested the installation of two groundwater monitoring wells. It is unclear if the wells were installed as no documentation pertaining to the well installation is located in our case file, and no well installation permits appear to have been issued.

On December 8, 1995, ACDEH requested a work plan for the installation of two groundwater monitoring wells. One well was to be located on the street side of the former tank pit and the other located inside the property on the opposite side of the former tank pit. One on-site well was sampled on March 1, 1996 and again on February 19, 1997. The well is located on what appears to be the street (lessor contamination) side of the former tank pit. A second well was not observed.

Though a visual inspection of the tank pit area performed by HAI on March 16, 2017 did not reveal evidence of a second well, ACDEH staff is of the opinion the ambiguity of the well installation date may have provided an opportunity for an additional well to have been installed and subsequently paved over should well construction have occurred soon after our initial well installation request. Therefore, in addition to the visual means conducted by HAI, ACDEH requests an additional attempt be made to locate a potential second well. If a well is located, please determine if sufficient deterioration or sedimentation has occurred and if well rehabilitation or re-development should be undertaken prior to sampling. Following the well assessment/rehabilitation the well should be sampled concurrent with the sampling of the street-side well. ACDEH requests a section be included in the groundwater monitoring report requested below documenting the method(s) used for the well search.

Alternatively, or if no well is located, please advance a soil bore inside the property on the opposite side of the former tank pit for the collection of soil and grab-groundwater (GGW) samples for laboratory analysis. If this alternative is pursued, ACDEH requests preparation and submittal of a revised work plan (RWP) for ACDEH review and approval prior to its implementation. Please include standard operating procedures (SOPs) for boring advancement and sampling in the RWP by the date specified below.

2. **Well Development** – The Work Plan outlines what is “typically” done during a well development process, but HAI does not specify what will be performed at the site. ACDEH requests that an appropriate method of well development be used and the work performed in accordance with DWR Bulletin 74-90. As no well construction detail has been found in the ACDEH case file, we request that a determination be made of the depth of the top of the screened interval during the course of fieldwork. Include a discussion of the well development process and well development field form(s) in the groundwater monitoring report.
3. **Analysis Scope** – As indicated above, HAI proposes to analyze groundwater for TPHd using EPA Test Method 8015M and BTEX and naphthalene by EPA Test Method 8260B. In accordance with the California State Water Resources Control Board (SWRCB) Low Threat Underground Storage Tank Case Closure Policy (LTCP), ACDEH requests the addition of methyl tertiary butyl ether (MTBE) in the 8260B analysis. Prior to collection of the groundwater samples, ACDEH requests analytical laboratory staff be contacted for confirmation of the appropriate sample containers for the proposed analysis scope as HAI indicates the samples will be collected in 40 ml VOAs.
4. **Electronic Submittal of Information** – ACDEH requests submittal of GEO_WELL files for the two previous groundwater monitoring events, and based on the well depth and the top of screen data determined for Technical Comment 2 above, please submit a GEO_BORE file documenting well construction detail to the SWRCB GeoTracker website for the well(s). Note the GEO_BORE file(s) should qualify how the detail was prepared. Please include the well construction detail as an attachment to the groundwater monitoring report.
5. **Closure Evaluation** – As presented in the Work Plan, if the results of the investigation provide convincing evidence for “no further action” HAI will provide it in the groundwater monitoring report. ACDEH requests the closure evaluation be performed against the general and media-specific criteria of the LTCP.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

Please note that ACDEH has updated its Attachment 1 with regard to report submittals to ACDEH. ACDEH will now be requiring a Submittal Acknowledgement Statement, replacing the perjury statement, as a cover letter signed by the Responsible Party (RP). 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.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH FTP site (Attention: Keith Nowell), and to the SWRCB GeoTracker website, in accordance with the following specified file naming convention by the date specified below:

- **June 12, 2017 – Electronic Submittal of Information**
- **June 12, 2017 – Revised Work Plan** (only if the soil bore alternative is selected) (file to be named RO0000510_WP_R_yyyy-mm-dd)
- **July 26, 2017 – Groundwater Monitoring Report** (file to be named RO0000510_GWM_R_yyyy-mm-dd)

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

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

cc: Gary Aguiar, Hydro Analysis, Inc., 514 El Cerrito Plaza, El Cerrito, CA 94530 (Sent via electronic mail to gary@hydroanalysis.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)

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

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.

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| 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 acknowledgement 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.