

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

August 9, 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 *Report of Geophysical Survey and Work Plan for Follow-Up Activities (Work Plan)*, dated July 21, 2017 and prepared by Hydro Analysis Inc. (HAI) for the subject site.

The Work Plan presents the findings of a geophysical survey performed for the purpose of identifying a potential second well location on the northeast side of a former underground storage tank (UST) pit. The survey was performed using magnetometer, ground penetrating radar (GPR), and underground utility RF frequency scanner technologies. The results of the survey confirmed the former UST pit location and identified subsurface utilities within the area investigated. Additionally the GPR identified an anomaly, referred to as an area of interest, in the vicinity of the location of a suspected second groundwater monitoring well.

The Work Plan provided contingencies regarding the possible presence of the well. If a second well was located, it would receive a new flush-mounted well box, and the condition of the well would be determined and its suitability for sampling evaluated. If no well was located, HAI would prepare a work plan for a subsurface investigation.

Subsequent to the geophysical survey, ACDEH was informed in an electronic mail correspondence dated August 8, 2017, the area of interest has been investigated and that no well was located.

HAI proposes to redevelop the existing onsite well. 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.

ACDEH notes the activities outlined in the Work Plan is limited and that we have inferred the information presented in a previous HAI work plan, dated March 30 2017, is similar to the work activities presented in this document. ACDEH staff generally concurs 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 all field activities.

TECHNICAL COMMENTS

- 1. Proposed Work Schedule** –The State Water Board (SWRCB) allows lead agencies providing oversight on cases in the local oversight program (LOP) 60 days in which to review and respond to the Responsible Party for report submittals. The Work Plan was received by our office on August 1, 2017. However, the schedule of events outlined in the Work Plan propose activities to investigate the location of the possible second well on August 4, 2017; develop and sample the existing well on August 8, 2017; and submit the groundwater monitoring report by August 18, 2017.

Work performed without lead agency approval may be viewed as unreliable as the work may not have been performed in accordance with appropriate guidance or to industry standards. Additionally, work performed for LOP cases without lead agency approval may not be reimbursable by the SWRCB Cleanup Fund (CUF).

- 2. Well Construction** – As indicated in our letter dated April 26, 2017, no well construction detail has been found in the ACDEH case file for the site well. We request that a determination be made of the depth of the top of the screened interval during well development (Technical Comment 3 below) so the information can be incorporated into the well sampling requested in Technical Comment 4 below.

As an alternative, please submit the well construction detail to the SWRCBs GeoTracker website.

- 3. Well Development** – ACDEH understands the well will be developed by hand bailing for water removal and, as stated by HAI, that a surge block is ‘typically’ used during the development process. It is unclear to ACDEH what work will be performed during the course of well development. Submittal of the Work Plan provided HAI an opportunity to provide its Standard Operation Procedures (SOPs) regarding well development; however, they were not included in the Work Plan.

ACDEH requests that an appropriate method of well development be used and the work performed in accordance with DWR Bulletin 74-90. Please include a discussion of the well development process and well development field form(s) in the groundwater monitoring report requested below.

- 4. Well Sampling** - HAI's SOPs for well sampling were not included as an attachment to the Work Plan. ACDEH understands the well will be purged by bailing, which will continue until the monitored parameters are ‘reasonably stabilized’. It is unclear to ACDEH what is meant by *reasonably stabilized* as this term was not defined in the Work Plan.

ACDEH requests the following parameter values for evaluating groundwater monitoring field parameter stabilization: temperature: ± 3% of reading (minimum of ± 0.2° C); specific electrical conductance (SEC): +/- 0.1; oxidation-reduction potential (ORP): +/- 10 millivolts; dissolved oxygen (DO): +/- 0.3 milligrams per liter.

ACDEH is of the opinion that purging with the use of a bailer can excessively disrupt the well and potentially affect sample quality. Therefore, ACDEH discourages the use of this technique for purging. However, ACDEH requests care be exercised to minimize these effects if this technique is used.

The Work Plan states the well will be developed and sampled on August 8, 2017. ACDEH request a minimum of 48 hours pass between well development and well sampling.

The Work Plan does not address sample collection containers. In the HAI work plan dated March 30 2017, HAI states the samples will be collected in 40 ml VOAs. As indicated in our April 26, 2017 letter, ACDEH is of the

opinion the 40 ml VOAs are not appropriate for all the proposed analyses. ACDEH requests analytical laboratory staff be contacted for confirmation of the appropriate sample containers for the proposed analysis scope.

5. **Analysis Scope** – In the Work Plan, HAI states that the groundwater sample will be analyzed for total petroleum hydrocarbons (TPH) as diesel (TPHd) by EPA Test Method (TM) 8015M, and benzene, toluene, ethylbenzene, and xylenes (collectively BTEX) and naphthalene by TM 8260B. ACDEH requests the addition of TPH as gasoline (TPHg) and methyl tertiary butyl ether (MTBE) to the analysis scope. These chemicals are also reported by the 8260B analysis and would not be expected to incur additional laboratory costs.
6. **Subsurface Investigation Work Plan** – As stated in the Work Plan, if a second well was not located, HAI will prepare a work plan for a subsurface investigation. Subsequent to Work Plan preparation, ACDEH was informed that no well was located. Therefore, ACDEH requests preparation and submittal of a subsurface investigation work plan by the date specified below. Please develop the work plan to address data gaps for the general and media specific criteria of the SWRCBs Low Threat Underground Storage Tank Case Closure Policy (LTCP).
7. **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. Note the GEO_BORE file should qualify how the detail was prepared. Please include the well construction detail as an attachment to the groundwater monitoring report requested below.

Additionally the report on groundwater well sampling and analysis, requested below, will generate EDF, GEO_WELL, and GEO_MAP files in addition to the GEO_REPORT for submittal to GeoTracker.

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:

- **September 7, 2017 – Work Plan for a Subsurface Investigation** (file to be named RO0000510_WP_R_yyyy-mm-dd)
- **October 9, 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

Janice M. With Trust
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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.

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.