

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

COLLEEN CHAWLA, Agency Director

August 24, 2018

Janice M. With Trust
1614 Stanley Dollar Drive #1B
Walnut Creek, CA 94595
Attn.: Janice With

Subject: Work Plan Request; 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 most current documents submitted entitled *Report of Geophysical Survey and Work Plan for Follow-Up Activities (Work Plan)*, dated July 21, 2017 and *Groundwater Monitoring Report (GWMR)*, dated October 18, 2017. Both documents were prepared by Hydro Analysis, Inc. (HAI) for the subject site on your behalf.

The site is occupied by an active trucking company. Development of the property includes buildings for maintenance, shipping/receiving docks and offices, and paved parking. A paved asphaltic patch is located in the vicinity of a diesel underground storage tank (UST) reported to have been removed circa 1990. Two groundwater monitoring wells were alleged to have been installed following the removal of the UST; however, only one well is observed on the property.

Work Plan-The Work Plan presents the findings of a geophysical survey performed for the purpose of verifying the presence/absence of the UST and an attempt to locate the potential second well. Evidence suggests the second well location to be on the northeast side of the UST pit. The survey was performed using magnetometer, ground penetrating radar (GPR), and underground utility RF (radio frequency) frequency scanner technologies. The results of the survey (1) confirmed the former UST pit location was not currently occupied by a UST, (2) identified the presence of subsurface utilities within the area investigated, and (3) identified an anomaly, referred to as an area of interest, in the vicinity of the location of the suspected (second) groundwater monitoring well.

The Work Plan provided contingencies regarding the possible presence of the second well. The contingencies included Task #3 and Task #4. Task #3 proposed work if a second well was found, and Task #4 proposed preparation of a work plan for a down-gradient investigation if no well was found.

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

GWMR- The GWMR presents the findings of an exploratory excavation of the area of interest identified during the geophysical investigation, discussed above, and a groundwater monitoring and sampling event conducted for well MW-1, an on-site well located adjacent to the southwest side of the UST pit.

No evidence of a well was identified in the area of interest.

Well MW-1 was monitored and sampled on October 2, 2017. Depth to water was measured at approximately 3.48 feet below the ground surface (bgs). The laboratory analytical report for the water sample documented a concentration of total petroleum hydrocarbons (TPH) as diesel (TPHd) at 530 micrograms per liter (ug/L) with concentrations of TPH as

gasoline (TPHg), benzene, toluene, ethylbenzene, and xylenes (collectively BTEX), methyl tertiary butyl ether (MTBE) and naphthalene below the laboratory's respective reporting limits.

Based on the findings of the GWMR, HAI recommended (1) the periodic monitoring of groundwater to assess concentration trends and plume stability and (2) after a reasonable period of groundwater monitoring, assess the site for closure under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP).

TECHNICAL COMMENTS

ACDEH is in general agreement with HAI with regard to the proposed Task #4 of the Work Plan- preparation of a work plan for a down-gradient investigation- as no well was found and GWMR Recommendation (1)- periodic monitoring of groundwater the assess concentration trends and assess plume stability, and Recommendation (2)- assess the site for closure under the LTCP.

Therefore, ACDEH requests preparation of a work plan for site evaluation and investigation to address Task #4 and Recommendation #1. Please prepare the investigation addressing Task #4 in conjunction with the LTCP. Following submittal of the site investigation and groundwater monitoring report requested below, ACDEH will review the case against the LTCP closure criteria (GWMR Recommendation 2).

In accordance with the LTCP soil and groundwater are to be tested for MTBE. Following the site investigation and groundwater monitoring report requested below, MTBE may be eliminated from the scope of analysis for future investigations and monitoring should concentrations of MTBE be reported at levels below un-diluted laboratory reporting limits.

TECHNICAL REPORT REQUEST

Please upload technical reports to the SWRCB GeoTracker website, in accordance with the following specified file naming convention by the date specified below. ACDEH requests notification via electronic mail (preferred), Attention: Keith Nowell, of submittals to GeoTracker.

- **October 23, 2018 – Site Investigation and Groundwater Monitoring Report Work Plan** (file to be named RO0000510_WP_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

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cc: Terry With McBriarty, (*Sent via electronic mail to terryawith@gmail.com*)

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

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.