

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP) FOR
HAZARDOUS MATERIALS RELEASES
1131 HARBOR BAY
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

June 12, 2017

Argonaut Holdings, LLC
300 Renaissance Center
Detroit, MI 48243
Attn.: Mark Sloan

D Thompson Properties
750 NE Columbia Blvd.
Portland, OR 97211-1406
Attn.: David Thompson
(Sent via electronic mail to:
dthompson@tecequipment.com)

General Motors Company
c/o Mail Code 482-C14-C66
300 Renaissance Center
Detroit, MI 48243
Attn.: Environmental Compliance Manager

Subject: Request for Site Conceptual Model Update and Data Gap Identification Work Plan, Local Oversight Program Fuel Leak Case No. RO0001389 and GeoTracker Global ID T0600101692, GMC Truck Center, 8099 S Coliseum Way, Oakland, CA 94621

Dear Responsible Parties:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file for the subject fuel leak case. In our letter dated October 23, 2015, our agency requested the electronic submittal of information to the ACDEH FTP and the California State Water Resources Control Board's (SWRCB) Geotracker websites. In an electronic mail correspondence dated December 30, 2015, ACDEH received notification from Arcadis U.S. Inc. (Arcadis) that document submittals have been completed. Thank you for the document submittals.

Following a review of the reports ACDEH participated in a conference call on March 16, 2016 with Ky Fullerton representing the property tenant, TEC Equipment, and Allyn Begnoche and Sarah Smaltz, both of Arcadis- the consulting firm for General Motors Company. ACDEH lead off the discussion by stating the case may meet much of the SWRCBs Low Threat Underground Storage Tank Case Closure Policy (LTCP). However, there are some issues that remain to be resolved and are presented as Items 4 through 7 below.

We request that you address the following technical comments and send us the technical reports described below.

Technical Comments

- 1. Incomplete Reporting** – A review of the GeoTracker database indicated that several report submittals were denied as the reports were incomplete. Specifically, the groundwater monitoring reports do not contain the field data sheets for verification of data presented in the reports. Field data sheets are an integral part of a groundwater monitoring report. ACDEH requests these reports be resubmitted to include the field data sheets for our review. Please submit the revised reports to both GeoTracker and to the ACDEH FTP sites. Additionally, these reports reference standard operating procedures (SOPs) for conducting field work. However, the SOPs are not included as an attachment. Please include the appropriate SOPs as an attachment to the report resubmittals. Alternatively, please upload the referenced master SOP document(s) as a stand-alone report(s) for our review. Please perform the submittals by the date specified below.

2. **GEO_MAPs** – ACDEH notes that five groundwater monitoring reports have been submitted to GeoTracker, but only one GEO_MAP has been submitted which depicts the groundwater contours and flow direction. ACDEH requests the groundwater contour map for each monitoring event be uploaded as the associated GEO_MAP for these reports. Additionally, one GEO_MAP submittal depicts the cross section lines for the associated report; however, the cross sections are not included with the figure. Please resubmit the figure with the associated cross sections as a single GEO_MAP.
3. **Data Reporting** – Please update the analysis summary tables with the most current values of the San Francisco Bay Region, Regional Water Quality Control Board (SFBR-RWQCB) Environmental Screening Levels (ESLs). Additionally, ACDEH requests a column for depth to water reporting in the monitoring well summary tables to aid in the evaluation of concentration trends. Please report groundwater analytical concentrations in micrograms per liter ($\mu\text{g/L}$).
4. **Wetlands** – As discussed in our conference call, there appear to be impacts to the adjoining wetlands along the north and west the sides of the property. Specifically, it was unclear to ACDEH if the tidal/flood control channel to the north was concrete-lined throughout its length along the property as sediment sample SW-2 and SW-3 were reported to contain up to 420 milligrams per kilogram (mg/kg) total petroleum hydrocarbons (TPH) as oil (TPHo), and impacts to the west, as demonstrated by on-site soil bore SB-14 through SB-17 and farther west off-site bores SB-24, SB-25 and SB-26, were reported to contain up to 17,000 ug/L TPHo in grab groundwater samples. Therefore, ACDEH considers ecological risk a data gap. Please address this in the Site Conceptual Model and Data Gap Identification Work Plan requested below.
5. **Groundwater Flow** – Appendix E of the document entitled *Site Conceptual Model and Request for Site Closure (SCM/RFC)*, dated December 18, 2013 and prepared by Arcadis, contains seven groundwater potentiometric surface maps. Six of the maps portray groundwater flow perpendicular to the western downward slope to the wetland. This seems counter-intuitive to ACDEH, which suspects the potentiometric surface may parallel the slope in this location. Please address the groundwater flow near the western site area in the Site Conceptual Model and Data Gap Identification Work Plan requested below.
6. **Tidal Influence** – San Leandro Bay, located less than 2,900 feet down channel from both wetlands referenced in Item 4 above, is a tidally influenced surface water body which connects to the open channel along the northern property boundary. The channel also connects with the western wetland. Hence, these features may also be tidally influenced. During the conference call, ACDEH asked if the monitoring wells, especially those nearest the wetlands, e.g. MWs 5 through 8 or 9 through 11, may also be tidally influenced. The question was left open for additional study. Please address this in the Site Conceptual Model and Data Gap Identification Work Plan requested below.
7. **Deed Restriction** – ACDEH was under the impression that the Deed Restriction (DR), dated May 30, 2013, restricted site development to the footprint of the existing structure. However, a review of the DR by ACDEH for the conference call did not reveal language to that effect. Please review the DR and determine if future development is restricted to the current building footprint. Discuss your findings in the Site Conceptual Model and Data Gap Identification Work Plan requested below.

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 SWRCBs GeoTracker website, in accordance with the following specified file naming convention and schedule:

- **June 30, 2017 – GEO_MAP submittals** (to GeoTracker)
- **July 17, 2017 – Groundwater Monitoring Report resubmittals with SOPs** (both ACDEH FTP and GeoTracker) (file name: RO0001389_GWM_R_YYYY-mm-dd)
- **August 15, 2017 – Site Conceptual Model and Data Gap Identification Work Plan** (file name: RO0001389_SCM_WP_R_YYYY-mm-dd)

If your email address does not appear on the cover page of this notification, ACDEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

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 &
ACEH Electronic Report Upload (ftp) Instructions

cc: Laura Curtis, Arcadis US, Inc., 28550 Cabot Drive, Suite 500, Novi, MI, 48377 (*Sent via electronic mail to:*
Laura.Curtis@arcadis.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.