

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

COLLEEN CHAWLA, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP) FOR
HAZARDOUS MATERIALS RELEASES
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September 28, 2018

Rolls-Royce Engine Services
7200 Earhart Road
Oakland, CA 94621-4504
Attn.: Dave Goldberg
(Sent via electronic mail to Dave.Goldberg@rolls-royce.com)

Subject: Conditional Work Plan Approval, Site Cleanup Program Case No. RO0002606 and GeoTracker Global ID T06019775776, MOIA, National Airmotive Corporation, 6701 Earhart, Oakland, CA 94621

Dear Mr. Goldberg,

Thank you and Kristen Denney of Rolls Royce Engine Services (RRES), Eric Englehart representing the Port of Oakland, and Kyle Flory and Chris Baldassari of PES Environmental, Inc. (PES) for meeting with Alameda County Department of Environmental Health (ACDEH) staff on September 26, 2018. At the meeting PES presented the status of the engine test facility and the proposed work associated with facility decommissioning. A sequencing for permitting and phases of facility decommissioning was presented in conjunction with RRES personnel, indicating their site lease with the Port of Oakland ends in January, 2020. The disposition of the site following facility decommissioning was site was addressed by the Port of Oakland.

As part of its presentation regarding future work, PES discussed its July 20, 2018 document entitled *Revised Work Plan for Soil and Groundwater Sampling and Analysis (Work Plan)* prepared for the subject case. The Work Plan proposes a scope of work for conducting a preliminary assessment of soil and groundwater conditions for Rolls Royce in preparation of facility closure.

At the meeting ACDEH identified several groundwater monitoring wells, in particular MW-4, reported for the March 2018 monitoring event, which are exhibiting concentrations inconsistent with other recent groundwater concentrations. RRES noted that a more recent groundwater monitoring event has been conducted, and submittal of the monitoring event report will occur in the near future. It was agreed the discussion of the concentration inconsistencies would be postponed until the next meeting, scheduled for December 5, 2018, following review of the new data. Additionally, data from the Work Plan implementation may be available for inclusion at the December meeting discussion.

Based on our meeting discussion and ACDEH staff review of the Work Plan and case file, we generally concur with the recently proposed scope of work, provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. Unless 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 and paresh.khatri@acgov.org) prior to the start of field activities.

As indicated at the meeting, residual petroleum hydrocarbon contamination remains at the site and may need to be addressed in future submittals regarding facility closure.

TECHNICAL COMMENTS

1. **Project Schedule** – ACDEH requests submittal of a project schedule presenting the sequencing and timing of activities associated with the engine test facility decommissioning. Please include milestone dates for

activities such as CEQA, permitting for site investigations, CUPA permitting, well destruction, facility demolition and site cleanup. ACDEH requests submittal of the project schedule by the date specified below.

- 2. Silica Gel Cleanup** – ACDEH is in general agreement with the analysis program presented in Work Plan Table 2. As presented, PES proposes a scope of analysis for soil and grab-groundwater GGW samples to include the extractable total petroleum hydrocarbons (TPH) as diesel (TPHd), TPH as motor oil (TPHmo) and TPH as jet fuel (TPHjf) with TPHd and TPHmo analysis performed both with and without silica gel cleanup (SGC). ACDEH notes that previous extractable TPH analysis was typically performed using SGC.

ACDEH's request for non-SGC analyses is based on the San Francisco Bay Region, Regional Water Quality Control Board (Region 2), which does not utilize SGC when evaluating concentrations of TPHd and TPHmo with the Environmental Screening Levels (ESLs). For consistency, ACDEH follows the Region 2 lead when evaluating cases having including the indication that the TPHd and TPHmo analysis will be performed both with and without SGC concentrations with regard to the ESLs. Therefore, TPHd and TPHmo analyses should be performed without SGC for evaluation of risks to human or ecological receptors. However, ACDEH acknowledges that useful information may be gathered when comparing TPH concentrations for a sample analyzed both with and without SGC. Therefore, SGC may also be used on samples for comparison with non-SGC concentrations.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mark Detterman), according to the following schedule:

- **October 29, 2018** – Project Schedule (file name to be named: RO0002606_DEV_SCHD_yyyy-mm-dd)
- **December 27, 2018** – Soil and Groundwater Investigation Report (file name to be named: RO0002606_SWI_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

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations

cc: Eric Englehart, Port of Oakland (*Sent via electronic mail to: eenglehart@portoakland.com*)
Kristen Denney Rolls-Royce Engine Services (*Sent via electronic mail to: kristen.denney@rolls-royce.com*)
Kyle Flory, PES Environmental, Inc. (*Sent via electronic mail to: kflory@pesenv.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.