



March 29, 2018

Mr. Chester Nakahara
City of Piedmont
120 Vista Avenue
Piedmont, CA 94611

(Sent via electronic mail to: cnakahara@ci.piedmont.ca.us)

Subject: **Request for Remedial Progress Report (With Analytical Testing and Discharge Permitting Status)**, Fuel Leak Case RO0003047 and GeoTracker Global ID T0600101084, City of Piedmont City Hall, 120 Vista Avenue, Piedmont, CA 94611

Dear Mr. Nakahara:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the status of the subject site, including the document entitled *City of Piedmont Fuel Leak Case RO0003047*, dated February 27, 2018. The document was submitted by City of Piedmont staff and consisted of a laboratory analytical report for a grab water sample collected from the groundwater sump basin located at the northwest corner of City Hall. Thank you for submitting the data.

The analytical data indicate concentrations of Total Oil & Grease (TOG) are non-detectable at <5,000 micrograms per liter (μL , or 5.0 milligrams per liter [mg/l]), and all Volatile Organic Compounds (VOCs, using a full scan) are non-detectable at slightly elevated non-detectable concentrations that range between 12 and 100 μL . This VOC analytical data is generally consistent with previous analytical data indicating that hydrocarbon related VOCs (including benzene, toluene, ethylbenzene, total xylenes, and methyl tert butyl ether – or BTEX and MTBE) were non-detectable at 0.5 μL .

At this juncture ACDEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

1. **Remedial Progress Report** – ACDEH requests the submittal of a Remedial Progress Report (REM) detailing the status of additional analytical testing requested below, and the status of the sanitary sewer discharge permit. Please submit the REM by the date identified further below.
 - a. **Grab Sump Water Analytical Testing** - ACDEH notes that the analytical laboratory stated in the analytical report that matrix interferences required a five-fold dilution of the sample (thus producing the moderately elevated detection limits cited above). Because the former underground storage tanks (UST) at the site stored both gasoline and diesel, it is necessary to analyze the grab sump water sample for Total Petroleum Hydrocarbons as gasoline (TPHg), as diesel (TPHd), and naphthalene (not previously analyzed for at the site). This is particularly important due to the identified remedial action of installing the sanitary sewer connection to divert the sump water discharge to the sanitary sewer rather than to city streets, as a direct result of the detection of 5,200 μL TPHd in groundwater at the site. ACDEH anticipates that the matrix interferences encountered by the laboratory may be due to the presence of either TPHg, TPHd, or naphthalene contaminants in the grab sample. Therefore, ACDEH requests additional analytical testing for TPHg, TPHd, and naphthalene concentrations in the sump water discharge.
 - b. **Discharge Permit** – Based on previous verbal communications, ACDEH understands that the City may have the understanding that the discharge permit may not be required due to the non-detectability of TOG, rather than TPHg, TPHd, or naphthalene. Until the additional analytical data discussed above is provided, ACDEH reaffirms the request documenting the status of

EBMUD permitting for the sanitary sewer discharge. Please provide documentation that a discharge permit has been obtained from EBMUD by the date identified below, and submit the report as a Remedial Progress Report as also identified below.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

Please note that ACDEH has updated 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 submit the following technical reports and deliverables to the State Water Board's Geotracker website and notify your case worker by electronic mail (mark.detterman@acgov.org), in accordance with the following specified file naming convention and schedule, as provided below, and in the Responsible Party(ies) Legal Requirements/Obligations which is included as Attachment 1. Please note ACDEH no longer accepts reports on the ftp site.

- **June 8, 2018** – Remedial Progress Report (Including Additional Analytical Data and Documentation of EBMUD Discharge Permit); File to be named: RO3047_REM_L_yyyy-mm-dd

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Thank you for your cooperation. Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,



Mark Detterman, PG, CEG
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements/Obligations and Electronic Report Upload (ftp) Instructions

cc: Mark Oberfell, 1400 Neotomas Avenue, Santa Rosa, CA 95404;
(Sent via electronic mail to: oberfell@coastlandcivil.com)

John Wanger, 120 Vista Avenue, Piedmont, CA 94611
(Sent via electronic mail to: wanger@coastlandcivil.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)
Mark Detterman, ACDEH, (Sent via electronic mail to: mark.detterman@acgov.org)
Electronic File; GeoTracker

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.