

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM FOR
HAZARDOUS MATERIALS RELEASES
1131 HARBOR BAY PARKWAY, SUITE 250
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

October 26, 2016

The Salvation Army
601 Webster Street
Oakland CA 94607
Attn.: Major Jack Phillips
(Sent via electronic mail to Jack.phillips@usw.salvationarmy.org)

Subject: Report Review for Fuel Leak Case No. RO0003084 and Geotracker Global ID T10000003428, The Salvation Army, 601 Webster St., Oakland, CA 94607

Dear Major Phillips:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the recently submitted document entitled *Quarterly Groundwater Monitoring and Site Status Report- First and Second Quarter, 2016* (GWM), dated August 31, 2016, and associated electronic submittals to the State Water Resources Control Board's (SWRCBs) GeoTracker website uploaded on September 23, 2016. The submittals were prepared by ATC Group Services LLC (ATC) for the subject site. The GWM was received by ACDEH on September 27, 2016.

The GWM included the presentation of the groundwater analysis results for sampling conducted for the groundwater monitoring well network, which consists of four (4) wells. The wells are currently sampled quarterly and the GWM presents the findings of the first and second quarters, 2016.

Based on ACDEH staff review of the GWM, we request incorporating the following technical comments into future reporting, including groundwater monitoring reports.

TECHNICAL COMMENTS

1. Scope of Analysis —

- A.** Total petroleum hydrocarbons (TPH) as gasoline (TPHg) and TPH as diesel (TPHd) have been reported in site groundwater at concentrations up to 280,000 micrograms per liter (µg/L) and 270,000 µg/L, respectively. These concentrations indicate a fuel release has occurred at the site. The SWRCB Leaking Underground Fuel Tank Guidance Manual (September 2012) recommends the scope of the analyses include naphthalene for sites with TPHg or TPHd releases. Therefore, ACDEH requests the inclusion of naphthalene in the analysis scope for future soil and water investigations until such time that the lead oversight agency recommends to discontinue the practice.
- B.** The lead scavenger 1,2-dichloroethane (EDC) has been reported at the site. Please include the lead scavengers EDC and 1,2-dibromochloroethane (EDB) in the scope of analyses for future soil and water samples until such time that the lead oversight agency recommends to discontinue the practice.

- 2. Silica Gel Cleanup —** San Francisco Bay Region, Regional Water Quality Control Board (SFBR-RWQCB) does not utilize silica gel clean up (SGC) when evaluating concentrations of TPHd and TPH as motor oil (TPHmo) with the Environmental Screening Levels (ESLs). For consistency, ACDEH follows the SFBR-RWQCB lead when evaluating cases having TPHd and TPHmo 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.

As the Regional Water Board staff will accept SGC for the purpose of comparison of duplicate samples processed with and without SGC to assess the relative degree of biodegradation, ACDEH recommends SGC be used on selected samples for comparison with non-SGC concentrations.

3. **Data Presentation** — There appears to be significant variability of chemical concentration data reported for potential chemicals of concern (PCOCs) for individual monitoring wells. In order to better assess the variability, ACDEH requests insertion of a column in Table 3 – Groundwater Sample Analytical Results– for reporting the depth to water (DTW) data for the monitoring wells. Additionally, please include a column for reporting naphthalene concentrations discussed in Technical Comment 1A above.
4. **Electronic Submittal of Data** — In addition to submitting documents to both the ACDEH ftp site and the SWRCB GeoTracker website, GeoTracker requires submittal of supporting documentation. For groundwater monitoring events, supporting documents include submittal of the laboratory analysis report in EDF format, a GEO_MAP depicting information relevant to the event (e.g. a groundwater contour map), and a GEO_WELL file reporting the DTW data. ACDEH requests submittal of the report and all appropriate supporting documentation for each event to the Geotracker website for ACDEH staff review.
5. **Well Sampling Frequency** — As referenced in Technical Comment 3 above, there appears to be significant variability of PCOC concentrations. In order to establish a more comprehensive data set, ACDEH requests monitoring of the well network continue on a quarterly basis through 2017.

NOTIFICATION OF FIELDWORK ACTIVITIES

Please provide ACDEH with at least three (3) business days notification prior to conducting the fieldwork.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH ftp site (Attention: Keith Nowell), and to the State Water Resources Control Board's Geotracker website, in accordance with Attachment 1 and the following specified file naming convention and schedule:

- **January 22, 2017:** Fourth Quarter 2016 Groundwater Monitoring Report. File to be named: RO0003084_GWM_R_yyyy-mm-dd
- **April 28, 2017:** First Quarter 2017 Groundwater Monitoring Report. File to be named: RO0003084_GWM_R_yyyy-mm-dd
- **July 28, 2017:** Second Quarter 2017 Groundwater Monitoring Report. File to be named: RO0003084_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

Enclosures: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations &
ACDEH Electronic Report Upload (ftp) Instructions

cc: Kaye Patterson, The Salvation Army USA Western Territory Offices, 180 East Ocean Blvd., 3rd
Floor St, Long Beach, CA 94607 (*Sent via electronic mail to*
kaye.patterson@usw.salvationarmy.org)

Mike Sonke, ATC Group Services LLC, 1117 Lone Palm Ave, Ste B, Modesto, CA 95351 (*Sent*
via electronic mail to: mike.sonke@atcassociates.com)

Gabe Stivala, ATC Group Services LLC, 915 Highland Pointe Drive, Suite 250, Roseville, CA
95678 (*Sent via electronic mail to:* gabe.stivala@atcassociates.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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) 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 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 Spills, Leaks, Investigations, and Cleanup (SLIC) 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 for more information on these requirements (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." 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 6735, 6835, and 7835.1) 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 registered 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 fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later 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 SLIC)	REVISION DATE: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) 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 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) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) 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.