



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

May 7, 2014

Mr. Mike Parker (*Sent via E-mail to: [mparker@quattrorealty.com](mailto:mparker@quattrorealty.com)*)  
Quattro Realty Group  
500 La Gonda Way, Suite 295  
Danville, CA 94526

Subject: Work Plan Review for SLIC Case No. RO0003131 and GeoTracker Global ID T10000005547,  
The Green, 5411 Martinelli Way, Dublin, CA 94568

Dear Mr. Parker:

Alameda County Environmental Health (ACEH) has reviewed the Spills, Leaks, Investigations, and Cleanup (SLIC) case for the above referenced site including the document entitled, "*Workplan for Further Investigation*," dated April 23, 2014 (Work Plan). The Work Plan proposes the following investigation activities:

- Soil and groundwater sampling in the former Fuel Depot area
- Shallow soil sampling along the former Railroad Spur
- Sampling of soil stockpiles
- Sampling for metals at five locations.

Based on our review of the Work Plan, we have several technical comments which will require modifications and/or additions to the Work Plan. We request that you submit a Revised Work Plan that addresses the technical comments below.

### **TECHNICAL COMMENTS**

1. **Fuel Depot Borings.** The Work Plan proposes direct push soil borings at four locations. The proposed boring location that is within the blue outline of the Fuel Depot area as presented on Figure 9 of the Work Plan is acceptable. The remaining three proposed borings are approximately 100 feet south, 125 feet west, and 130 feet east, respectively, of the proposed boring within the Fuel Depot area. One of the primary purposes of the borings is to define the extent of soil contamination in the Fuel Depot area. Three of the four proposed borings appear to be too far from the Fuel Depot area to meet this objective. Therefore, we request that the plan for proposed borings within the Fuel Depot area be revised to include a total of six soil borings that are located within closer proximity to the Fuel Depot Area. Using the currently proposed boring within the Fuel Depot Area as a central point of reference (within the blue outline on Figure 9), we request that the remaining five soil borings be advanced approximately 50 feet northwest, 50 feet northeast, 50 feet east, 50 feet southwest, and 50 feet southeast of the centrally located boring.

We request that the soil borings be continuously sampled for logging and screening purposes to the total depth of the boring. Soil samples are to be visually logged in the field for soil type, color, moisture content, odor, and other observed features and screened with a photoionization (PID) detector. We request that soil samples be collected for laboratory analysis from any interval where staining, odor, or elevated PID readings are observed. If no staining, odor, or elevated PID readings are observed, collection of soil samples for laboratory analysis at five foot intervals is

acceptable. Soil samples are to be analyzed for TPH as gasoline, diesel, and fuel oil using EPA Method 8015 Fuel Screen; BTEX, fuel oxygenates, naphthalene, and lead scavengers (EDB and EDC) using EPA Method 8260B, organic lead using DHS LUFT Method, and total lead using EPA Method 6010B. Please include these modifications in the Revised Work Plan requested below.

The proposed collection of grab groundwater samples from each boring using a Hydropunch or similar discrete sampling equipment is acceptable. We request that the groundwater samples be analyzed for TPH as gasoline, diesel, and fuel oil using EPA Method 8015 Fuel Screen and volatile organic compounds (full scan including chlorinated hydrocarbons, oxygenates, and alcohols) using EPA Method 8260B. Please include these modifications in the Revised Work Plan requested below.

2. **Railroad Spur.** The Work Plan indicates that no evidence of the former rail spur was found. The area has been graded with no signs of the rails, ballast, or ties. The Work Plan proposes the collection of soil samples approximately 10 feet and 20 feet on either side of the former spur from a depth of approximately 2 feet. The proposed locations of the three transects is acceptable. However, we request that one additional soil sample be collected from each transect. In addition to the proposed offset samples, we request that one additional soil sample be collected directly along the projected former rail spur. At each of the three locations, soil samples are to be collected from depths of 0.5 feet below ground surface (bgs). The proposed analyses appear to be generally acceptable; however, the specific methods were not identified. In place of total oil and grease, we recommend analysis for hexane extractable materials using EPA method 9071B. Please include these modifications in the Revised Work Plan requested below.
3. **Herbicides/Metals.** The Work Plan proposes metals analysis of shallow soil samples from five locations previously sampled in 2013. The proposed scope of work is generally acceptable; however, the depth of the shallow soil samples is not specified. We request that the soil samples be collected from a depth of 0.5 feet bgs. Please include these modifications in the Revised Work Plan requested below
4. **Site Grading and Stockpiles.** The Work Plan proposes collection of a composite sample from the soil and gravel stockpile. For soils that may be used on site, we request that at a minimum, the sampling be consistent with guidance in the California Department of Toxic Substances Control document entitled, "*Information Advisory, Clean Imported Fill Material,*" dated October 2001. In order to assess the adequacy of proposed sampling, we request that the following information be included a Revised Work Plan:
  - Whether the soil will potentially be re-used on-site.
  - Volume of the soil stockpiles.
  - Source of fill. If unknown, please state unknown source.
  - Heterogeneity of the fill.
  - Whether the fill contains any debris or construction material.
  - Types of samples proposed (example composite or discrete).
  - Proposed distribution within the stockpile (depth, etc.).

Please note that composite soil sampling is generally not acceptable for volatile or semi-volatile analysis, soils with a high clay content due to difficulties in mixing, and for materials that are variable in character. Please include this additional information and proposal for stockpile soil sampling in the Revised Work Plan requested below

5. **GeoTracker Submittals.** As described in the attached Responsible Party(ies) Legal Requirements/Obligations, all technical reports must be submitted to both the ACEH ftp site and the State Water Resource Control Board (SWRCB) GeoTracker website. Therefore, please claim your site on GeoTracker and upload the Work Plan and all future reports to the GeoTracker website. Pursuant to CCR Sections 2729 and 2729.1, beginning July 1, 2005 for SLIC cases, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACEH ftp site (Attention: Jerry Wickham), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **June 13, 2014** – Revised Work Plan  
File to be named: WP\_R\_yyyy-mm-dd RO3131

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org). Case files can be reviewed online at the following website: <http://www.acgov.org/aceh/index.htm>.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297  
Senior Hazardous Materials Specialist

Attachment: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Greg Stahl, Ground Zero Analysis, Inc., 1172 Kansas Avenue, Modesto, CA 95351 (Sent via E-mail to: [gstahl@groundzeroanalysis.com](mailto:gstahl@groundzeroanalysis.com))

Ryan Batty, California Department of Toxic Substances Control, Sacramento, CA (Sent via E-mail to: [rbatty@dtsc.ca.gov](mailto:rbatty@dtsc.ca.gov))

Jerry Wickham, ACEH (Sent via E-mail to: [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org))  
GeoTracker, eFile

## Attachment 1

### Responsible Party(ies) Legal Requirements/Obligations

#### REPORT/DATA REQUESTS

These reports/data are being requested pursuant to Division 7 of the California Water Code (Water Quality), Chapter 6.7 of Division 20 of the California Health and Safety Code (Underground Storage of Hazardous Substances), and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations (Underground Storage Tank Regulations).

#### ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (Local Oversight Program [LOP] for unauthorized releases from petroleum Underground Storage Tanks [USTs], and Site Cleanup Program [SCP] for unauthorized releases of non-petroleum hazardous substances) require submission of reports in electronic format pursuant to Chapter 3 of Division 7, Sections 13195 and 13197.5 of the California Water Code, and Chapter 30, Articles 1 and 2, Sections 3890 to 3895 of Division 3 of Title 23 of the California Code of Regulations (23 CCR). Instructions for submission of electronic documents to the ACEH FTP site are provided on the attached "Electronic Report Upload Instructions."

Submission of reports to the ACEH FTP site is in addition to requirements for electronic submittal of information (ESI) to the State Water Resources Control Board's (SWRCB) Geotracker website. In April 2001, the SWRCB adopted 23 CCR, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1 (Electronic Submission of Laboratory Data for UST Reports). Article 12 required electronic submittal of analytical laboratory data submitted in a report to a regulatory agency (effective September 1, 2001), and surveyed locations (latitude, longitude and elevation) of groundwater monitoring wells (effective January 1, 2002) in Electronic Deliverable Format (EDF) to Geotracker. Article 12 was subsequently repealed in 2004 and replaced with Article 30 (Electronic Submittal of Information) which expanded the ESI requirements to include electronic submittal of any report or data required by a regulatory agency from a cleanup site. The expanded ESI submittal requirements for petroleum UST sites subject to the requirements of 23 CCR, Division, 3, Chapter 16, Article 11, became effective December 16, 2004. All other electronic submittals required pursuant to Chapter 30 became effective January 1, 2005. Please visit the SWRCB website for more information on these requirements. ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](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, 7835, 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, 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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> July 25, 2012
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (petroleum UST 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 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 [.loptoxic@acgov.org](mailto:.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 <://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 [.loptoxic@acgov.org](mailto:.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.