



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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October 29, 2014

Arkansas Bandag Corporation  
PO Box 10048  
Fort Smith AR 72917

Mr. Mike Rogers  
ABF Freight Systems, Inc.  
PO Box 10048  
Fort Smith AR 72917  
(sent via electronic mail to [mkrogers@arkbest.com](mailto:mkrogers@arkbest.com))

Subject: Request for Work Plan; Site Cleanup Program Case No. RO0003134 and GeoTracker Global ID T00000005825, ABF Freight Maintenance Shop, 4575 Tidewater Avenue, Oakland, CA 94601

Dear Mr. Rogers:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site, including the *HVOC Delineation Investigation Report*, dated September 24, 2014. The report was prepared by the Trinity Source Group, Inc (Trinity). Thank you for the report. The results of the investigation yielded non-detectable HVOC concentrations in soil and groundwater and suggest that tetrachloroethene (PCE) is not laterally extensive in soil and groundwater beneath the maintenance building at the site. Although soil and groundwater concentrations appear limited, the source, and extent, of elevated sub-slab PCE vapor has not been defined and these are necessary actions in order to determine the next actions appropriate at the site.

Therefore, based on the review of the case file, ACEH requests that you address the following technical comments and send us the documents requested below.

### **TECHNICAL COMMENTS**

- 1. HVOC Data Gap Work Plan** – While the extent of PCE contamination in soil and groundwater appears limited, recent sub-slab vapor sampling beneath the maintenance building detected elevated concentrations of PCE at SVP-2 (up to 901 micrograms per cubic meter [ $\mu\text{g}/\text{m}^3$ ] PCE) that exceed the attenuated (using the default DTSC attenuation factor of 0.05) commercial indoor air Environmental Screening Levels (ESLs) promulgated by the San Francisco Bay Regional Water Quality Control Board (RWQCB). This data sample was confirmed by a passive soil gas sampling event that expanded the area of concern (SG-5 and SG-6). One passive location (SG-6) corresponded to previous subslab vapor point (SVP-2) that detected PCE vapor concentrations substantially above the indoor air ESLs promulgated by the RWQCB, and the Department of Toxic Substance Control (DTSC) modified indoor air screening levels of 2.1 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ). Because the two passive soil vapor samples (SG-5 and SG-6) detected similar results, ACEH assumes that the second location (SG-5) could contain similar PCE concentrations to SVP-2 if a subslab vapor point were to be installed in proximity to SG-5. ACEH noted that passive sample location SG-5 is in the vicinity of a floor drain that could be one potential source of subsurface PCE contamination at the site.

ACEH also notes that the soil bore which contained 3 inches of Light Non-Aqueous Phased Liquids (LNAPL; SB-4) was installed within what appears to be a PCE contamination core zone. This suggests that the PCE may be associated with the LNAPL, that removal of the LNAPL may assist in the removal of PCE contamination, and that a level of caution should be taken as the LNAPL is further evaluated.

Trinity has also stated that because the building is used for maintenance, and the roll-up doors on opposite sides of the building are generally open, that the potential vapor intrusion threat is considered low. However, because distribution of the PCE source area and extent remains undefined except by a sub-slab vapor cloud, it appears appropriate to undertake additional investigation and analysis.

Please be aware that the additional intent of this work is to collect sufficient additional data to either identify appropriate corrective actions at the site or to gather sufficient data to generate a health risk assessment that may support the general assessment of a low risk. Please also be aware that the DTSC states that all risk assessments and toxicological interpretations, conclusions, and recommendations be conducted by a professional with one of the following credentials:

- Certification as a Diplomat of the American Board of Toxicology, or
- Possession of a Master's Degree in Toxicology, Biochemistry, or Pharmacology, or a closely related specialty from an accredited college or university and three years of experience following the receipt of the Master's Degree in designing and managing toxicological studies, interpreting results, and conducting hazard and safety evaluations, or
- Possession of a Doctoral Degree in Toxicology, Biochemistry, or Pharmacology, or a closely related specialty from an accredited college or university and one years of experience following the receipt of the Master's Degree in designing and managing toxicological studies, interpreting results, and conducting hazard and safety evaluations.

Therefore, please submit a data gap work plan by the date identified below.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below, according to the following schedule:

- **January 9, 2015** – Data Gap Work Plan  
File to be named: RO3134\_WP\_R\_yyyy-mm-dd

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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address does not appear on the cover page of this notification, ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

If you have any questions, please call me at (510) 567-6876 or send me an electronic mail message at [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org).

Sincerely,

Mark E. Detterman, PG, CEG  
Senior Hazardous Materials Specialist

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

Mr. Mike Rogers  
RO0003134  
October 29, 2014, Page 3

cc: Debra Moser, Trinity Source Group, Inc, 119 Encinal Street, Santa Cruz, CA 95060  
(sent via electronic mail to [djm@tsgcorp.net](mailto:djm@tsgcorp.net))

Leroy Griffin, Oakland Fire Department 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (sent via electronic mail to [lgriffin@oaklandnet.com](mailto:lgriffin@oaklandnet.com))

Dilan Roe (sent via electronic mail to [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))

Mark Detterman (sent via electronic mail to [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))

Electronic File, GeoTracker

## **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/](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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> May 15, 2014
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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](mailto: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](mailto: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.