

ALAMEDA COUNTY  
**HEALTH CARE SERVICES  
AGENCY**

REBECCA GEBHART, Interim Director



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

April 24, 2017

Pacific Gas & Electric Company  
3401 Crow Canyon Road  
San Ramon, CA 94583  
Attn.: Anne Conner (*Sent via electronic mail to [apb1@pge.com](mailto:apb1@pge.com)*)

Subject: Work Plan Review; Site Cleanup Program Case No. RO0003196 and GeoTracker Global ID T10000008040, CNG Station, 205 Brush Street, Oakland, CA 94607

Dear Ms. Conner:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file and the recently submitted document entitled *Additional Investigation, In Situ Chemical Oxidation Pilot Study and Bench-Scale Testing Work Plan* (Work Plan) dated February 28, 2017 and prepared by Environmental Resources Management-West, Inc. (ERM) for the subject site. The Work Plan proposes to:

1. Address the four data gaps identified in previous phases of the investigation work, specified as:
  - A. The extent of lead in the shallow soil, to be addressed with the advancement of four shallow soil borings;
  - B. Collection of "consistent" soil vapor data results with the installation of five permanent soil vapor probes;
  - C. Conduct an onsite utility corridor study to identify potential preferred pathways for vapor migration; and
  - D. Collection of repeatable groundwater data within the impacted shallow groundwater interval, which will be addressed by the installation of five shallow groundwater monitoring wells.
2. Conduct an in situ chemical oxidation (ISCO) pilot study to begin total petroleum hydrocarbon (TPH) and associated volatile organic compound (VOC) mass removal by means of 37 reagent injection points; and
3. Conduct a bench-scale test to evaluate the treatability options for dissolved metals by means of testing three reagent formulations at dosages.

Based on ACDEH staff review of the referenced document and of the case file, we generally concur with the recently proposed scope of work addressed in Item 1 above addressing the identified data gaps, provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. While the comments below request additional soil bore(s), submittal of a revised Work Plan is limited to a revised Figure 2-2 unless an alternate scope of work outside that described in the data gap investigation portion of the Work Plan and technical comments below is proposed. We request that you address the following technical comments, submit the requested document, and upon ACDEH approval, 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](mailto:keith.nowell@acgov.org)) prior to the start of field activities.

## **TECHNICAL COMMENTS**

**Item 1A** – ACDEH is in general agreement with the proposed number of soil bores, sample locations and sample depths as presented in the Work Plan.

**Item 1B** – ERM states that the VOCs tetrachloroethene (PCE) and benzene were detected at concentrations above their respective ESL; however, the Work Plan does not propose soil vapor sample collection in the vicinity of SVP-3, the soil bore with the benzene exceedance. The rationale presented in the Work Plan is that the location of the benzene concentration exceedance is close to the former underground storage tank (UST) location. As indicated above, ERM states the purpose of the Work Plan includes collection of “consistent” soil vapor data results. Therefore, ACDEH is of the opinion that permanent soil vapor point(s) be advanced in the vicinity of SVP-3. The point(s) may be used to monitor the effectiveness of the proposed ISCO pilot study proposed in Item 2 above, should ISCO be performed. Please submit, by the date specified below, an Addendum to the Work Plan, consisting of a revised Figure 2-2 depicting additional soil vapor probe location(s) for the benzene exceedance.

Note that due to above normal precipitation this season, elevated groundwater conditions may exist at the site. ACDEH recommends observing the SVP boreholes for groundwater prior to probe placement.

ERM states The soil vapor probes will be installed consistent with *Advisory – Active Soil Gas Investigations* (California Environmental Protection Agency, Department of Toxic Substances Control [DTSC], Los Angeles Regional Water Quality Control Board, and San Francisco Regional Water Quality Control Board, 2015) (Advisory). The soil vapor samples will be analyzed for VOCs by EPA Test Method TO-15 and oxygen, methane, and carbon dioxide by ASTM D-1946. In accordance with the Advisory, ACDEH requests naphthalene concentrations be confirmed by EPA Test Method TO-17. Please perform the TO-17 analysis on half the number of samples collected, in addition to the TO-15 analysis. Please include total petroleum hydrocarbons (TPH) as gasoline (TPHg) in the analysis scope. Additionally, ACDEH requests the tracer gas be included in the scope of analysis.

**Item 1C** – ACDEH is in general agreement with the proposed onsite utility corridor study. In previous communications ACDEH staff have been informed the site may be redeveloped. Based on the findings of this study, additional soil vapor samples may be collected which may result in trench dams in future utility corridors to discourage the migration of soil vapors into the sub-slab areas beneath structures.

**Item 1D** – ACDEH is in general agreement with the proposed locations and number of groundwater monitoring wells. Due to the recent precipitation, ACDEH recommends establishing the depth to groundwater prior to well construction in order to prevent submerged well screens. Please note the proposed well construction will allow for monitoring of the shallow water bearing zone. Contamination of a deeper water bearing zone has been documented beneath the site.

As reported by ERM in the Work Plan, site investigations to date have indicated that the site soil is impacted by TPH, VOCs, semi-volatile organic compounds (SVOCs), organochlorine (OC) pesticides, polychlorinated biphenyls (PCBs), and some metals. Therefore, ACDEH requests that these chemicals be included in the analysis scope for the initial groundwater

monitoring event conducted at the site. A decision on the analysis scope for future events may be made following a review of the laboratory analysis report.

**Item 2** – ACDEH staff is of the opinion that an ISCO program is premature and that a Feasibility Study/Corrective Action Plan (FS/CAP) prepared in accordance with Title 23, California Code of Regulations, Section 2725 appears warranted. The FS/CAP must include a concise background of soil and groundwater investigations performed in connection with this case and an assessment of the residual impacts of the chemicals of concern (COCs) for the site and the surrounding area where the unauthorized release has migrated or may migrate. The FS/CAP should also include, but is not limited to, a detailed description of site lithology, including soil permeability, and most importantly, contamination cleanup levels and cleanup goals, in accordance with the San Francisco Regional Water Quality Control Board (SFRWQCB) Basin Plan and appropriate ESL guidance for all COCs and for the appropriate groundwater designation. Please note that soil cleanup levels should ultimately (within a reasonable timeframe) achieve water quality objectives (cleanup goals) for groundwater in accordance with the SFRWQCB Basin Plan. Please specify appropriate cleanup levels and cleanup goals in accordance with 23 CCR Section 2725, 2726, and 2727 in the FS/CAP.

The FS/CAP must evaluate at least three viable alternatives for remedying or mitigating the actual or potential adverse effects of the unauthorized release(s) besides the 'no action' and 'monitored natural attenuation' remedial alternatives. Each alternative shall be evaluated not only for cost-effectiveness but also its timeframe to reach cleanup levels and cleanup goals. ACDEH requests submittal of the FS/CAP by the date specified below.

**Item 3** – As indicated in the Technical Comment addressing Item 2 above, ACDEH staff is of the opinion that a bench-scale test to evaluate the treatability options for dissolved metals is premature and should be addressed in the FS/CAP requested above.

### **SUBMITTAL ACKNOWLEDGEMENT STATEMENT**

Please note that ACDEH has updated its 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 this and future submittals to ACDEH.

### **TECHNICAL REPORT REQUEST**

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

- **April 25, 2017 – Work Plan Addendum (Revised Figure 2-2)** (Provided to ACDEH, Attn.: Keith Nowell as an electronic mail attachment)

- **July 24, 2017** – Feasibility Study/ Corrective Action Plan (file to be named: RO0003196\_FEASSTUD\_R\_yyyy-mm-dd)
- **90 Days After Work Plan Addendum Approval** – Soil and Groundwater Investigation Report (file to be named: RO0000253\_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](mailto:keith.nowell@acgov.org).

Sincerely,

Keith Nowell, PG, CHG  
Hazardous Materials Specialist

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

cc: Ben LePage, Pacific Gas & Electric Company, 3401 Crow Canyon Road, San Ramon, CA 94583  
(sent via electronic mail to [Ben.LePage@pge.com](mailto:Ben.LePage@pge.com))

John Lucio, Project Manager, Environmental Resources Management, 1277 Treat Boulevard, Suite 500, Walnut Creek, CA (sent via electronic mail to [john.lucio@erm.com](mailto:john.lucio@erm.com))

Arun Chemburkar, Project Manager, Environmental Resources Management, 1277 Treat Boulevard, Suite 500, Walnut Creek, CA (sent via electronic mail to [arun.chemburkar@erm.com](mailto:arun.chemburkar@erm.com))

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

Paresh Khatri (sent via electronic mail to [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org))

Keith Nowell, (sent via electronic mail to [keith.nowell@acgov.org](mailto:keith.nowell@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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) 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 File Transfer Protocol (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 SCP 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 ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)) for more information on these requirements.

#### 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 ACDEH's FTP server and the SWRCB's GeoTracker website." 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 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. 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 case meet this requirement. 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

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> December 1, 2016
	<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; May 15, 2014, November 29, 2016
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions


The Alameda County Environmental Cleanup Oversight Programs (LOP 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 acknowledgement 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) Open File Explorer using the Windows  key + E keyboard shortcut.
    - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
  - b) On the address bar, type in ftp://alcoftp1.acgov.org.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
  - d) Click Log On.
  - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - f) 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.