

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
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September 28, 2017

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

Subject: File 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 documents entitled *Additional Investigation- Monitoring Well and Soil Vapor Installation Summary Report (SWI)*, dated August 4, 2017, and *In Situ Chemical Oxidation Pilot Study Implementation Report (REM)*, dated August 29, 2017. Both documents were prepared by Environmental Resources Management (ERM) for the subject site.

The SWI includes documentation of activities, sampling, and analysis associated with the installation of five on-site groundwater monitoring wells and six permanent on-site soil vapor probes. Additionally, the SWI documents the findings of a utility corridor search to evaluate site conditions for preferential pathways that may potentially short-circuit the soil vapor investigation.

The REM documents the activities and testing associated with an in situ chemical oxidation (ISCO) pilot test using the proprietary chemical oxidant KLOZUR®CR. KLOZUR®CR was injected into the subsurface through 37 injection points to a depth of between 8 and 16 feet below the ground surface (bgs). The purpose of the pilot test is to evaluate the effectiveness of ISCO as a remedial alternative for petroleum hydrocarbons. Following its evaluation of the ISCO effectiveness, ERM will prepare a feasibility study/ remedial action plan (FS/RAP) reviewing remedial technology options for site cleanup.

As documented in the REM, a separate phase of the pilot test included a bench test to evaluate and address the potential mobilization of metals in the subsurface due the application of KLOZUR®CR. As part of its response to the potential mobilization, ERM has implemented an increased frequency of groundwater sampling to monitor metals concentrations relative to their respective pre-application baseline concentrations.

Our review of the aforementioned documents indicates that the State Water Resource Control Board's (SWRCB) Geotracker database is not complete, thus rendering the site to a non-compliant status pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3890 to 3895. ACDEH requests that you address the following technical comments and submit the requested information by the dates specified below.

TECHNICAL COMMENTS

1. *Additional Investigation- Monitoring Well and Soil Vapor Installation Summary Report* missing documentation includes:

- EDF files - Analytical data for soil, water, and vapor samples collected for the purpose of subsurface investigation or remediation. ACDEH requests submittal of the soil, groundwater, and soil vapor analyses data conducted for this investigation;
 - GEO_BORE files - Stand-alone boring logs (with depth to the screened interval and the length of screened interval for any permanent monitoring well installed). ACDEH requests submittal of bore logs for SB-32, SB-33, and SB-34; GSB-1, GSB-2, and GSB-3; the monitoring well bore log-well construction diagrams for MW-01 through MW-05; and soil vapor probes SV-1 through SV-6;
 - GEO_WELL file- Depth-to-water information for permanent sampling points whenever the data is collected, even if the well is not sampled during the sampling event;
 - GEO_MAP files - Stand-alone site maps displaying tank locations, streets bordering the facility, and sampling locations for all soil, water and vapor samples. ACDEH requests submittal of report figures Figure 3 through Figure 8 as associated GEO_MAP(s);
 - GEO_XY file - The latitude and longitude of any permanent monitoring well for which data is reported in EDF format. ACDEH requests submittal of the location file for monitoring wells MW-01 through MW-05 and soil vapor probes SV-1 through SV-6;
 - GEO_Z file - The surveyed elevation measurements to the top of well casings for the wells and probes referenced above.
2. *In Situ Chemical Oxidation Pilot Study Implementation Report* missing documentation:
- EDF file - Analytical data for soil, water and vapor samples collected for the purpose of subsurface investigation or remediation. ACDEH requests submittal of the analyses conducted for this investigation;
 - GEO_WELL file - Depth-to-water information for permanent sampling points whenever the data is collected, even if the well is not sampled during the sampling event;
 - GEO_MAP file - Stand-alone site maps displaying tank locations, streets bordering the facility, and sampling locations for all soil, water and vapor samples. Please submit report Figure 2 as the associated GEO_MAP.

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 SWRCB GeoTracker website, in accordance with the following specified file naming convention and schedule:

- **October 19, 2017 – Electronic Submittal of Information** (GeoTracker submittals including EDFs, GEO_BOREs, GEO_WELLs, GEO_MAPs, GEO_XY, and GEO_Z)
- **October 19, 2017 – List of Documents Submitted to GeoTracker** (provided via electronic mail to ACDEH, Attention: Keith Nowell)
- **October 27, 2017 – Third Quarter 2017 Groundwater Monitoring Report** (file to be named: RO0003196_GWM_R_yyyy-mm-dd)
- **TBD - Feasibility Study/ Remedial Action Plan** (file to be named: RO0003196_FSCAP_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
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)

John Lucio, Project Manager, Environmental Resources Management, 1277 Treat Boulevard, Suite 500, Walnut Creek, CA (sent via electronic mail to 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)

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

Paresh Khatri (sent via electronic mail to paresh.khatri@acgov.org)

Keith Nowell, (sent via electronic mail to 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/) 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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 1, 2016
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: 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.
 - 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 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.