

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
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February 14, 2017

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& Bradley Hirst et al.
c/o Equity Enterprises
4460 Black Avenue, Suite L
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(Sent via email to brad@equityenterprises.net)

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915 Main Street
Pleasanton, CA 94566-8218

C & H Development Co
Bradley A. and Sandra L Hirst, Trustees
43 Panoramic Way
Walnut Creek, CA 94595-1605

Autogal, Inc.
Agent: The Prentice-Hall Corporation System, Inc.
2711 Centerville Road Suite 400
Wilmington, DE 19808

Subject: Work Plan Request for Fuel Leak Case No. RO0003199 and GeoTracker Global ID T1000008158,
Main Street Property, 927 Main Street, Pleasanton, CA 94566

Dear Responsible Parties:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file, including the October 10, 2016, report titled "Soil and Groundwater Investigation Report," (Report) submitted by Environmental Risk Assessors. The Report documents the following: the advancement of two soil borings at the site from which a total of five soil samples and two grab groundwater samples were collected; the advancement of one soil gas sampling point at the site; and the advancement of one soil boring at 915 Main Street, Pleasanton, the property that adjoins the subject site to the south and the west. The soil and groundwater samples were analyzed for the following: Total Petroleum Hydrocarbons as gasoline (TPH-g), diesel (TPH-d), and Stoddard Solvent (TPH-ss); benzene, toluene, ethylbenzene, and total xylenes (BTEX); methyl *tert*-butyl ether (MtBE); and naphthalene. The soil gas sample was analyzed for oxygen, methane, and naphthalene. The Report also presents in Appendix H the results of a geophysical survey that was performed using ground penetrating radar (GPR) on March 25, 2016, and discussed in a report titled "Geophysical Survey," dated March 30, 2016, and submitted by CBRE, Inc. The results of the survey, in which the GPR achieved depths between 3.5 feet and 4 feet bgs, appear to indicate that underground storage tanks (USTs) are not present at the subject site, the property at 915 Main Street that adjoins the subject site to the south and the west, and the property that adjoins the subject site to north extending to the northern railroad tracks. The Report also includes a preliminary Site Conceptual Model (SCM) and a comparison of the site data to the criteria under the State Water Resources Control Board's Low-Threat Underground

Storage Tank Case Closure Policy (LTCP). The Report recommends additional groundwater sampling from the area south and southwest of the Site to evaluate the potential source(s) for TPH in groundwater beneath the Site, and additional soil gas sampling at boring SB-5 due to the detection of naphthalene in groundwater at a concentration of 19 µg/L.

ACDEH has evaluated the data presented in the report. Further work is required to determine the extent of the contamination to help facilitate closure of site under the LTCP. We request the submittal of a site investigation Work Plan that addresses the technical comments discussed below.

TECHNICAL COMMENTS

1) LTCP General Criteria Compliance

- a. **General Criteria f (Secondary Source).** The Report states that the likelihood of the presence of significant petroleum hydrocarbon secondary source in soil appears low and that TPH in groundwater appears localized to the southeastern corner of the building that is onsite. However, based on ACDEH's review of the case file, secondary source as petroleum-impacted soil and groundwater has not been adequately delineated at the site. In addition, further investigation to identify secondary sources and residual contamination is appropriate due to the presence of the historic gas and oil facility at the site and the other gas and oil facility straddling both the site and the adjacent property at 915 Main Street, as indicated on the 1943 and 1953 Sanborn maps.
- b. **General Criteria e (Site Conceptual Model).** The Report references a water well survey that was performed in 2010 by the consultant for the former Mobile gasoline service station located approximately 200 feet northeast of the site. The survey used records from the California Department of Water Resources (DWR) and Alameda County Public Works Agency (ACPWA). ACDEH recommends that an updated well survey be performed in order to capture more potential recently installed water wells in the area of concern.

2) LTCP Media-Specific Criteria Compliance

- a. **Groundwater.** As stated in the Report, benzene and MtBE have not been detected in groundwater at the site, and it appears based on available data so far that there are not plumes of these constituents. However, the TPH-g plume boundary, which is discussed in the Report, has not been adequately defined at its northwest, southwest, east and southeast extent. As above, we recommend further groundwater investigation. The site cannot meet the media-specific criteria until secondary source areas have been defined and it has been verified to have been removed to the extent practicable. Also, as discussed above, we request an updated well survey to better determine whether or not the site meets the LTCP criteria for groundwater.
- b. **Vapor Intrusion to Indoor Air.** The Report recommends that an additional soil gas sample be collected at boring SB-5 to evaluate the potential for vapor intrusion due to naphthalene detection in groundwater at this boring. Because depth to water is deep at this site, ACDEH does not determine this to be necessary at this time. Because secondary source in soil and groundwater has not yet been adequately defined, we recommend instead, as discussed above, that further soil and groundwater investigation be performed to better define the extent of secondary source and determine the potential need for vapor sampling at these locations before performing additional soil gas sampling at this time.

- c. **Direct Contact and Outdoor Air Criteria for Soil.** Because secondary source or residual sources have not been adequately defined, it cannot be determined at this time whether or not the site meets this criteria. As discussed above, we recommend further soil sampling which, in addition to defining secondary source, will also help to provide additional data to determine if the site meets the media-specific criteria for direct contact and outdoor air exposure to soil.

3) Other Comments

- a. **Figures.** ACDEH requests that the site map figures in the requested Work Plan and subsequent reports present a perpendicular overhead view of the site to enable more accurate interpretation of sampling locations in relation to the building footprints and site boundary. In addition, please include scales on all maps.
- b. **Logs of Borings.** ACDEH reviewed the logs for borings SB-2 and SB-3, which according to figures in the Report, are immediately adjacent to each other. We note a discrepancy between both logs in the geological material documented for approximately the upper 20 feet. In contrast to the boring log for SB-3, the log for SB-2 identifies the upper 20 feet as "fill". Please address the discrepancy. The additional advancement of boring(s) in this area may be necessary to provide clarification of the type of geological material. Additional boring(s) would also help to clarify the discrepancies between SB-2 and SB-3 in the concentrations of TPH found in groundwater. Given that soil was sampled shallowly at SB-2, ACDEH recommends, in addition to TPH-g, TPH-d, TPH-mo, BTEX, MtBE, and naphthalene, that soil samples be analyzed for volatile organic compounds (VOCs) using Method 8260.

- 4) **GeoTracker Compliance.** A review of the State Water Resources Control Board's (State Water Board) GeoTracker website indicates that required files, including electronic data files for laboratory analytical data, boring logs, and site maps for investigative work performed for this site have not been uploaded onto GeoTracker. Because this is a state requirement, ACDEH requests that all the above requested data be uploaded to GeoTracker by **March 15, 2017**.

Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the State Water Board GeoTracker system via the internet. Also, beginning January 1, 2002, 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 to sub-meter accuracy using NAD 83. A California licensed surveyor may be required to perform this work. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs, including SCP programs. Additionally, pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3893, 3894, and 3895, beginning July 1, 2005, the successful submittal of electronic information (i.e. report in PDF format) shall replace the requirement for the submittal of a paper copy. Please upload all required submittals to GeoTracker. Electronic reporting is described below on the attachments.

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 that is to be 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 and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the State Water Resource Control Board's GeoTracker website."

Please include this in your submittals to ACDEH.

TECHNICAL REPORT REQUEST

Please upload the work plan to the ACDEH ftp site (Attention: Anne Jurek), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **March 15, 2017 (30 days)**– GeoTracker Compliance
- **April 14, 2017 (60 days)**– Site Investigation Work Plan
File to be named: WP_R_yyyy-mm-dd RO3199

This report is 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.

If you have any questions, please call me at (510) 567-6721 or send me an electronic mail message at anne.jurek@acgov.org. Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>

Sincerely,

Anne Jurek, MS, California GIT 731
Professional Technical Specialist II

Attachment: Responsible Party(ies) Legal Requirements/Obligations
Enclosure: ACDEH Electronic Report Upload (ftp) Instructions

cc: Lita Freeman, Environmental Risk Assessors, 1420 East Roseville Parkway, Roseville, CA 95661 (Sent via E-mail to: litafreeman@gmail.com)

Anne Jurek, ACDEH (Sent via E-mail to: anne.jurek@acgov.org)

Dilan Roe, ACDEH (Sent via E-mail to: dilan.roe@acgov.org)

Paresh Khatri, ACDEH (Sent via E-mail to: paresh.khatri@acgov.org)

GeoTracker, eFile

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 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.