

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  
ALAMEDA, CA 94502  
(510) 567-6700  
FAX (510) 337-9335

August 29, 2017

Atlantic Richfield Company  
(A BP Affiliated Company)  
P.O. Box 1257  
San Ramon, CA 94583  
Attn: Paul Supple  
(Sent via electronic mail to:  
[paul.supple@bp.com](mailto:paul.supple@bp.com))

ConocoPhillips  
76 Broadway  
Sacramento, CA 95818  
Attn: Ed Ralston  
(Sent via electronic mail to:  
[Ed.C.Ralston@p66.com](mailto:Ed.C.Ralston@p66.com))

Rajinder S & Sukhvinder Sull  
2004 Hartnell Street  
Union City, CA 94587  
(Sent via electronic mail to:  
[rsunion76@aol.com](mailto:rsunion76@aol.com))

Subject: Conditional Approval of Work Plan Addendum, Fuel Leak Case No. RO0000014 and GeoTracker Global ID T0600100213, BP #11132, 3201 35<sup>th</sup> Avenue, Oakland, CA 94619

Dear Responsible Parties:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the recently submitted work plan addendum entitled *Revised Figures with Comments* (WPA) dated August 28, 2017 and prepared by Arcadis U.S., Inc. (Arcadis) for the subject site. The WPA was prepared at the request of ACDEH in our letter dated August 21, 2017.

The WPA presents proposed soil vapor well locations, depicted on revised Figure 2 and the locations of two off-site groundwater monitoring wells, locations of which are depicted on the revised Figure 9. In addition to the revised locations, the WPA is proposing collecting soil vapor samples from a single depth in each of the soil vapor well locations in lieu of a two-well cluster.

Based on ACDEH staff review of the referenced document and of the case file, we generally concur with the recently proposed scope of work provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. We request that you address the following technical comments, 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) and to [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org)) prior to the start of field activities.

**TECHNICAL COMMENTS**

1. Vapor Intrusion Along 35<sup>th</sup> Avenue – ACDEH generally concurs with the proposed soil vapor well locations as presented in the WPA. Please provide documentation of the vapor well installation and sampling in the Vapor Intrusion Evaluation Report requested below. Note that semi-permanent sampling locations are required to be surveyed and the location data submitted to the State Water Resources Control Board's (SWRCBs) GeoTracker website.
2. Vapor Intrusion along Suter Street – In order to better access the potential impacts to the residence located at 3125 35<sup>th</sup> Avenue, ACDEH requests the relocation of SV-4 approximately 20 feet to the northwest and the relocation of SV-5 approximately 15 feet the southeast
3. Vapor Probe Soil Sampling – ACDEH generally concurs with the proposed sampling depths as presented in the WPA.

4. Groundwater Monitoring Well Locations – ACDEH generally concurs with the proposed groundwater monitoring well locations as presented in the WPA. Please provide documentation of the well installation and sampling in the Groundwater Monitoring Well Installation Report requested below. As discussed above, semi-permanent well sampling locations are required to be surveyed and the location data submitted to the SWRCBs GeoTracker website.
5. Off-site Irrigation Well – ACDEH generally concurs with the proposed investigation outlined in the in the WPA for the possible presence of a well on Arkansas Street. ACDEH requests the presentation of the findings of the off-site well investigation in the Groundwater Monitoring Well Installation Report requested below.

#### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACDEH FTP site (Attention: Keith Nowell), and to the SWRCBs GeoTracker website, in accordance with the following specified file naming convention and schedule:

- **October 13, 2017 – Electronic Submittal of Information** (GEO\_XY and GEO\_Z file submittals)
- **October 30, 2017 – Vapor Intrusion Evaluation Report** (file name: RO0000014\_SWI\_R\_yyyy-mm-dd)
- **October 30, 2017 – Groundwater Monitoring Well Installation Report** (file name: RO0000014\_GWM\_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 and Electronic Report Upload (FTP) Instructions

cc: Megan Smoley, Arcadis U.S. Inc., 100 Montgomery Street, 7051 Fain Park Drive, Suite 119, Montgomery, AL 36117 (*Sent via electronic mail to: [Megan.Smoley@arcadis-us.com](mailto:Megan.Smoley@arcadis-us.com)*)

Dilan Roe, ACDEH, (*Sent via electronic mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org)*)  
Paresh Khatri, ACDEH, (*Sent via electronic mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org)*)  
Keith Nowell, ACDEH (*Sent via electronic mail to: [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org)*)

GeoTracker, File

## 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.