



April 5, 2018

Mr. and Mrs. Neil and Mary Cotter  
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(Sent via E-mail to: [neil.cotter@comcast.net](mailto:neil.cotter@comcast.net) and  
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Mr. and Mrs. John and Antoinette Coyle  
2193 Trafalgar Place  
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(Sent via E-mail to: [trisargil@aol.com](mailto:trisargil@aol.com))

Subject: Request for Well Decommissioning for Expedited Claim Account Pilot Program (ECAP), Underground Storage Tank (UST) Claim #13712, Fuel Leak Case No. RO000027 and GeoTracker Global ID T06000102106, Grove Street Wash Rack, 3884 Martin Luther King, Jr. Way, Oakland, CA 94609

Ladies and Gentlemen:

Alameda County Department of Environmental Health (ACDEH) is considering closure for the above referenced fuel case. ACDEH requests that you address the following technical comments, perform the work, and submit the documents requested below by the associated compliance dates. Upon completion of the public comment period and receipt of the requested documents, ACDEH will close the case and issue a Remedial Action Completion Certificate (RACC).

#### Technical Comments:

- 1. Request for Well Destruction:** The public notification period ended on March 31, 2018 and since no comments were received, you may now schedule the destruction of all wells, including groundwater monitoring wells, soil vapor wells, extraction wells, etc., located both on- and off-site. Please obtain well destruction permits from Alameda County Public Work Agency (ACPWA), and provide ACDEH 72 hours' notice of the well destruction. Upon completion of well destruction, please submit a *Well Decommissioning Report*, including all permits and signed profile and signed disposal documentation of the waste (both well destruction and remaining site waste) according to the schedule provided below in the Technical Report Request.
- 2. Geotracker Compliance Request:** A review of the case file indicates that the SWRCB Geotracker database and/or the ACDEH 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. Non-compliance with Geotracker will delay issue of the RACC. At present missing data and documents include, but may not be limited to:
  - Complete copies of reports, in pdf format, including the signed transmittal letter and professional certification (GEO\_REPORT files); notably missing from Geotracker is the signed disposal documentation for the additional drum of waste generated during the July 2017 investigation described in the Section 3.4, *Waste Disposal*, of the September 13, 2017 *Data Gap Investigation Report* prepared and submitted on your behalf by ERM.
  - Analytical data for soil, water and vapor samples collected for the purpose of subsurface investigation or remediation, including influent/effluent water samples from remediation systems (EDF files); notably missing from Geotracker are the soil vapor sample results collected during the March 2017 investigation;

- Surveyed elevation measurements to the top of well casings (GEO\_Z files);
- The latitude and longitude (GEO\_XY files) of any permanent monitoring well for which data is reported in EDF format;
- 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\_WELL files);
- Stand-alone site maps displaying tank locations, streets bordering the facility, and sampling locations for all soil, water and vapor samples (GEO\_MAP files); notably missing from Geotracker are site figures showing the locations of soil bores/soil vapor points installed during the February and July 2017 investigations, respectively;
- Stand-alone boring logs with depth to the screened interval and the length of screened interval for any permanent monitoring well installed (GEO\_BORE files); notably missing from Geotracker are the five boring logs and the five soil vapor points installed in February 2017, and soil vapor points SV-1A, SV-2A, and SV-4A installed in July 2017.

Please upload the above missing data and any other missing data to GeoTracker by the date specified below. See Attachment 1 and the State's GeoTracker website for further details.

#### **TECHNICAL REPORT REQUEST**

Please submit the following documents to Geotracker website, in accordance with the following specified file naming convention and schedule. ACDEH requests e-mail notification to [karel.detterma@acgov.org](mailto:karel.detterma@acgov.org) of the documents uploaded to Geotracker.

- **April 20, 2018** - GeoTracker electronic submittal date.
- **May 11, 2018** – Well Destruction Report  
File to be named: RO000027\_WELL\_DCM\_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.

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 567-6708 or send me an electronic mail message at [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org).

Sincerely,

Karel Detterman, PG 5628  
Senior Hazardous Materials Specialist

cc: Giorgio Molinario, ERM, 1277 Treat Boulevard, Suite 500, Walnut Creek, CA 94597 (Sent via e-mail to: [Giorgio.Molinario@erm.com](mailto:Giorgio.Molinario@erm.com))

Belinda Butler-Veytia, ERM, (Sent via e-mail to: [Belinda.Butler-Veytia@erm.com](mailto:Belinda.Butler-Veytia@erm.com))

Alexandra Foote, Law Offices, (Sent via e-mail to: [alexandra@weinberg-gonser.com](mailto:alexandra@weinberg-gonser.com))

Kyle Cockerham, SWRCB, (Sent via e-mail to: [Kyle.Cockerham@waterboards.ca.gov](mailto:Kyle.Cockerham@waterboards.ca.gov))

Caryl Sheehan, SWRCB, (Sent via e-mail to: [Caryl.Sheehan@Waterboards.ca.gov](mailto:Caryl.Sheehan@Waterboards.ca.gov))

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

Karel Detterman, ACDEH (Sent via E-mail to: [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org))

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

Electronic File, GeoTracker

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| <b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b> | <b>REVISION DATE:</b> December 14, 2017  |
|  | <b>ISSUE DATE:</b> July 25, 2012   |
|  | <b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016 |
| <b>SECTION:</b> ACDEH Procedures   | <b>SUBJECT:</b> Responsible Party(ies) Legal Requirements / Obligations        |

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO\_MAP, GEO\_XY, GEO\_Z, GEO\_BORE, GEO\_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/))

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values<sup>1</sup> as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

**GeoTracker Upload Table Example**

| Report Title                                | Sample Period | PDF Report | GEO_MAPS | Sample ID | Matrix | GEO_Z                    | GEO_XY                   | GEO_BORE                 | GEO_WELL                 | EDF                      |
|---|---------------|------------|----------|-----------|--------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <b>2016 Subsurface Investigation Report</b> | 2016 S1       | ✓          | ✓        | Effluent  | SO     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ✓                        |
| <b>2012 Site Assessment Work Plan</b>       | 2012          | ✓          | ✓        |           |        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <b>2010 GW Investigation Report</b>         | 2008 Q4       | ✓          | ✓        | SB-10     | W      | ✓                        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ✓                        |
|   |               |            |          | SB-10-6   | SO     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ✓                        |
|   |               |            |          | MW-1      | WG     | ✓                        | ✓                        | ✓                        | ✓                        | ✓                        |
|   |               |            |          | SW-1      | W      | ✓                        | ✓                        | ✓                        | ✓                        | ✓                        |

<sup>1</sup> GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

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| <b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b> | <b>REVISION DATE:</b> NA   |
|  | <b>ISSUE DATE:</b> December 14, 2017   |
|  | <b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016 |
| <b>SECTION:</b> ACDEH Procedures   | <b>SUBJECT:</b> Responsible Party(ies) Legal Requirements / Obligations        |

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 the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

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 and include the professional registration stamp, signature, and statement of professional certification. 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

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: [https://www.waterboards.ca.gov/water\\_issues/programs/ustcf/](https://www.waterboards.ca.gov/water_issues/programs/ustcf/)

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.