ALAMEDA COUNTY HEALTH CARE SERVICE AGENCY

COLLEEN CHAWLA, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH LOCAL OVERSIGHT PROGRAM (LOP) For Hazardous Materials Releases 1131 HARBOR BAY PARKWAY, SUITE 250 ALAMEDA, CA 94502 (510) 567-6700 FAX (510) 337-9335

April 19, 2018

Mr. Pritpaul Sappal Alaska Gas 2718 Washburn Court Vallejo, CA 94591

(Sent by e-mail to: sappalp@yahoo.com)

Subject: Expedited Claim Account Pilot Program (ECAP), UST Claim #15262, Fuel Leak Case

RO0000127 and Geotracker Global ID T0600101804, Alaska Gasoline 6211 San Pablo

Avenue, Oakland, CA 94608

Dear Mr. Sappal:

Thank you for submitting the *Phase I Scope of Work* by e-mail on April 18, 2018. The *Phase I Scope of Work* was requested during the first Joint Execution Team (JET) conference call on March 30, 2018 with Alameda County Department of Environmental Health (ACDEH) and Underground Storage Tank Cleanup Fund (USTCF) staff and requested in ACDEH's April 13, 2018 Directive Letter. The purpose of the call was to introduce the JET team members, discuss the ECAP process, discuss ACDEH and USTCF staff review of the State Water Resources Control Board's Low Threat Closure Policy (LTCP) criteria, and identify additional data collection and assessment required to advance the case to closure.

The *Phase I Scope of Work* is approved. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or the technical comment is proposed. We request that you perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: karel.detterman@acgov.org) prior to the start of field activities.

As requested in ACDEH's April 13, 2018 Directive Letter, please prepare summary tables and figures presenting findings of the foundation and sump survey (by address), the utility survey and MW-7 data. Please submit the tables and figures to the JET via email correspondence by the following date.

Following submittal of tables and figures of *Phase I Scope of Work*, the JET will meet to discuss the findings. Based on the findings the JET will determine the next phase of soil, soil vapor and grab groundwater data collection to delineate the dissolved phase and free product plume, and evaluate vapor intrusion risk to offsite properties. The grab groundwater data may provide information on whether shallow soil gas probes are needed downgradient near residences where water/gas/sewer lines enter the property.

TECHNICAL REPORT REQUEST

Please upload the following technical report to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

May 18, 2018 Phase I Scope of Work Tables and Figures
 File to be named: RO127 MISC R yyyy-mm-dd

Mr. Pritpaul Sappal RO0000127 April 19, 2018, Page 2

This report is being requested pursuant to California Health and Safety Code Section 25296.10. Title 23 of the California Code of Regulations Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum underground storage 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 send me an e-mail message at karel.detterman@acgov.org or call me at (510) 567-6708.

Sincerely,

Karel Detterman, PG Senior Hazardous Materials Specialist

Enclosures: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations

cc: Scott Bittinger, PG, Stratus Environmental, 3330 Cameron Park Drive, Suite 550, Cameron Park, CA 95682 (Sent via E-mail to: SBittinger@stratusinc.net)

Gowri Kowtha, PE, Stratus Environmental, 3330 Cameron Park Drive, Suite 550, Cameron Park, CA 95682 (Sent via E-mail to: GKowtha@stratusinc.net)

Galvin Kauffman, State Water Resources Control Board, Underground Storage Tank Cleanup Fund (Sent via E-mail to: <u>Galvin.Kauffman@Waterboards.ca.gov</u>)

Caryl Sheehan, State Water Resources Control Board, Underground Storage Tank Cleanup Fund (Sent via E-mail to: Caryl.Sheehan@Waterboards.ca.gov)

Dilan Roe, ACDEH, Chief – Land Water Division (Sent via E-mail to: dilan.roe@acgov.org)
Paresh Khatri, ACDEH, LOP Supervisor (Sent via E-mail to paresh.khatri@acgov.org)
Karel Detterman, ACDEH, Primary Caseworker (Sent via E-mail to: karel.detterman@acgov.org)

GeoTracker, Electronic Case File

Attachment 1

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) REVISI ISSUE PREVIC

REVISION DATE: December 14, 2017

ISSUE DATE: July 25, 2012

PREVIOUS REVISIONS: September 17, 2013, May

15, 2014, December 12, 2016

SUBJECT: Responsible Party(ies) Legal

Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

SECTION: ACDEH Procedures

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, Division3, 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/)

- 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 values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sampl e Period	PDF Report	GEO_ MAPS	Sample ID	Matrix	GEO _Z	GEO _XY	GEO_ BORE	GEO_WEL L	EDF
2016 Subsurface Investigation Report	2016 S1	√	√	Effluent	SO					√
2012 Site Assessment Work Plan	2012	✓	✓							
2010 GW Investigation	2008 Q4	✓	√	SB-10	W	✓				✓
Report				SB-10-6	SO					✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	√	✓

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

Attachment 1

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) SECTION: ACDEH Procedures REVISION DATE: NA ISSUE DATE: December 14, 2017 PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016 SUBJECT: 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/

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.