



March 15, 2018

Mr. Matthew Westbrook
ARC - Blue Print Service
945 Bryant Street
San Francisco, CA 94103
(Sent via electronic mail to:
matthew.westbrook@e-arc.com)

Mr. Jeffery Grimes
ARC - Blue Print Service
945 Bryant Street
San Francisco, CA 94103
(Sent via electronic mail to:
jeffery.grimes@earc.com)

Subject: Meeting Follow Up; Fuel Leak Case No. RO0000151 and GeoTracker Global ID T0600100196,
City Blue Print, 1700 Jefferson St., Oakland, CA 94612

Dear Messrs. Westbrook and Grimes:

Thank you for attending a meeting, held March 15, 2018, with respect to the subject site. The meeting was requested by the Alameda County Department of Environmental Health (ACDEH) staff to identify a Path to Closure for the site that includes remediation, the identification of data gaps to allow potential remedial options to be evaluated, and the input and evaluation of technical comments from multiple technical teams representing onsite and offsite property owners prior to work product finalization. During the meeting action items, and an associated timeline, were identified. These include the following:

- **May 4 – 11, 2018** - Submittal of Draft Figures and Tables for Feasibility Study / Corrective Action Plan (FS/CAP) to all Stakeholders.
- **May 18, 2018** – Meeting; 1:00 – 3:00 P.M.
- **June 15, 2018** – Submittal of Modified Draft Figures and Tables Incorporating Meeting and 3rd Party Technical Comments.
- **June 25, 2018** – Meeting 1:00 – 3:00 P.M.
- **August 27, 2018** – Submittal of 3rd Party Reviewed Draft FS/CAP, with Remedial Design Investigation Work Plan for Data Gaps, Inclusive of Pilot Test and Lateral Delineation Data Gaps, as Attachment, as needed.
- **September 10, – October 10, 2018** – Public Comment Period; 30 days
- **September – October** – Implementation of Pilot Test(s) / Work Plan
- **December 14, 2018** – Submittal of 3rd Party Reviewed Corrective Action Implementation Plan (CAIP); Implementation and Design details.
- **January – February 2019** – CAIP Approval and Implementation

Additionally, based on the discussion in the meeting ACDEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

1. **Semi-Annual Groundwater Monitoring** – As discussed in the meeting, and except for new wells that have not been monitored and sampled for one full hydrologic cycle, ACDEH confirms that the site is otherwise to be monitored and sampled on a semi-annual monitoring and sampling interval. Using worst-case groundwater concentrations, it appears that the months of April and October of a year will provide a representative worst-case groundwater concentration snapshot at the site. Because the months of historic monitoring and sampling has been sufficient irregular, further analysis may indicate

slightly different months. To minimize reporting, ACDEH requests that groundwater analytical data generated at the recently installed wells that are on a quarterly groundwater monitoring and sampling interval be reported in the semi-annual reports.

2. **Interface Probe Use** – ACDEH has not found notes that an Interface Probe has been used during groundwater sampling events beneath the site, including in the *4th Quarter 2017 – Ground Water Monitoring Report*, prepared and submitted on your behalf by Applied Water Resources Corporation (AWR), and dated January 12, 2018. Its use was referenced in the *Comprehensive Summary of Site Conditions*, dated November 30, 2017; however, its use was not been documented on associated field data sheets. ACDEH requests that an Interface Probe be used, and its use documented, in field data sheets during future events until otherwise eliminated from the field equipment schedule.
3. **Chlorinated Volatile Organic Compound Analysis** – As discussed in the meeting, unless historic groundwater data can be located, ACDEH requests the analysis of groundwater for Chlorinated Volatile Organic Compounds (VOCs) from site wells for a minimum of one event. Based on the schedule itemized above, it is appropriate to evaluate historic data prior to immediately proceeding.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

Please note that ACDEH has updated Attachment 1 with regard to report submittals. For final documents, ACDEH is now requiring a Submittal Acknowledgement Statement, replacing the Perjury Statement, as a cover letter 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/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website.

Please make this change to your submittals to ACDEH.

TECHNICAL REPORT REQUEST

Please submit the following technical reports and deliverables to the State Water Board's Geotracker website and notify your case worker by electronic mail (mark.detterman@acgov.org), in accordance with the following specified file naming convention and schedule, as provided below, and in the Responsible Party(ies) Legal Requirements/Obligations which is included as Attachment 1:

- **June 29, 2018** – Second Quarter 2018 Groundwater Monitoring Report
(File to be named RO151_GWM_R_yyyy-mm-dd)
- **August 27, 2018** –Draft FS/CAP (3rd Party Reviewed)
(File to be named RO151_FS_CAP_R_yyyy-mm-dd)
- **December 14, 2018** – Corrective Action Implementation Plan (CAIP; 3rd Party Reviewed)
(File to be named RO151_CAIP_R_yyyy-mm-dd)
- **December 21, 2018** – Third Quarter 2018 Groundwater Monitoring Report (with VOC Analysis?)
(File to be named RO151_GWM_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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 567-6876 or send me an electronic mail message at mark.determan@acgov.org.

Sincerely,



Mark E. Determan, P.G., C.E.G.
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations & ACDEH Electronic Report Upload (ftp) Instructions

cc: Steven Michelson, Applied Water Resources Corporation, 2363 Mariner Square Drive, Suite 245, Alameda, CA 94501; (Sent via electronic mail to: smichelson@awrcorp.net)

Yola Bayram, Applied Water Resources Corporation, 2363 Mariner Square Drive, Suite 245, Alameda, CA 94501; (Sent via electronic mail to: ybayram@awrcorp.net)

Steve Goldberg, Downey, Brand, 621 Capitol Mall, 18th Floor, Sacramento, CA 95814; (Sent via electronic mail to: sgoldberg@downeybrand.com)

Lance Lo, Jefferson Court Commercial Ventures, LLC, 1728 Ocean Avenue #128, San Francisco, CA 94112; (Sent via electronic mail to: lltgc@aol.com)

Cote and Cookie Reese, 1701 San Pablo Avenue, Oakland, CA 94612; (Sent via electronic mail to: citydentaloffice@aol.com)

Andy Lojo, Terraphase Engineering, Inc, 1404 Franklin Street, Suite 600, Oakland, CA 94612; (Sent via electronic mail to: andrew.lojo@terrphase.com)

Chris Jones, Terraphase Engineering, Inc, 1404 Franklin Street, Suite 600, Oakland, CA 94612; (Sent via electronic mail to: chris.jones@terrphase.com)

Jeffrey S. Lawson, Silicon Valley Law Group, One North Market Street, Suite 200, San Jose, CA 95113; (Sent via electronic mail to: jsl@svlg.com)

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

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

Mark Determan, ACDEH; (Sent via electronic mail to: mark.determan@acgov.org)

Electronic File; GeoTracker

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: 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/)

- 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	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	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	✓	✓	✓	✓	✓

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

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