

Nowell, Keith, Env. Health

From: mehrdad.dokhanchy@comcast.net
Sent: Monday, September 21, 2015 10:13 AM
To: Nowell, Keith, Env. Health
Cc: Roe, Dilan, Env. Health; Hemmat, Ed; Tim Cook
Subject: Re: Fuel leak case RO0000182 and GeoTracker Global ID T06019784055, Robinson Property / Mohawk Oil Co, 5630 San Pablo Avenue, Oakland

Good Morning Keith,

Thank you for providing the list of information and documents that should be gathered.

Our Consultant's contact information is as follow:

Tim Cook. President

Cook Environmental Services, Inc.

General Engineering Contractor A, HAZ # 921387

1485 Treat Boulevard , Walnut Creek CA 94597

Telephone: 925 478 8394

I spoke to Tim about our meeting and submitting the water testing result he is working on. We expect Tim to submit the result and his report including recommendation on how to proceed this week.

We will start working the rest of items..

Best,

Mehrdad

From: "Keith Nowell, Env. Health" <Keith.Nowell@acgov.org>
To: "Mehrdad Dokhanchy (mehrdad.dokhanchy@comcast.net)" <mehrdad.dokhanchy@comcast.net>
Cc: "Dilan Roe, Env. Health" <Dilan.Roe@acgov.org>
Sent: Thursday, September 17, 2015 1:10:52 PM
Subject: Fuel leak case RO0000182 and GeoTracker Global ID T06019784055, Robinson Property / Mohawk Oil Co, 5630 San Pablo Avenue, Oakland

Dear Mr. Dokhanchy,

Thank you for meeting with Alameda County Environmental Health (ACEH) September 16, 2015 regarding the subject fuel leak case. It was a pleasure meeting with you, and ACEH looks forward to working with you and your consultants to move the case towards closure.

Thank you for providing a copy of the document entitled *Second Quarter 2012 Groundwater Monitoring and Sampling* (GWMR), dated July 16, 2012 and prepared by Enviro Soil Tech Consultants for the subject site. As discussed in the meeting, the report will need to be uploaded to the ACEH ftp website with an accompanying perjury statement, and submitted to the State Water Resource Control Board's (SWRCB) GeoTracker website. Additionally, GeoTracker submittals should include a stand-alone figure, such as Figure 2 in the GWMR (as a GEO_MAP), the depth to water data (as a GEO_WELL file), and the laboratory analysis report (as a EDF). A discussion of the requirements of a perjury statement and GeoTracker submittals is provided below. Instructions for uploading files to the ACEH ftp website are provided as an attachment.

Additionally, ACEH received the development plans prepared for the subject site and requested at our meeting. The plans, requested as a submittal and discussed below, were provided to ACEH as email attachments during the preparation of this letter. Thank you for your prompt response.

The following items were discussed and presented as action items:

1. **Current Groundwater Monitoring Report** – ACEH was made aware that a groundwater monitoring and sampling event is currently in progress. As no reports have been submitted to ACEH since the adoption of the SWRCB Low Threat Underground Storage Tank Case Closure Policy (LTCP), which became effective on August 17, 2012, ACEH requests the groundwater monitoring report include an evaluation of the case against the LTCP. The evaluation should evaluate the site against the general and media specific criteria on the LTCP. Based on the LTCP evaluation findings, please include recommendations for closure or for a data gap investigation identifying the specific criteria to be addressed and outlining steps to meet the criteria.

Please submit the report by the date specified below. Upon review ACEH will schedule a meeting with you and your consultant to discuss the path to closure.

2. **Electronic Submittal of Information** - Please upload any and all documents pertaining to investigation and remedial activities, including all Phase I and Phase II Environmental Site Assessments, and tank removal reports, for your site to the ACEH ftp and the SWRCB GeoTracker websites. GeoTracker requires electronic submittal of information (ESI). Hence, please upload the laboratory analysis report(s) in electronic deliverable format (EDF), reports (GEO_REPORTs) and figures (GEO_MAPs) to GeoTracker. Additionally, groundwater monitoring reports are required to submit depth to water data in a GEO_WELL file.

Please upload existing (and all future submittals) to GeoTracker and ACEH's ftp websites by the date specified below. Electronic reporting is described on the attachments. Additional information regarding the SWRCB's GeoTracker website may be obtained online at:

http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/

and at

http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml.

Additional information and/or clarification may be obtained by contacting the GeoTracker Help Desk at geotracker@waterboards.ca.gov or (866) 480-1028.

ACEH is aware of two Phase I Environmental Site Assessments, one dated June, 2000 prepared by AEI Consultants and one prepared by International Geologic in June, 2003, that have not been submitted to ACEH. The GWMR discussed above has not been submitted to either ACEH or GeoTracker. Additionally, the GEO_XY data file for the well survey has not been submitted to GeoTracker. At the meeting, information was provided indicating that underground storage tanks removed in October, 2000. Please upload a copy of the tank removal report if one is present in your files. ACEH will endeavor to locate tank removal documentation in the Certified Unified Program Agency (CUPA) files.

Please provide ACEH with a list of uploaded documents by the date specified below. The document listing may be provided via email to my attention.

3. **Perjury Statement** – All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." 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.

A copy of a previous perjury statement for your site is included as an attachment.

4. **Development Plans** – Development plans have previously been prepared for the site and submitted to the City of Oakland for review. Please provide a copy of the plans for ACEH review and comment. The plans may be sent to our office and are not required to be submitted electronically.

Though discussed in the meeting but not identified as an action item, please send your new consultants contact information so the consultant can be included as a cc in future communications. Please provide the contact information via email by the date specified below.

Technical Report Request

Please upload technical reports to the ACEH ftp site (Attention: Keith Nowell), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **September 25, 2015** – Consultant Contact Information (provided via email - Attn.: Keith Nowell)
- **October 1, 2015** – Electronic Submittal of Information (ESI)
- **October 1, 2015** – List of ESI documents uploaded (provided via email - Attn.: Keith Nowell)
- **October 1, 2015** – Development Plans to ACEH (Attn.: Keith Nowell)
- **November 16, 2015** – Groundwater Monitoring Report and LTCP Evaluation - (file to be named: RO0000182_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.

Thank you for your cooperation. ACEH 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.

Respectfully,
Keith Nowell

Keith Nowell PG, CHG
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda , CA 94502-6540
phone: 510 / 567 - 6764
fax: 510 / 337 - 9335
email: keith.nowell@acgov.org

PDF copies of case files can be reviewed/downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>

Attachment 1 – Responsible Party (ies) Legal Requirements/Obligations and Electronic Report Upload (ftp) Instructions

Attachment 2 – Sample Perjury Statement