

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

COLLEEN CHAWLA, Agency Director



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

June 25, 2018

3000 Broadway SPC LLC
c/o Lowe Enterprises Real Estate Group
Attn. Alan Chamorro
595 Market St., Suite 2550
San Francisco, CA 94105
(Sent via email to: achamorro@loweenterprises.com)

Burrows Company
c/o Bruce and Barton Burrows
286 Glorietta Blvd.
Orinda, CA 94563

Robert and Ruth Burrows Trust
219 Ramona Ave.
Piedmont, CA 94611

Bruce Burrows & Barton & Patricia Burrows et al.
286 Glorietta Blvd.
Orinda, CA 94563

Subject: Request for Technical Report
Leaking Underground Storage Tank (LUST) Cleanup Site Case No. RO0000247
GeoTracker Global ID T0600102220
Robert & Ruth Burrows Trust
260 30th Street, Oakland, CA

Dear Responsible Party(ies):

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file associated with the above referenced property (the "Site") and evaluated the associated LUST Case (the Case) in accordance with the State Water Resources Control Board's (State Water Board's) Low Threat Underground Storage Tank Case Closure Policy (LTCP). ACDEH understands that the Site has been acquired by 3000 Broadway SPE LLC and is currently being redeveloped in concurrence with adjacent parcels under the oversight of ACDEH's Site Cleanup Program (SCP) case number RO0003236. Elements of this redevelopment include construction dewatering and implementation of corrective actions at the Site overseen under the associated SCP case. The corrective actions include excavation of sub-grade soils and installation of a vapor intrusion mitigation system.

The purpose of this letter is to document that ACDEH has changed the status of LUST Cleanup Site Case number RO0000247 from "Open – Site Assessment" to "Open – Inactive". Following completion of SCP regulated corrective actions and redevelopment activities (i.e. construction dewatering) the LUST case will be reactivated and an LTCP closure evaluation will be conducted. Please note that the Site is still required to meet all criteria for closure under the LTCP. If the Site does not meet LTCP closure criteria when the LUST case is reactivated, ACDEH will issue a request for technical reports to address any remaining impediments to closure under the LTCP.

At this time, ACDEH has evaluated the Site against LTCP closure criteria based on the case file for the LUST case and the SCP case. ACDEH has determined that the Case does not meet the LTCP closure criteria indicated in Table 1 below:

Table 1 – Unsatisfied LTCP Closure Criteria

General Criteria		Media Specific Criteria
<input type="checkbox"/> a. Public Water	<input checked="" type="checkbox"/> e. CSM	<input checked="" type="checkbox"/> 1. Groundwater
<input type="checkbox"/> b. Petroleum Only	<input checked="" type="checkbox"/> f. Secondary Source	<input checked="" type="checkbox"/> 2. Petroleum Vapor Intrusion to Indoor Air
<input type="checkbox"/> c. Release Stopped	<input type="checkbox"/> g. MTBE	<input type="checkbox"/> 3. Direct Contact and Outdoor Air Exposure
<input type="checkbox"/> d. Free Product	<input type="checkbox"/> h. Nuisance	

An LTCP criteria evaluation checklist is provided in **Attachment A**. Specific details pertaining to ACDEHs evaluation of the LTCP closure criteria indicated above that are not met at this time are provided in **Section I** of this letter. An evaluation of the case’s GeoTracker compliance is included in **Section II**. Deliverables and technical reports requested to address unsatisfied LTCP closure criteria or other impediments to regulatory case closure are summarized in **Section III**.

I. UNSATISFIED LTCP CLOSURE CRITERIA EVALUATION

The following unsatisfied LTCP closure criteria were identified during ACDEH’s review of the case file. Excerpts from the LTCP are included in *grey italics*.

General Criteria

e. A conceptual site model (CSM) that assesses the nature, extent, and mobility of the release has been developed

“The CSM establishes the source and attributes of the unauthorized release, describes all affected media (including soil, groundwater, and soil vapor as appropriate), describes local geology, hydrogeology and other physical site characteristics that affect contaminant environmental transport and fate, and identifies all confirmed and potential contaminant receptors (including water supply wells, surface water bodies, structures and their inhabitants). ...All relevant site characteristics identified by the CSM shall be assessed and supported by data so that the nature, extent and mobility of the release have been established to determine conformance with applicable criteria in this policy.”

ACDEH’s review of the case files indicates that data gaps relative to the completeness of the CSM are present with respect to the evaluation of Media Specific Criteria for Groundwater and Petroleum Vapor Intrusion to Indoor Air which are discussed in **Section I.1** and **Section I.2** respectively.

f. Secondary source has been removed to the extent practicable

“ Unless site attributes prevent secondary source removal... petroleum-release sites are required to undergo secondary source removal to the extent practicable... ‘To the extent practicable’ means implementing a cost-effective corrective action which removes or destroys-in-place the most readily recoverable fractions of source-area mass... Following removal or destruction of the secondary source, additional removal or active remedial actions shall not be required by regulatory agencies unless (1) necessary to abate a demonstrated threat to human health or (2) the groundwater plume does not meet the definition of low threat as described in this policy.”

The site is currently undergoing redevelopment which includes the excavation of surface and shallow soils. Following completion of these excavation and grading activities, this criteria must be re-evaluated.

Media Specific Criteria

1. Groundwater

“If groundwater with a designated beneficial use is affected by an unauthorized release, to satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites listed [in the policy and

summarized in *Error! Reference source not found.* below]. A plume that is “stable or decreasing” is a contaminant mass that has expanded to its maximum extent: the distance from the release where attenuation exceeds migration.

...Sites with soil that does not contain sufficient mobile constituents...to cause groundwater to exceed the groundwater criteria in this policy shall be considered low-threat sites for the groundwater medium.”

ACDEH’s review of the Case file for the Site and the associated SCP case have identified petroleum hydrocarbons in groundwater at boring locations B1, B4, and B-11, all of which are located in the immediate vicinity of the unauthorized release associated with the Case. These three sample locations represent the south and southwestern most extents of available groundwater data. No constituents were reported as present within groundwater samples collected from these sample locations above LTCP closure criteria or water quality objectives, however, insufficient evidence has been reported at this time to determine if the reported concentrations increase or decrease to the south. Furthermore, implementation of construction dewatering activities and excavation activities at the as part of redevelopment activities will intrinsically alter the geology and hydrogeology in the vicinity of the unauthorized release. As such, plume stability and extents will need to be re-evaluated upon completion of redevelopment activities.

2. Vapor Intrusion to Indoor Air

“Petroleum releases shall satisfy the media-specific criteria for petroleum vapor intrusion to indoor air and be considered low-threat for vapor-intrusion-to-indoor-air pathway if:

- a. Site-specific conditions at the release site satisfy all of the characteristics and criteria of scenarios 1 through 3 as applicable, or all the characteristics and criteria of scenario 4 as applicable [These scenarios are summarized in Table 2 below]; or
- b. A site-specific risk assessment for vapor intrusion pathway is conducted and demonstrates that human health is protected to the satisfaction of the regulatory agency; or
- c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, the regulatory agency determines that petroleum vapors migrating from soil or groundwater will have no significant risk of adversely affecting human health.

...satisfaction of the media-specific criteria for petroleum vapor intrusion to indoor air is not required at active commercial petroleum fueling facilities, except in cases where release characteristics can be reasonably believed to pose an unacceptable health risk.”

As discussed in Section I.1, the extents and stability of the Groundwater Plume will need to be re-evaluated upon completion of redevelopment activities. Until these properties have been re-evaluated, a determination of if the Site meets any of the criteria for the LTCP Exposure Scenarios for petroleum vapor intrusion which are summarized in Table 3 below cannot be made. Based on ACDEH’s review of the case file, historic depth to groundwater in the vicinity of the Site ranges from 7.6 to 14.3 feet below ground surface. The maximum reported benzene concentration in groundwater is 0.65 micrograms of analyte per liter of sample ($\mu\text{g/L}$). Soil analytical data to determine the total petroleum hydrocarbon (TPH) concentrations in soil at the Site is limited and will need to be re-evaluated once excavation and grading activities associated with the redevelopment of the Site are complete. ACDEH notes that as part of redevelopment, installation of engineering controls to mitigate vapor intrusion risks at the Site are being implemented which may qualify the case for closure under Vapor Intrusion to Indoor Air Scenario C. ACDEH also notes that the engineering controls being implemented at the Site do not address potential vapor intrusion risks to off-site receptors and that vapor intrusion risk to off-site receptors will need to be evaluated once redevelopment activities are complete.

Table 2 - Petroleum Vapor Intrusion to Indoor Air Exposure Scenario Characteristics and Criteria

	Exposure Scenario									
	1	2	3			4				
			a	b	c	a	b	c	d	
Bounds of BAZ	BoF to LNAPL in GW	BoF to LNAPL in Soil	BoF to Max GW			-	BoF to 5' below BoF	GS to 5' below GS		
Minimum BAZ Length	30'	30'	5'	10'	5'	-	5'			
TPH in BAZ Threshold (mg/kg)	<100	<100	<100			-	<100			
Benzene in GW Threshold (µg/L)	-	-	<100	≥100 and <1,000	<1,000	-	-			
Soil Gas Sample Depth	-	-	-			5' below BoF	5' below GS	5' below BoF	5' below GS	
Oxygen in BAZ	-	-	Unk or <4%	Unk or <4%	≥4%	-	≥4%			
Benzene in soil gas of BAZ	RES	COM	-			<85	<280	<85,000		
Ethylbenzene in soil gas of BAZ	RES	COM	-			<1,100	<3,600	<1,100,000		
Napthalene in soil gas of BAZ	RES	COM	-			<93	<310	<93,000		
								<310,000		

"-": Criteria not applicable to exposure scenario; "BAZ": Bioattenuation Zone; "BoF": Base of Foundation; "LNAPL": unweathered light non-aqueous phase liquid; "Max GW": maximum recorded historic groundwater elevation; "' ": feet; "GS": existing ground surface; "TPH": sum of gasoline range and diesel range total petroleum hydrocarbons; "mg/kg": miligrams of analyze per kilograms of sample; "µg/L": micrograms of analyte per liter of sample; "Unk": Unknown; "RES": residential; "COM": commercial;

II. GEOTRACKER COMPLIANCE

ACDEH's review of the case file included a GeoTracker compliance audit. GeoTracker reporting requirements are described in Section 3893 of the California Code of Regulations. Non-compliant GeoTracker requirements identified as part of ACDEH's compliance audit are identified in the table below.

Table 3 – Non-compliant GeoTracker Requirements	
<input checked="" type="checkbox"/> Latitude and longitude of wells (GEO_XY)	<input checked="" type="checkbox"/> Depth and length of screened interval of wells (Field Point ID)
<input checked="" type="checkbox"/> Surveyed elevation of wells (GEO_Z)	<input checked="" type="checkbox"/> Boring log (GEO_BORE)
<input checked="" type="checkbox"/> Elevation of groundwater in wells (GEO_WELL)	<input checked="" type="checkbox"/> Technical report (GEO_REPORT)
<input checked="" type="checkbox"/> Site map(s) depicting location of <u>all</u> sampling points (GEO_MAP)	

All soil borings or monitoring wells associated with the Site must have applicable geotracker compliance data uploaded. ACDEH acknowledges that many of these field points are uploaded under the SCP case for the Site, however, GEO_XY, GEO_Z, GEO_WELL, Field Point ID's, GEO_BORE, and GEO_REPORTS (including laboratory electronic data files [EDF] and technical reports) which will be used to support closure of the Case under the LTCP

must also be uploaded into the Case file. ACDEH also identified that EFDs were missing from both the LUST and SCP case for analytical from borings B-5 through B-16, B-1 through B-4 from the 3020 Broadway property, and B-37 through B-45.

III. DELIVERABLE AND TECHNICAL REPORT REQUEST(S)

Please submit the following technical reports and deliverables to ACDEH (Attention: Jonathan Sanders) in accordance with the compliance dates provided below and the *Responsible Party(ies) Legal Requirements/Obligations* and the *File Names for Electronic Reports* which are included as **Attachment B** and **Attachment C** respectively. These technical reports are being requested pursuant to Section 25296.10 of the California Health and Safety Code and Article 11, Chapter 16, Division 3 of Title 23 of the California Code of Regulations. Failure to comply with the deliverable and technical report request compliance dates listed below could result in enforcement action(s) as described in **Attachment B**.

1. Updated Site Conceptual Model and Request for Closure OR Work Plan Compliance Date: September 16, 2019

Please prepare a Request for Closure document or a Data Gap Evaluation Work Plan supported by an updated CSM. The compliance date for this deliverable is 60 days after completion of earthwork activities based on the *Preliminary Construction Schedule* for the 3000 Broadway redevelopment dated April 20, 2018. ACDEH understands that construction schedules are subject to change and is willing to adjust the compliance date accordingly upon receipt of a written request with justification for the change in compliance date.

A Request for Closure or a Work Plan must be supported by an updated CSM reflecting current site conditions. ACDEH recommends that the CSM be prepared using ACDEH's tabular format. A template for the preparation of a CSM following this tabular format is available on request. For the Request for Closure, an evaluation must be included that identifies and supports the specific criteria that the Site meets for closure under the LTCP. If the Site does not qualify for closure under the LTCP, a Subsurface Investigation Work Plan must be prepared in general accordance with the State Water Boards *Leaking Underground Fuel Tank Guidance Manual* (the LUFT Manual) and must contain the following elements:

- a. A description of the Scope of Work (SOW) with technical justification for monitoring well and/or sample location selection that is supported by the CSM to address data gaps identified in the CSM as impediments to closure under the LTCP. If a dynamic work plan is used, decision criteria should be identified and described;
- b. A sampling and analysis plan, including identification of DQOs, analytical methods, sampling methods, sampling intervals and criteria, and quality control and quality assurance measures; Sampling methods must reference an Standard Operating Procedure which must be included as an appendix; and
- c. A description of reporting requirements.

2. GeoTracker Compliance Uploads Compliance Date: September 16, 2019

Please address the GeoTracker compliance issues identified in **Section II** by the compliance date listed above.

IV. CLOSING

ACDEH looks forward to continuing to work with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please contact the primary caseworker, Jonathan Sanders who can be reached by phone at (510)567-6791 or by email at jonathan.sanders@acgov.org.

Sincerely,



Dilan Roe, P.E. C73703
Chief
Land & Water Division



Jonathan Sanders
Senior Hazardous Materials Specialist
Local Oversight and Site Cleanup Program

ENCLOSURES:

- Attachment A LTCP Closure Criteria Evaluation Checklist
- Attachment B Responsible Party(ies) Legal Requirements / Obligations
- Attachment C File Names for Electronic Reports

DISTRIBUTION LIST:

Electronic File, GeoTracker

Dilan Roe, ACDEH, Chief Land, Water Division (Sent via E-mail to: dilan.roe@acgov.org)

Jonathan Sanders, ACDEH, Senior Hazardous Materials Specialist (Sent via E-mail to: jonathan.sanders@acgov.org)

Joshua Graber, Langan, Assocaite (sent via E-mail to: jgraber@langan.com)

ATTACHMENT A

LTCP Closure Criteria Evaluation Checklist

ROBERT & RUTH BURROWS TRUST (T0600102220) - [MAP THIS SITE](#)

PUI

260 30TH ST.
OAKLAND , CA 94611
ALAMEDA COUNTY
LUST CLEANUP SITE ([INFO](#))
STATUS: OPEN - SITE ASSESSMENT

CLEANUP OVERSIGHT AGENCIES

ALAMEDA COUNTY LOP ([LEAD](#)) - CASE #: R0000247 - [JONATHAN E. SANDERS](#)
SAN FRANCISCO BAY RWQCB (REGION 2) - CASE #: 01-2411 - [Regional Water Board](#)

- [Activities Report](#)
- [Documents / Data](#)
- [Environmental Conditions](#)
- [Admin](#)
- [Funding](#)
- [Case Reviews](#)

THERE ARE 1 OTHER CASES ASSOCIATED WITH THIS CASE - [SHOW](#)

THIS PROJECT WAS LAST MODIFIED BY [JONATHAN E. SANDERS](#) ON 6/25/2018 10:50:14 AM - [HISTORY](#)

CLOSURE POLICY

THIS VERSION IS FINAL AS OF 6/25/2018

CHECKLIST INITIATED ON 7/31/2013

[CLOSURE POLICY HI](#)

General Criteria - *The site satisfies the policy general criteria - [CLEAR SECTION ANSWERS](#)* **NO**

- a. Is the unauthorized release located within the service area of a public water system?

Name of Water System :

EBMUD

 YES
- b. The unauthorized release consists only of petroleum ([info](#)). YES
- c. The unauthorized ("primary") release from the UST system has been stopped. YES
- d. Free product has been removed to the maximum extent practicable ([info](#)). FP Not Encountered YES
- e. A conceptual site model that assesses the nature, extent, and mobility of the release has been developed ([info](#)).

Description (Check all that Apply):

 - GW Not Evaluated
 - Groundwater Assessment Incomplete - Areal Extent of Contamination Not Defined
 - Groundwater Assessment Incomplete - Depth of Contamination Not Defined
 - Hydrogeology Not Adequately Defined
 - Potential Receptors Not Identified
 - Soil Assessment Incomplete - Areal Extent Not Defined
 - Soil Assessment Incomplete - Depth Unknown
 - Soil Vapor Not Evaluated
 - Other -

Groundwater and soil criteria need to be re-evaluated upon completion of redevelopment activities associated with Site Cleanup Program case R00003236 (specifically implementation of corrective actions and construction dewatering).

 YES
- f. Secondary source has been removed to the extent practicable ([info](#)).

Impediment to Removing Secondary Source (Check all that Apply):

 - Remediation Has Not Been Attempted
 - Remediation Was Designed Incorrectly
 - Remediation Was Shut Off Prematurely
 - Poor Remediation O&M
 - Other -

Corrective actions are currently being overseen by ACDEH under a separate Site Cleanup Program (SCP) case (R00003236). The need for further remediation will be evaluated upon completion of the SCP case.

 YES
- g. Soil or groundwater has been tested for MTBE and results reported in accordance with Health and Safety Code Section 25296.15. Not Required YES
- h. Does a nuisance exist, as defined by [Water Code section 13050](#). YES

1. Media-Specific Criteria: Groundwater - *The contaminant plume that exceeds water quality objectives is stable or decreasing in areal extent, and meets all of the additional characteristics of one of the five classes of sites listed below. - [CLEAR SECTION ANSWERS](#)*

EXEMPTION - Soil Only Case (Release has not Affected Groundwater - [Info](#)) YES

Does the site meet any of the Groundwater specific criteria scenarios? YES

ADDITIONAL QUESTIONS - Please indicate only those conditions that do not meet the policy criteria:

- Plume Length (That Exceeds Water Quality Objectives) :**
 - ≥ 100 Feet and < 250 Feet
 - ≥ 250 Feet and < 1,000 Feet
 - ≥ 1,000 Feet
 - Unknown
- Plume is Stable or Decreasing in AREAL Extent :**
 - No
 - Unknown
- Free Product in Groundwater :**
 - Yes
 - No
 - Unknown
- Free Product Has Been Removed to the Maximum Extent Practicable :**
 - No
 - Unknown
- For sites with free product, the Plume Has Been Stable or Decreasing for 5-Years (info) :**
 - No
 - Unknown
- For sites with free product, owner Willing to Accept a Land Use Restriction (if required) :**
 - No
 - Unknown
- Free Product Extends Offsite :**
 - Yes
 - Unknown
- Benzene Concentration :**
 - ≥ 1,000 µg/l and < 3,000 µg/l
 - ≥ 3,000 µg/l
 - Unknown
- MTBE Concentration :**
 - ≥ 1,000 µg/l
 - Unknown
- Nearest Supply Well (From Plume Boundary) :**

≤ 250 Feet > 250 Feet and ≤ 1,000 Feet Unknown

Nearest Surface Water Body (From Plume Boundary) :

≤ 250 Feet > 250 Feet and ≤ 1,000 Feet Unknown

2. Media Specific Criteria: Petroleum Vapor Intrusion to Indoor Air - *The site is considered low-threat for the vapor-intrusion-to-air pathway if site-specific conditions satisfy items 2a, 2b, or 2c - [CLEAR SECTION ANSWERS](#)*

EXEMPTION - Active Commercial Petroleum Fueling Facility

YES

Does the site meet any of the Petroleum Vapor Intrusion to Indoor Air specific criteria scenarios?

YES

ADDITIONAL QUESTIONS - Please indicate only those conditions that do not meet the policy criteria:

Soil Gas Samples :

No Soil Gas Samples Taken Incorrectly

Exposure Type :

Residential Commercial

Free Product :

In Groundwater In Soil Unknown

TPH in the Bioattenuation Zone :

≥ 100 mg/kg Unknown Soil samples not taken at two depths within 5 ft. zone (only for Scenario 4 with BioZone)

Bioattenuation Zone Thickness :

< 5 Feet (No BioZone) ≥ 5 Feet and < 10 Feet ≥ 10 Feet and < 30 Feet ≥ 30 Feet 30ft BioZone Compromised TPH > 100mg/kg Unknown

O2 Data in Bioattenuation Zone :

No O₂ Data O₂ < 4% O₂ ≥ 4%

Benzene in Groundwater :

≥ 100 µg/l and < 1,000 µg/l ≥ 1,000 µg/l Unknown

Soil Gas Benzene :

≥ 85 µg/m³ and < 280 µg/m³ ≥ 280 µg/m³ and < 85,000 µg/m³ ≥ 85,000 µg/m³ and < 280,000 µg/m³ ≥ 280,000 µg/m³ Unknown

Soil Gas EthylBenzene :

≥ 1,100 µg/m³ and < 3,600 µg/m³ ≥ 3,600 µg/m³ and < 1,100,000 µg/m³ ≥ 1,100,000 µg/m³ and < 3,600,000 µg/m³ ≥ 3,600,000 µg/m³ Unknown

Soil Gas Naphthalene :

≥ 93 µg/m³ and < 310 µg/m³ ≥ 310 µg/m³ and < 93,000 µg/m³ ≥ 93,000 µg/m³ and < 310,000 µg/m³ ≥ 310,000 µg/m³ Unknown

3. Media Specific Criteria: Direct Contact and Outdoor Air Exposure - *The site is considered low-threat for direct contact and outdoor air exposure if it meets 1, 2, or 3 below. - [CLEAR SECTION ANSWERS](#)*

EXEMPTION - The upper 10 feet of soil is free of petroleum contamination

YES

Does the site meet any of the Direct Contact and Outdoor Air Exposure criteria scenarios?

YES

3(a) - Maximum concentrations of petroleum constituents in soil are less than or equal to those listed in the following table ([LINK](#)) for the specified depth below ground surface.

YES

Additional Information

Should this case be closed in spite of NOT meeting policy criteria?

YES

Has this LTCP Checklist been updated for FY 17/18?

YES

[SPELL CHECK](#)

Save Form as Partially Completed

Save Form as Complete

ATTACHMENT B

Responsible Party(ies) Legal Requirements / Obligations

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.

ATTACHMENT C

File Names for Electronic Reports

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: April 4, 2018
	PREVIOUS REVISIONS: April 4, 2018, July 17, 2017, November 8, 2016, December 15, 2015, December 16, 2014, June 19, 2013, June 15, 2011, March 26, 2009, April 29, 2008
	ISSUE DATE: June 16, 2006
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: File Names for Electronic Reports

Format: REPORT_NAME_R_YYYY-MM-DD
Ex: SWI_R_VOL1_2006-05-25

LOP and SCP (VRAP) INCOMING REPORTS AND LETTERS	
Document Name	Abbreviation File Name= Abbreviation + Date (yyyy- mm-dd)
Abandoned Well Information/Water Supply Well Information	ABWELLINF_R
Addendum	ADEND_R (added after report name)
Additional Information Report	ADD_R
Analytical Reports (Loose data sheets not in report)	ANALYT_R
As Built Drawings (or Plans)	AS_BUILT
Case File Scanned By OFD	CASE_FILE
Cleanup and Abatement Report	CAO_R
Case Transfer Form (from CUPA)	CASE_TRNSFR_F
Conduit Study/Well Search/Sensitive Receptor/Well Survey/Preferential Pathway Study	COND_WELL_R
Corrective Action Plan (CAP)	CAP_R
Correspondence	CORRES_L
Court Injunctions	INJ_L
Development Entitlement	DEV_ENTITLE
Development Plans (Includes Plan Set, Cross-sections, and Related Drawings)	DEV_PLAN
Development Schedule (Project Schedule, Gant Chart, etc.)	DEV_SCHD
DWR Confidential Well Logs (Report containing)	report name_R_CONFIDENTIAL_YYYY-MM-DD (Ex: SWI_R_CONFIDENTIAL_YYYY-MM-DD)
DWR Well Completion Report-Confidential (Loose well logs)	DWR_WELL_CONFIDENTIAL_YYYY-MM-DD (Date of Well Log)
ESI/DAR (Environmental Site Investigation, Data Assessment Report)	ESI_R
Excavation Report	EX_R
Extension Request Letter	EXT_RQ_L

Fact Sheet	FACT_SHT
Feasibility Study	FEASSTUD_R
Groundwater Monitoring/Quarterly Summary Report	GWM_R
Financial Assurance/Letter of Credit	FNCL_ASSRNC_LOC
Interim Remedial Action Plan	IRAP_R
Interim Remediation Results (Includes Pilot Test Reports, Vapor Mitigation Reports, Soil Management Reports, Free Product Removal Reports, & Dual-Phase Extraction Reports)	IR_R
Lawsuit	LAWSUIT_R
Migration Control Report	MIG_R
Miscellaneous Report/Soil Sample	MISC_R
Miscellaneous Sample Report (analytical results)	MISC_SAMP_R
Notification Letter	NOT_L
NPDES Miscellaneous Reports	NPDES_R
Operations & Maintenance Plan	OM_P
Operations & Maintenance Report	OM_R
Pay for Performance	PFP_R
Petition	PETITION_R
Phase 1 Environmental Assessment Report	PHASE1_R
Photos	PHOTO
Preliminary Site Assessment Report/Phase 2 (historic reports only)	PSA_R
Remedial Action Plan	RAP_R
Remedial Design & Implementation Plan	RDIP_R
Remediation Progress Report	REM_R
Request for Closure	RFC(_L or _R)
Risk Assessment Report	RISK_R
Risk Based Corrective Action	RBCA_R
List of Landowners Forms	LNDOWNR_F
SB2004 Letter of Commitment	LOC_L
Site Conceptual Model/Conceptual Site Model	SCM_R
Site Health & Safety Plan	SFTY_PLAN_R
Site Management	SITE_MANAGE_R_
Acknowledgement Statement for Site Management Plan	SMP_ACK_L
Site Management Plan	SMP_R
Site Summary Report	SITE_SUM_R

Soil and Water Investigation Report (Includes soil gas/vapor reports, indoor, additional site investigation, well installation, site characterization, cross section, indoor air, additional onsite investigation, Phase II/preliminary site assessment)	SWI_R
Soil Disposal Report	SOIL_DSPL_R
Source Area Characterization	SOURCAREA_R
State Information	STATE_INFO (no date)
Status Report(monthly remediation status reports addressed to sanitary district requires no stamp/perjury letter)	STAT_R
Tank/Tank System Removal Report	TNK_R
Tentative Order Report	TENT_R
Unauthorized Release Form	URF_R
UST Sampling Report	UST_SAMP_R
USTCF 5 Year Review	USTCF_5YR
USTCF issued Public Notice	USTCF_PP_L
Well Construction Report (limited to water supply wells)	WELL_CST_R
Well Decommissioning Report/Letter (well destruction/abandonment)	WELL_DCM_R
Work Plan	WP_R