

From: Roe, Dilan, Env. Health
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Subject: RE: cases with status of Eligible For Closure (EFC)
Date: Sunday, June 22, 2014 3:25:00 PM

Hi George:

Alameda County Environmental Health (ACEH) LOP staff have reviewed the 9 Alameda LOP sites with EFC status for longer than one year. I have provide a summary of the status of each of the cases below along with questions I am hoping you can help me with:

- **Fuel Leak Case No. RO0000175**, Foothill Minimart – This site is being closed by the State. This is a 5-Year review site that the State is closing. A review of the LTCP Checklist history indicates the site was identified as EFC on 6/3/2013 by the Fund, however the Closure Order was not issued on 6/5/2014. It seems appropriate that the delay in closure should be attributed to the States delay in issuing the Closure Order and as such should be reflected in the GeoTracker reports.
- **Fuel Leak Case No. RO0000368**, Chevron #9-1839 – This site is a 5-Year Review site. The site was listed as EFC by the State when the LTCP Checklist was finalized on 4/23/2013. Based on our review of GeoTracker it does not appear that the State has issued a public notification or closure Order for this site. It seems appropriate that the delay in closure should be attributed to the States delay and as such should be reflected in the GeoTracker reports.
- **Fuel Leak Case No. RO0000288**, Oro Loma Sanitary District – This site is being closed by the State. ACEH sent a letter to the RP requesting documentation of waste disposal (the last outstanding item) – a review of GeoTracker indicates the requested report was received on 3/10/2014 – we will review the documentation for completeness this week and notify the State if it is deemed complete.
- **Fuel Leak Case No. RO0000403**, BP #11133 – This site is being closed by the State. The LTCP Checklist was finalized by the Fund on 3/7/2013. We are unable to input the dates of Public Notification in the PTCP as there is no record of the notification in GeotTracker. Additionally, although a Well Destruction Report was uploaded to Geotracker on 2/14/2014, it has been rejected by Alameda LOP due to errors in the report, lack of documentation of a permit for one of the destroyed wells, AW-9, and lack of documentation of management of investigation-derived waste . ACEH has notified the RP of the deficiencies in reporting.
- **Fuel Leak Case No. RO0000482**, Unocal #7176 – The Well Destruction Report was uploaded to GeoTracker on 5/29/2014. We are waiting for copies of Waste Manifests before finalizing closure.

- **Fuel Leak Case No. RO0000408**, Unocal #3135 – ACEH issued a Well Destruction request on 4/10/2014. A review of GeoTracker indicates the report has not been uploaded to date. We will follow up on the status of the well destructions with the RP this week.
- **Fuel Leak Case No. RO0000269**, Chevorn #9-0329 – The well destruction report for this site was due on 5/30/2014. A review of GeoTracker indicates the report has not been uploaded to date. We will follow up on the status of the well destructions with the RP this week.
- **Fuel Leak Case No. RP0000036**, Vend Mart Property, and **Fuel Leak Case No. RO0000158**, Walts Auto Tec – ACEH has been awaiting verification of well destructions since 2010 and 2009, respectively. ACEH has sent multiple Enforcement Letters requesting well destructions however the RP remains recalcitrant. Any suggestions you might have would be appreciated.

Thank-you for the report and for your assistance with the questions noted above.

Dilan Roe, P.E.

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

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

From: Lockwood, George@Waterboards [mailto:George.Lockwood@waterboards.ca.gov]

Sent: Tuesday, June 17, 2014 9:28 AM

To: Roe, Dilan, Env. Health

Cc: Arzadon, Charlow@Waterboards; Heningburg, Benjamin@Waterboards

Subject: cases with status of Eligible For Closure (EFC)

Dilan

Since the adoption of Res 12-62 and the LTCP implementation on 8/17/2012, a new status of Eligible For Closure (EFC) has been in use. State wide there are currently 1567 cases in EFC status.

It has been nearly two years since EFC has been used and State Water Board is interested in the reasons for the large number of cases in this status. Attached is a spread sheet that has **identified 9 cases** with EFC status for longer than one year **where Alameda LOP is the lead**.

Please take a few moments to review this spread sheet, and if you have any questions on how it was developed or the how the reasons for delay determination was made please contact Charlow

Arzadon at 916.341.5594 Charlow.Arzadon@waterboards.ca.gov

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