



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

November 3, 2014

Hooshang Hadjian
Dublin Auto Wash
1821 Castle Gate Road
Walnut Creek, CA 94595

Iver and Janice Hilde
c.o Lange Enterprises
6500 Dublin Blvd., Suite 201
Dublin, CA 94568

Carryl MacLeod
Chevron Environmental Management Company
6101 Bollinger Canyon Road
San Ramon, CA 94583
(Sent via E-mail to: cmacleod@chevron.com)

Subject: Conditional Work Plan Approval for Fuel Leak Case No. RO0000304 and GeoTracker Global ID T0600100355, Chevron #9-2582, 7240 Dublin Boulevard, Dublin, CA 94568

Dear Mr. Hadjian, Ms. MacLeod, and Mr. and Ms. Hilde:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above referenced site including the most recent document entitled, "*Workplan for Additional Assessment*," dated October 24, 2014 (Work Plan). The Work Plan, which was prepared by Pangea Environmental Services on behalf of Hooshang Hadjian, presents plans for soil and groundwater sampling to evaluate whether the site is eligible for closure under the State Water Resources Control Board (SWRCB) Low-Threat Closure Policy (LTCP).

The proposed scope of work is conditionally approved and may be implemented provided that the technical comments below are addressed and incorporated during the proposed site investigation activities. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please see technical comment 3 regarding potential soil vapor sampling.

TECHNICAL COMMENTS

- 1. Proposed On-site Soil Borings SB-3 and SB-4.** Two on-site soil borings (SB-3 and SB-4) are proposed to evaluate soil conditions with respect to the LTCP criteria. The locations and depth of the two proposed soil borings are acceptable. We request that soil samples be collected for laboratory analysis at a minimum of two depths within the upper five feet and a minimum of one depth between 5 and 10 feet bgs. Soil samples are to be collected for laboratory analysis from any interval where staining, odor, or elevated PID readings are observed. If no staining, odor, or elevated PID readings are observed, we request that soil samples be collected from 1.5 to 2.0 feet bgs, 3.5 to 4.0 feet bgs, and 7.5 to 8.0 feet bgs.

2. **Groundwater Sampling.** Grab groundwater sampling is proposed in three off-site borings to define the extent of groundwater contamination. The proposed boring locations are acceptable. We request the grab groundwater samples be collected from a driven Hydopunch type sampler or from a screened PVC pipe placed in the borehole. Grab groundwater samples are not to be collected from an open borehole.
3. **Soil Vapor.** The LTCP does not require soil vapor sampling at active commercial fueling facilities unless an unacceptable health risk can reasonably be expected. No unacceptable health risks are likely to exist for the current active commercial service station. Therefore, ACEH is not requesting soil vapor sampling at the site. However, the site may be closed with a land use restriction and soil vapor sampling is expected to be necessary if the site is to be redeveloped in the future for residential land use. If site redevelopment to a more conservative land use is expected in the near term, you may submit a Work Plan Addendum for soil vapor sampling to assess this future pathway. Since the soil vapor sampling is not a regulatory requirement under the current land use, the costs for soil vapor sampling are not expected to be eligible for reimbursement by the Underground Storage Tank Cleanup Fund.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Jerry Wickham), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **January 15, 2015** – Groundwater Monitoring Report – Second Half 2014
File to be named: GWM_R_YYYY-mm-dd RO304
- **March 5, 2015** – Site Assessment Report
File to be named: SWI_R_YYYY-mm-dd RO304

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.

Responsible Parties
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If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org. Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. . As your email address does not appear on the cover page of this notification ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Attachments: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Colleen Winey (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551 (*Sent via E-mail to: cwiney@zone7water.com*)

Robert Clark-Ridell, Pangea, 1710 Franklin Street, Suite 200, Oakland, CA 94612 (*Sent via E-mail to: BRiddell@pangeaenv.com*)

Jerry Wickham, ACEH (*Sent via E-mail to: jerry.wickham@acgov.org*)

GeoTracker, eFile

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

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.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) GeoTracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

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.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) 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 registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional 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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- **Signature pages and perjury statements must be included and have either original or electronic signature.**
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Submission Instructions

- 1) Obtain User Name and Password
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to deh.loptoxic@acgov.org
 - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses**, and the **Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to deh.loptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.