

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

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June 28, 2018

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

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

The Lange Trust  
c/o Lange Enterprises  
6500 Dublin Blvd., Suite 202  
Dublin CA, 94568  
(Sent via E-mail to [ellielange@aol.com](mailto:ellielange@aol.com))

**Subject: Procedural Impediments to Regulatory Case Closure  
Leaking Underground Storage Tank (LUST) Cleanup Site Case No. RO0000304  
GeoTracker Global ID T0600100355  
Chevron #9-2582  
7240 Dublin, Dublin, CA 94568**

Dear Responsible Party(ies):

I would like to take this opportunity to introduce myself as the new primary caseworker for the above referenced leaking underground storage tank (LUST) cleanup site case (the "Case"). ACDEH is currently finalizing regulatory case closure under the LTCP. The public notification process and well destruction activities are complete, however, prior to closure of the Case, the following procedural impediments must be addressed:

1. The Case is not currently in compliance with GeoTracker Electronic Submittal of Information (ESI) requirements;
2. Assembly Bill 358 requires that the owner or operator transmit additional information regarding an unauthorized release to the lead regulatory agency on a written form or using an electronic format developed by the State Water Board (the Underground Storage Tank (UST) Site – Unauthorized Release / Contamination Report). These reports have not been completed for the release identified in 1988 or the release identified in 1997; and
3. The Notice of Responsibility (NOR) is out of date and will need to be re-issued by ACDEH. As part of this process, ACDEH will require submittal of an updated Landowners Form.

An evaluation of the Case's GeoTracker compliance and associated administrative impediments are discussed in **Section I**. Deliverables to address impediments 1 and 2 are requested in **Section II**. ACDEH will be issuing an updated Notice of Responsibility to address impediment 3.

## **I. 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 1 – Non-compliant GeoTracker Requirements**

<input checked="" type="checkbox"/>	Latitude and longitude of wells (GEO_XY)	<input checked="" type="checkbox"/>	Surveyed elevation of wells (GEO_Z)
<input checked="" type="checkbox"/>	Elevation of groundwater in wells (GEO_WELL)	<input checked="" type="checkbox"/>	Boring log (GEO_BORE)
<input type="checkbox"/>	Technical report (GEO_REPORT)	<input checked="" type="checkbox"/>	Laboratory Electronic Data Files (EDF)
<input checked="" type="checkbox"/>	Depth and length of screened interval of wells (Field Point ID)	<input checked="" type="checkbox"/>	Site map(s) depicting location of <u>all</u> sampling points (GEO_MAP)

1. GEO\_XY and GEO\_Z – Survey latitude, longitude, and elevation data was identified as absent from the GeoTracker database for DPE-1 and DPE-2;
2. GEO\_WELL – Depth to groundwater data has not been uploaded for the November 2001 or May 2014 events;
3. GEO\_BORE – Boring logs are missing for B1 through B-8, MW-1, MW-2, and MW-4;
4. EDF – Laboratory EDF data is missing for SB-1A and SB-2;
5. Field Point ID – Depth to top of casing and length of screened interval data is missing for DPE-1, DPE-2 EA-1, EA-2, EA-3, and MW-3;
6. GEO\_MAP – The last updated GEO\_MAP for the Site is dated January 19, 2006 and does not include locations for all field points. Please update the GEO\_MAP to include all field points, current and historical infrastructure, current and historic locations of UST system components, streets bordering the Site, and other relevant features (i.e. San Ramon Creek, utilities, extents of historic excavations and backfill).

## II. 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 13267 of the California Water Code.

### 1. **GeoTracker Compliance** **Compliance Date: August 31, 2018**

Please address the impediments to closure associated with the GeoTracker compliance issues identified in *Section I* above.

### 2. **Unauthorized Release / Contamination Reports** **Compliance Date: August 31, 2018**

Please submit two *Underground Storage Tank (UST) Site - Unauthorized Release / Contamination Reports*: one for the release events identified in 1988 and one for the release event identified in 1997.

### 3. **Landowner Form** **Compliance Date: August 31, 2018**

Please submit an updated Landowner Form. A copy of the Landowner Form will be transmitted along with the updated NOR by ACDEH at a later date.

**III. 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](mailto:jonathan.sanders@acgov.org).

Sincerely,



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



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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](mailto:dilan.roe@acgov.org))

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

Robert Clark-Riddell, Pangea (sent via E-mail to: [briddell@pangeaenv.com](mailto:briddell@pangeaenv.com))

**ATTACHMENT A**

**LTCP Closure Criteria Evaluation Checklist**

CHEVRON #9-2582 (T0600100355) - [MAP THIS SITE](#)

PUE

7240 DUBLIN - [VIEW ALTERNATE ADDRESSES](#)  
DUBLIN, CA 94568  
ALAMEDA COUNTY  
LUST CLEANUP SITE ([INFO](#))  
STATUS: OPEN - ELIGIBLE FOR CLOSURE

**PERTINENT INFORMATION:**

CUF Claim #: 17232, 5799 CUF Priority Assigned: B, D CUF Amount Paid: [\\$1,159,319](#)

**CLEANUP OVERSIGHT AGENCIES**

ALAMEDA COUNTY LOP ([LEAD](#)) - CASE #: R00000304 - [JONATHAN E. SA](#)  
SAN FRANCISCO BAY RWQCB (REGION 2) - CASE #: NA - [Regional Water](#)

- Activities Report
- Documents / Data
- Environmental Conditions
- Admin
- Funding
- Case Reviews

THIS PROJECT WAS LAST MODIFIED BY [JONATHAN E. SANDERS](#) ON 6/28/2018 11:03:07 AM - [HISTORY](#)

**CLOSURE POLICY**

*THIS VERSION IS FINAL AS OF 6/28/2018*

CHECKLIST INITIATED ON 5/17/2013

[CLOSURE POLICY HIS](#)

**General Criteria** - *The site satisfies the policy general criteria* - [CLEAR SECTION ANSWERS](#)  YES

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

EBMUD
- YES  NO
- b. The unauthorized release consists only of petroleum ([info](#)).  YES  NO
- c. The unauthorized ("primary") release from the UST system has been stopped.  YES  NO
- d. Free product has been removed to the maximum extent practicable ([info](#)).  FP Not Encountered  YES  NO
- e. A conceptual site model that assesses the nature, extent, and mobility of the release has been developed ([info](#)).  YES  NO
- f. Secondary source has been removed to the extent practicable ([info](#)).  YES  NO
- 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  NO
- h. Does a nuisance exist, as defined by [Water Code section 13050](#).  YES  NO

**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](#)  YES

**EXEMPTION - Soil Only Case (Release has not Affected Groundwater - [Info](#))**  YES  NO

Does the site meet any of the Groundwater specific criteria scenarios?  YES  NO

1.5 - The regulatory agency determines, based on an analysis of site specific conditions, that the site under current and reasonably anticipated near-term future scenarios, the contaminant plume poses a low threat to human health and safety and to the environment and water quality objectives will be achieved within a reasonable time frame.  YES  NO

**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](#)  YES

**EXEMPTION - Active Commercial Petroleum Fueling Facility**  YES  NO

**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](#)  YES

**EXEMPTION - The upper 10 feet of soil is free of petroleum contamination**  YES  NO

Does the site meet any of the Direct Contact and Outdoor Air Exposure criteria scenarios?  YES  NO

3(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 the concentrations of petroleum constituents in soil will have no significant risk of adversely affecting human health.  YES  NO

**Additional Information**

This case should be kept OPEN in spite of meeting policy criteria.  YES  NO

Has this LTCP Checklist been updated for FY 17/18?  YES  NO

[SPELL CHECK](#)

**ATTACHMENT B**

**Responsible Party(ies) Legal Requirements / Obligations**

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> December 14, 2017
	<b>ISSUE DATE:</b> July 25, 2012
	<b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016
<b>SECTION:</b> ACDEH Procedures	<b>SUBJECT:</b> 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/](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 values<sup>1</sup> 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
<b>2016 Subsurface Investigation Report</b>	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
<b>2012 Site Assessment Work Plan</b>	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>2010 GW Investigation Report</b>	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	✓	✓	✓	✓	✓

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

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

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> April 4, 2018
	<b>PREVIOUS REVISIONS:</b>  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
	<b>ISSUE DATE:</b> June 16, 2006
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> File Names for Electronic Reports

Format: REPORT\_NAME\_R\_YYYY-MM-DD  
Ex: SWI\_R\_VOL1\_2006-05-25

<b>LOP and SCP (VRAP) INCOMING REPORTS AND LETTERS</b>	
<b>Document Name</b>	<b>Abbreviation File Name= Abbreviation + Date (yyyy- mm-dd)</b>
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