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 12, 2018

Tesoro Petroleum Companies, Inc
c/o Kyle Waldron
3450 S. 344th Way, Suite 100
Auburn WA, 98001-5931
(Sent via E-mail to kyle.a.waldron@tsocorp.com)

Moller Investment Group
c/o Chuck Miller
6951 Collins Drive, Suite E-11
Moorpark CA, 93021
(Sent via E-mail to chuck.miller@danskinvestments.com)

Valero Energy Corporation
c/o Joe Aldridge
685 W. 3rd Street
Hanford CA, 93239

Subject: **Response to Submittals and Request for Stakeholders Meeting**
Leaking Underground Storage Tank (LUST) Cleanup Site Case No. RO0000434
GeoTracker Global ID T0600101410
Beacon # 3604
1619 1st Street, Livermore, CA 94550

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's evaluation included, but was not limited to, the review of the following document(s):

1. *Downgradient Well Installation Report* dated January 19, 2018 (the "Well Installation Report") prepared by Arctos Environmental on behalf of Tesoro Environmental Resources Company (Tesoro) and submitted to ACDEH as requested in ACDEH's directive letter dated November 16, 2017.

2. *Third and Fourth Quarters 2017 Semiannual Status Report* dated January 19, 2018 (the "2017-S2 Status Report") prepared by Arctos Environmental on behalf of Tesoro and submitted to ACDEH as requested in ACDEH's directive letter dated November 16, 2017.

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	
☐	a. Public Water	☑	e. CSM	☑	1. Groundwater
☐	b. Petroleum	☐	f. Secondary Source	☐	2. Petroleum Vapor Intrusion to Indoor Air
☐	c. Release Stopped	☐	g. MTBE	☐	3. Direct Contact and Outdoor Air Exposure
☐	d. Free Product	☐	h. Nuisance		

Although the Site is does not currently meet the LTCP closure critieria, ACDEH has updated the status of the Site on the State Water Board's GeoTracker website from "Open-Remediation" to "Open-Verification Monitoring". ACDEH anticipates that following submittal of the technical reports and deliverables requested in ***Section IV*** of this directive

letter the Site will be eligible for closure. In preparation of the anticipated initiation of closure proceeding, ACDEH will be issuing update Notice of Responsibilities.

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. ACDEH's comments related to data quality are provided in ***Section II***. An evaluation of the case's GeoTracker compliance is included in ***Section III***. Deliverables and technical reports requested to address unsatisfied LTCP closure criteria, ACDEH's response to submittals, or other impediments to regulatory case closure are summarized in ***Section IV***.

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*.

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 Table 2 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 indicate that insufficient evidence has been presented to support the determination that: (1) the areal extent of the groundwater plume that exceeds water quality objectives is stable or decreasing; or (2) the Site meets the characteristics of any of the Groundwater Site Classes summarized in Table 2 below.

Table 2 - Summary of Groundwater Site Class Requirements	Groundwater Site Class				
	(1)	(2)	(3)	(4)	(5)
Plume is stable or decreasing in areal extent	Yes	Yes	Yes	Yes	Yes
Maximum allowable plume length (feet)	100	250	250	1,000	-
Free product not present [N] or removed to extent practicable[A] [R]	N	N	R	N	-
Minimum required distance to nearest existing water supply well or surface water body (feet)	250	1,000	1,000	1,000	-
Maximum allowable benzene concentration in groundwater (µg/L)	-	3,000	-	1,000	-
Maximum allowable MTBE concentration in groundwater (µg/L)	-	1,000	-	1,000	-
Potential land use restriction as a condition of closure	-	-	Yes	-	-
Regulatory determination that contaminant plume poses a low threat to human health and safety and to the environment and water quality objectives will be achieved in a reasonable timeframe	-	-	-	-	Yes

"-" = criteria not applicable to site class; "µg/L" = micrograms of analyte per liter of sample; [A] = Free product may still be present below the site where the release originated, but does not extend off-site.

ACDEH's review identified the following data gaps which must be addressed with technical justification or the presentation of additional lines of evidence in order to satisfy the Media Specific Criteria Site Class 5 for Groundwater:

(1) **Plume Stability and Areal Extent:** The evaluation of the stability of the areal extent of the groundwater plume that exceeds water quality standards is intended to be based on groundwater analytical samples that are reflective of groundwater equilibrium concentrations. As reported in the 2017-S2 Status Report, on-site oxygen injection activities were shut-down in September 2017. The monitoring well network was subsequently sampled in November of 2017 with additional samples being collected from the newly installed DW-10 and MW-13 in December of 2017. Although ACDEH concurs that the results of the 4th quarter groundwater monitoring and sampling are not indicative of rebound conditions being present, additional post remediation samples are required to evaluate if groundwater analytical data collected during the 4th quarter of 2017 are reflective of equilibrium conditions and to confirm that rebound conditions are absent.

Furthermore, the northwestern bounds of the groundwater plume that exceeds water quality objectives is defined by samples collected from MW-13 and DW-10 during December of 2017. The most recently updated CSM was provided in the Remedial Action Plan (RAP) dated December 4, 2016 and indicated that that groundwater elevation and quality fluctuates on a bi-annual basis. In order to achieve data quality objectives to satisfy the criteria for Groundwater Site Class 5, ACDEH requires additional rounds of groundwater monitoring and sampling be conducted from MW-13 and DW-10 during the first, second, and third quarters of 2018 to (1) evaluate stability of the areal extents of the groundwater plume that exceeds water quality objectives and confirm that the results of the December 2017 sampling are representative and (2) to evaluate if groundwater quality within MW-13 and DW- is affected by seasonal variations

Based on these data gaps, the stability and areal extent of the groundwater plume that exceeds groundwater quality objectives cannot be determined at this time.

(2) **Maximum Plume Length:** The maximum plume length cannot be calculated until the stability and areal extent of the groundwater plume that exceeds groundwater quality objectives is determined.

(3) **Potential Land Use Restriction:** The willingness of the property owner to accept land use restrictions has not yet been reported.

II. DATA QUALITY & DATA QUALITY OBJECTIVE EVALUATION

In addition to the LTCP criteria identified above, ACDEH has identified the following issues related to data quality and data quality objectives which must be addressed prior to regulatory case closure by ACDEH.

a. Well Development and Turbidity

The Department of Toxic Substances Control's (DTSC's) Well Design and Construction for Monitoring Groundwater at Contaminated Sites (the Well Guidance) dated June 2014 establishes a ceiling turbidity for a properly design and installed monitoring well of less than 5 Nephelometric Turbidity Units (NTUs). Field data sheets indicate that upon completion of well development activities on December 1, 2017 turbidity was approximately 10 NTU in both MW-13 and DW-10. The turbidity values recorded during development of MW-13 and DW-13 do not indicate that asymptotic turbidity had been achieved in DW-10. Asymptotic trends in turbidity within MW-13 were potentially emerging at the conclusion of development activities, however, there are only two data points to support this hypothesis. During the subsequent groundwater sampling event conducted on December 4, 2017, turbidity measurements in MW-13 ranged from >1,000 to 121 NTU and turbidity measurements in DW-10 ranged from >1,000 to 24.5 NTU. Furthermore, monitoring well data collected as part of the third and fourth quarter groundwater monitoring and sampling events indicate that turbidity levels in groundwater monitoring wells greatly exceed the

recommended turbidity levels. Neither the Well Installation Report nor the 2017-S2 Status Report include any discussion pertaining to turbidity measurements at the Site or technical justification for why the turbidity levels observed should be considered acceptable.

b. Sample Methodology

Groundwater samples collected during the third and fourth quarter groundwater monitoring and sampling event and from MW-13 and DW-10 in December 2017 were reportedly collected following a purge and bailer sampling protocol consistent with historical sampling events at the Site. This purging protocol is to extract groundwater until a minimum of 3 well volumes have been removed and water quality parameters (pH, electrical conductivity, turbidity, and temperature) have met stabilization criteria (± 10% of previous parameter).

Although this sampling methodology is consistent with historic sampling protocols employed at the Site, these sampling methods are inappropriate for the evaluation of volatile constituents and could potentially bias analytical results due to volatilization. Of particular concern, several wells were identified as having been dewatered completely as part of the purging process.

ACDEH acknowledges the benefits of consistent sampling protocols as they relate to the generation of comparable data, however, before authorizing regulatory case closure under the LTCP Media Specific Criteria for Groundwater scenario 5, ACDEH requires that groundwater samples be collected using low-flow sampling techniques appropriate for the evaluation of volatile constituents as described in the Department of Toxic Substances Control's *Representative Sampling of Groundwater for Hazardous Substances* dated July 1995 and revised June 2006 (the Groundwater Sampling Guidance) and that the effect of groundwater sampling methodology on groundwater quality be evaluated.

III. 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

☐	Latitude and longitude of wells (GEO_XY)	☐	Depth and length of screened interval of wells (Field Point ID)
☐	Surveyed elevation of wells (GEO_Z)	☒	Boring log (GEO_BORE)
☐	Elevation of groundwater in wells (GEO_WELL)	☐	Technical report (GEO_REPORT)
☒	Site map(s) depicting location of all sampling points (GEO_MAP)		

IV. 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. Semi-annual Status Report, First Semester of 2018
Compliance Date: July 31, 2018

Please submit a Semi-annual Status Report documenting the results of the first and second quarter groundwater monitoring and sampling events. During the second quarter sampling, please conduct purging and sampling following low-flow protocols outlined the Groundwater Sampling Guidance. These groundwater monitoring and sampling events should be conducted in accordance with established sampling and monitoring schedule. A subset of wells should be resampled within 24-hours of the initial sampling using the historical groundwater purging and sampling protocols. This subset must only include wells which are anticipated to have reportable concentrations of benzene and TPHg, must span a range of concentrations, and must include at least six wells with reportable concentrations.

2. Closure Evaluation Report
Compliance Date: August 13, 2018

Please submit a Closure Evaluation Report evaluating the Site's compliance with LTCP closure criteria. This report shall include, at a minimum:

a. An evaluation of LTCP closure criteria. This evaluation should conclude with either a recommendation for regulatory case closure under the LTCP or recommendations to address unmet LTCP closure criteria. This evaluation should include a statement regarding the Site owner's willingness to accept land use restrictions as a contingency of closure.

b. An evaluation of data quality objectives and data quality. This evaluation should include an evaluation of the effects of historic groundwater purging and sampling methodology and well development and soil sampling methodology on data quality and should be supported by tables of historical analytical data. Tables should include indicators for (a) Data that does not meet data quality objectives; (b) soil samples that have been excavated; and (c) If data was collected before, during , or after remedial efforts which may result in the sample not being reflective of equilibrium conditions;

c. An updated CSM that is reflective of the current understanding of site and environmental conditions and that identifies any remaining data gaps. The last updated CSM was provided in the RAP in 2016. Since that time, multiple additional lines of evidence have been collected to evaluate identified data gaps. The updated CSM must be completed in accordance with the requirements of the LTCP and the State Water Board's *Leaking Underground Fuel Tank Guidance Manual* dated September 2012 and should include the following updates at a minimum:

    i. Historical remedial efforts, including locations, estimated mass of contaminants removed or recovered, and the period of each remedial action should be summarized;

    ii. The bounds of the groundwater plume that exceeds water quality objectives and stability of these bounds should be updated based on analytical data collected from MW-13 and DW-10;

    iii. The results of the Data Gap Investigation and Plume Stability Evaluation Report dated September 29, 2017 and the data presented in the preceding stakeholders meeting on September 7, 2017; and

    iv. The results of the Monitoring Well Network Analysis dated May 8, 2017;

    ACDEH recommends preparing the CSM using ACDEH's tabular format, a template of which is available on request.

This report may combined with the ***Semi-annual Status Report, First Semester of 2018*** or submitted as a stand-alone document.

V. OUTSTANDING COMPLIANCE ISSUES

ACDEH's review of the case file has identified the following past due deliverables or technical reports or non-compliant GeoTracker requirements. Please resolve these compliance issues by the revised compliance date indicated below. Failure to resolve these compliance issues may result in enforcement actions being taken.

Title of Deliverable or Technical Report Requested	Date of Request	Original Compliance Date	Revised Compliance Date
Updated GEO_MAP from the Well Installation Report	11/16/2017	01/19/2018	07/31/2018
Updated GEO_BORE from the Will Installation Report	11/16/2017	01/19/2018	07/31/2018

VI. 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, EIT
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)

Scott Stromberg, Arctos Environmental, (sent via E-mail to: sstromberg@orionenv.com)

ATTACHMENT A

LTCP Closure Criteria Evaluation Checklist

BEACON #3604 (T0600101410) - MAP THIS SITE

PUBLIC PAGE

1619 1ST
LIVERMORE , CA 94550
ALAMEDA COUNTY
LUST CLEANUP SITE (INFO)
STATUS: OPEN - REMEDIATION

PERTINENT INFORMATION:
CUF Claim #: 7646 **CUF Priority Assigned:** D **CUF Amount Paid:** $0

CLEANUP OVERSIGHT AGENCIES
ALAMEDA COUNTY LOP *(LEAD)* - *CASE #: RO0000434* - *JONATHAN E. SANDERS*
SAN FRANCISCO BAY RWQCB (REGION 2) - *CASE #: 01-1527* - *Regional Water Board*

THIS PROJECT WAS LAST MODIFIED BY ***JONATHAN E. SANDERS*** ON 6/12/2018 11:30:39 AM - HISTORY

CLOSURE POLICY

THIS VERSION IS FINAL AS OF 6/12/2018

CHECKLIST INITIATED ON 2/26/2013

CLOSURE POLICY HISTORY

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? — (●) YES ( ) NO

Name of Water System : City of Livermore; however, groundwater in the area is used for drinking water

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 — **NO**

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

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 — **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

Should this case be closed in spite of NOT meeting policy criteria? — ( ) YES (●) NO

Has this LTCP Checklist been updated for FY 17/18? — (●) YES ( ) NO

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, Division3, 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 values[1] 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	☐	☐	☐	☐	✓
2012 Site Assessment Work Plan	2012	✓	✓			☐	☐	☐	☐	☐
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	☐	☐	☐	✓
				SB-10-6	SO	☐	☐	☐	☐	✓
				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