

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 29, 2018

Equilon Enterprises, LLC
dba Shell Oil Products US
c/o Deborah Pryor
20945 S. Wilmington Ave.
Carson, CA 90810

(Sent via E-mail to deborah.pryor@shell.com)

C and J Cox Corporation
c/o Carl Cox
4431 Stoneridge Drive
Pleasanton CA, 94588

**Subject: Case Review and Request for Stakeholders Meeting
Leaking Underground Storage Tank (LUST) Cleanup Site Case No. RO0002744
GeoTracker Global ID T0600159797
Shell #13-5244
8999 San Ramon, Dublin, CA 94568**

Dear Responsible Party(ies):

I would like to take this opportunity to introduce myself as the new primary caseworker assigned to the above referenced LUST Case (the "Case"). Alameda County Department of Environmental Health (ACDEH) has reviewed the case file associated with the above referenced property (the "Site") and evaluated 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. *Groundwater Monitoring and Status Report* dated April 27, 2018 (the "2018Q1 GWM Report") prepared by Wayne Perry, Inc. (WPI) on behalf of Equilon Enterprises LLC dba Shell Oil Products (Equilon).
2. *Consultant Management Transition* memorandum dated March 16, 2018 (the "Memo") prepared by WPI on behalf of Equilon.
3. *Closure Denial Review for Petroleum Underground Storage Tank Case, Shell #13-5244* dated March 1, 2017 (the "State Water Board's Closure Denial") prepared by the California State Water Board (State Water Board) which was prepared in response to ACDEH's *Response to Request for Closure* dated August 9, 2016 (the "ACDEH Closure Denial").

In accordance with the ACDEH's Closure Denial and the State Water Board's Closure Denial, 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 type="checkbox"/> f. Secondary Source	<input type="checkbox"/> 2. Petroleum Vapor Intrusion to Indoor Air
<input type="checkbox"/> c. Release Stopped	<input type="checkbox"/> g. MTBE	<input checked="" 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 ACDEH's 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, ACDEH's response to submittals, or other impediments to regulatory case closure are summarized in **Section III**.

Please note that as part of ACDEH's review of the Case files, ACDEH identified that there have been changes in the ownership of the property and/or additional responsible parties have been identified since the issuance of the last Notice of Responsibility (NOR) in December of 2006. As such, ACDEH will be issuing a revised NOR.

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."

The most recently updated CSM was provided in a report titled *Updated Site Conceptual Model* dated September 26, 2013.

ACDEH concurs with the State Water Boards conclusion that the CSM is not adequately complete to satisfy LTCP General Criteria e at this time. 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 the Media Specific Criteria for Groundwater and Direct Contact and Outdoor Air Exposure as discussed in **Section I.1** and **Section I.3** respectively. In addition, ACDEH has not identified an evaluation of exposure pathways and receptors as part of the most recent CSM.

A CSM that addresses the data gaps identified above and in **Section I.1** and **Section I.3** must be developed in order to satisfy LTCP General Criteria e.

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 the contaminant plume that exceeds water quality objectives (the "Groundwater Plume") is stable or decreasing in areal extent. Please note that the extents of the Groundwater Plume are defined by the water quality objectives and not by the LTCP closure criteria. The extents of the Groundwater Plume are undefined to the north, northwest, and west of monitoring well MW-5B in the Intermediate Aquifer and in all directions in the Deep aquifer. Therefore, the stability (and subsequently the maximum plume length) of the Groundwater Plume cannot be evaluated at this time.

ACDEH has evaluated the Site against the five Groundwater Site Classes identified in the LTCP. The criteria for each of the LTCP Groundwater Site Classes and the applicable current site conditions are summarized in Table 2 below. Based on ACDEH's review of the Case file, the Site does not meet any of the Groundwater Site Classes at this time

Table 2 - Summary of Groundwater Site Class Requirements and Current Site Conditions	Groundwater Site Class					Current Site Conditions ^A
	(1)	(2)	(3)	(4)	(5)	
Maximum plume Length (feet)	≤100	≤250	≤250	≤1,000	-	Unknown
Free Product not present [N] or removed to extent practicable [R] ^B	N	N	R	N	-	N
Distance to nearest water supply well or surface water body (feet)	≥250	≥1,000	≥1,000	≥1,000	-	500 west (Big Canyon Creek) & 2,000 south (water supply)
Benzene concentration in Groundwater (µg/L)	-	≤3,000	-	≤1,000	-	<0.50
MTBE concentration in groundwater (µg/L)	-	≤1,000	-	≤1,000	-	120
Land use restriction as a condition of closure	-	-	Yes	-	-	unknown
Regulatory low threat determination	-	-	-	-	Yes	-

"-" = criteria not applicable; "µg/L" = micrograms of analyte per liter of sample; ^A = Parameter value based on the CSM and the current groundwater data that represents the determining conditions for evaluation of groundwater site class; ^B = Free product may still be present below the site where the release originated, but does not extend off-site.

3. Direct Contact and Outdoor Air Exposure

"Release sites where human exposure may occur satisfy the media-specific criteria for direct contact and outdoor air exposure and shall be considered low-threat if they meet any of the following:

- Maximum concentrations of petroleum constituents in soil are less than or equal to those listed in [Table 3 below] for the specified depth below ground surface...; or*
- Maximum concentrations of petroleum constituents in soil are less than levels that a site specific risk assessment demonstrates will have no significant risk of adversely affecting human health; or*
- 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.*

Table 3 - Concentrations of Petroleum Constituents in Soil That Will Have No Significant Risk of Adversely Affecting Human Health (adapted from Table 1 of the LTCP)

Chemical	Residential		Commercial/Industrial		Utility Worker
	0 to 5 feet bgs (mg/kg)	5 to 10 feet bgs (mg/kg)	0 to 5 feet bgs (mg/kg)	5 to 10 feet bgs (mg/kg)	0 to 10 feet bgs (mg/kg)
Benzene	1.9	2.8	8.2	12	14
Ethylbenzene	21	32	89	134	314
Naphthalene	9.7	9.7	45	45	219
PAH	0.063	-	0.68	-	4.5

"mg/kg": milligrams of analyte per kilogram of sample; "PAH": Poly-aromatic hydrocarbons based on the seven carcinogenic ; "-": Not applicable;

ACDEH's review of the case file indicate that insufficient evidence has been presented to support the determination that **Media Specific Criteria for Direct Contact and Outdoor Air Exposure** have been satisfied, specifically:

- a. Naphthalene has not been evaluated in surface (0 – 5 feet below ground surface) or shallow (5 – 10 feet below ground surface) soils

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 4 – 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 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 type="checkbox"/>	Laboratory Electronic Data Files (EDF)
<input 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)

Details pertaining to the GeoTracker compliance issues identified in ACDEH's review of the case file are summarized below:

1. GEO_XY and GEO_Z data for Well MW-3R have not been submitted;
2. GEO_BORE data for MW-2, MW-4, MW-6, MW-12, CPT-1 and CPT-2 have not been submitted; and
3. A GEO_MAP has not been updated to include all sampling points and current or historical infrastructure.

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. Data Gap Evaluation & Work Plan
Compliance Date: August 17, 2018

Please prepare a Data Gap Evaluation & Work Plan to address impediments to closure identified above. This document must contain the following elements, at a minimum:

- a. A CSM describing current site conditions and identifying data gaps that must be addressed to satisfy LTCP closure criteria. 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.
- b. 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;
- c. 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
- d. A description of reporting requirements;

2. Project Meeting
Compliance Date: September 14, 2018

Please contact your primary caseworker to schedule a project meeting to discuss the Data Gap Evaluation, Work Plan, & Updated Site Conceptual Model and to discuss the path to closure for the Site. This meeting must be scheduled for a date no later than the compliance date listed above.

3. Semi-Annual Groundwater Monitoring and Status Report
Compliance Dates: July 30 and January 30 of each year

In accordance with the groundwater monitoring and sampling schedule, please submit a report on semi-annual groundwater monitoring efforts 30 days after the end of each semester.

IV. 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
<i>GeoTracker Compliance</i>	various	various	08/17/2018

V. 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)

Chris McDonald, WPI, Senior Engineer (sent via E-mail to: cmcdonald@wpinc.com)

ATTACHMENT A

LTCP Closure Criteria Evaluation Checklist

SHELL #13-5244 (T0600159797) - [MAP THIS SITE](#)

PUBLIC PAGE

8999 SAN RAMON
DUBLIN, CA 94568
ALAMEDA COUNTY
LUST CLEANUP SITE ([INFO](#))
STATUS: OPEN - VERIFICATION MONITORING

CLEANUP OVERSIGHT AGENCIES
ALAMEDA COUNTY LOP ([LEAD](#)) - CASE #: R00002744 - [JONATHAN E. SANDERS](#)
SAN FRANCISCO BAY RWQCB (REGION 2) - CASE #: NA - [Regional Water Board](#)

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

THIS PROJECT WAS LAST MODIFIED BY [JONATHAN E. SANDERS](#) ON 6/15/2018 3:00:21 PM - [HISTORY](#)

CLOSURE POLICY *THIS VERSION IS FINAL AS OF 6/15/2018* *CHECKLIST INITIATED ON 3/27/2013* [CLOSURE POLICY HISTORY](#)

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? YES NO

Name of Water System :
City of Dublin; however, groundwater in the area is used as a source of public 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

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 -

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](#) **NO**

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

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

Exposure Type :

Residential Commercial Utility Worker

Petroleum Constituents in Soil :

≤ 5 Feet bgs >5 Feet bgs and ≤10 Feet bgs Unknown

Soil Concentrations of Benzene :

> 1.9 mg/kg and ≤ 2.8 mg/kg > 2.8 mg/kg and ≤ 8.2 mg/kg > 8.2 mg/kg and ≤ 12 mg/kg > 12 mg/kg and ≤ 14 mg/kg > 14 mg/kg Unknown

Soil Concentrations of EthylBenzene :

> 21 mg/kg and ≤ 32 mg/kg > 32 mg/kg and ≤ 89 mg/kg > 89 mg/kg and ≤ 134 mg/kg > 134 mg/kg and ≤ 314 mg/kg > 314 mg/kg Unknown

Soil Concentrations of Naphthalene :

> 9.7 mg/kg and ≤ 45 mg/kg > 45 mg/kg and ≤ 219 mg/kg > 219 mg/kg Unknown

Soil Concentrations of PAH :

> 0.063 mg/kg and ≤ 0,68 mg/kg > 0.68 mg/kg and ≤ 4.5 mg/kg > 4.5 mg/kg Unknown

Area of Impacted Soil :

Area of Impacted Soil > 82 by 82 Feet Unknown

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, 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