



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

November 18, 2010

Ravi Nandwana  
RJP – ROF Jordan Ranch, LLC  
5000 Hopyard Road, Suite 170  
Pleasanton, CA 94588

Subject: SLIC Case RO0002918 and GeoTracker Global ID T06019797353, Jordan Ranch,  
4233 Fallon Road, Dublin, CA 94568

Dear Mr. Nandwana:

Thank you for the recently submitted document entitled, "Updated Corrective Action Plan," dated October 19, 2010, which was prepared by ENGEO, Incorporated (ENGEO) for the subject site. Alameda County Environmental Health (ACEH) staff has reviewed the case file including the above-mentioned work plan for the above-referenced site. ENGEO concluded that remedial excavation of the source area soil, groundwater extraction from the excavation pit, and in-situ chemical reagent injections combined is the most cost effective remedial alternative to reach the proposed cleanup levels and long-term cleanup goals for the site.

ACEH is not opposed to the remediation alternative presented in the above-mentioned report provided that the technical comments presented below are incorporated into a Final CAP. Please note that public participation is a requirement for the CAP process. Therefore, you are required to notify potentially affected stakeholders who live or own property in the area surrounding of the proposed remediation, described in the above-mentioned Feasibility Study, through the mailing of a fact sheet (enclosed). Please send us your personal certification that the fact sheet has been mailed to addresses listed in the enclosed List of Recipients.

Public comments on the proposed remediation will be accepted for a period of thirty days beginning Monday, November 22, 2010 through Wednesday, December 22, 2010. Following the public comment period, the comments received, including ACEH's technical comments described below, must be addressed and incorporated into a Final CAP.

#### **TECHNICAL COMMENTS**

1. **In-situ Chemical Oxidation** – ENGEO has proposed utilizing in-situ chemical reagent injections along with a remedial excavation and groundwater extraction to remediate the site. However, the specific chemical reagent proposed, baseline sampling prior to injections,

monitoring during the injections, and the number of installation points, locations, and frequency of applications were not adequately discussed in the report. At this time, please address the above-mentioned concerns in a Final CAP, due by the date specified below.

2. **Soil Remediation and Reuse** – ENGEO proposes to remediate the excavated soil onsite using enhanced biodegradation for onsite re-use. Prior to remediating the soil, ENGEO proposes to collect 4 discrete samples per 1,000 cubic yards of stockpiled soil for characterization. ACEH is not certain that four discrete samples per 1,000 cubic yards will adequately characterize the soil stockpile. According to the RWQCB, petroleum hydrocarbon impacted soil must be adequately characterized prior to proposed reuse<sup>1</sup>. Please provide justification using EPA SW-846 that the proposed number of samples will statistically characterize and represent contaminants in soil. Also, sampling locations should be random, uniform, or biased towards hotspot areas.

Also, it is not clear where onsite the treated stockpiled will be reused. In the Final CAP, due by the date specified below, please provide a discussion on the final disposition of the treated stockpiled soil. Also, note the Regional Board's conditions for soil reuse when preparing the discussion.

3. **Electronic Reporting** – A review of the case file and the State Water Resources Control Board's (SWRCB) GeoTracker website indicate that electronic copies of analytical data have not been submitted, rendering the site to non-compliance status. Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. Also, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude to sub-meter accuracy using NAD 83. A California licensed surveyor may be required to perform this work. Additionally, pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3893, 3894, and 3895, beginning July 1, 2005, the successful submittal of electronic information (i.e. report in PDF format) shall replace the requirement for the submittal of a paper copy. Please complete the surveying and upload all applicable electronic submittal types such as the analytical data (EDF), survey data (GEO\_XY and GEO\_Z), and PDF reports from July 1, 2005 to current to GeoTracker by the date specified below. Electronic reporting is described below.

### **TECHNICAL REPORT REQUEST**

Please submit technical reports to ACEH (Attention: Paresh Khatri), according to the following schedule:

- **December 6, 2010** – GeoTracker/ACEH FTP Electronic Submittals Compliance

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<sup>1</sup> Technical Reference Document, *Characterization and Reuse of Petroleum Hydrocarbon impacted soil as Inert Waste*, Draft, San Francisco Bay Regional Water Quality Control Board, October 20, 2006.

- **December 22, 2010** – End of 30-day Public Participation Period
- **January 7, 2011** – Final CAP
- **Due within 30 Days of Sampling** – Semi-annual Monitoring Report (1<sup>st</sup> Quarter 2011)
- **Due within 30 Days of Sampling** – Semi-annual Monitoring Report (3<sup>rd</sup> Quarter 2011)

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 777-2478 or send me an electronic mail message at [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org).

Sincerely,

Paresh C. Khatri  
Hazardous Materials Specialist

Enclosure:      Public Participation Fact Sheet  
                     List of Recipients  
                     Responsible Party(ies) Legal Requirements/Obligations  
                     ACEH Electronic Report Upload (ftp) Instructions

cc:      Shawn Munger, ENGEO, 2010 Crow Canyon Place, Suite 250, San Ramon, CA 94583  
            Cheryl Dizon (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore,  
            CA 94551 (*Sent via e-mail to: [cdizon@zone7water.com](mailto:cdizon@zone7water.com)*)  
            Donna Drogos, ACEH (*Sent via E-mail to: [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org)*)  
            Paresh Khatri, ACEH (*Sent via E-mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org)*)  
            GeoTracker  
            File



**FACT SHEET ON ENVIRONMENTAL ASSESSMENT  
JORDAN RANCH**

4233 Fallon Road, Dublin, CA 94568  
Fuel Leak Case No. RO0002918 and  
GeoTracker Global ID T06019797353

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

Site Remediation Summary

This fact sheet has been prepared to inform community members and other interested stakeholders regarding the status of a proposed soil and groundwater cleanup at Jordan Ranch located at 4233 Fallon Road in Dublin, California. The Responsible Party for the case BJP-ROF Jordan Ranch and their environmental consultant ENGENO are proposing soil excavation, groundwater pumping, and in-situ chemical reagent injections as remediation technologies to cleanup the site.

Site Background

The Site is a ranch complex located at 4233 Fallon Road in Dublin. The 10 to 15 acre ranch complex is a portion of a larger approximately 200-acre parcel. The ranch complex was recently demolished, however, remnant foundations and fencing remain at the property. The previous development included a ranch house, a decorative pond, several barns and equipment sheds. A former underground fuel storage tank was located just south of one the barn structures. Soil and groundwater sampling has confirmed the presence of chemicals (petroleum hydrocarbons) in soil and groundwater beneath the Site.

Soil Excavation, Groundwater Extraction & In-situ Injection

Soil excavation is proposed to remediate the soil contamination over an area 25 feet long by 25 feet wide by 25 feet deep at the site, using conventional earth moving equipment. Contaminated soils will be quickly removed using a large excavator. Contaminated groundwater encountered in the excavation will be pumped and disposed of off-site. An enhanced biodegradation reagent will be injected in the subsurface (in-situ injections) overlying areas of residual groundwater contamination.

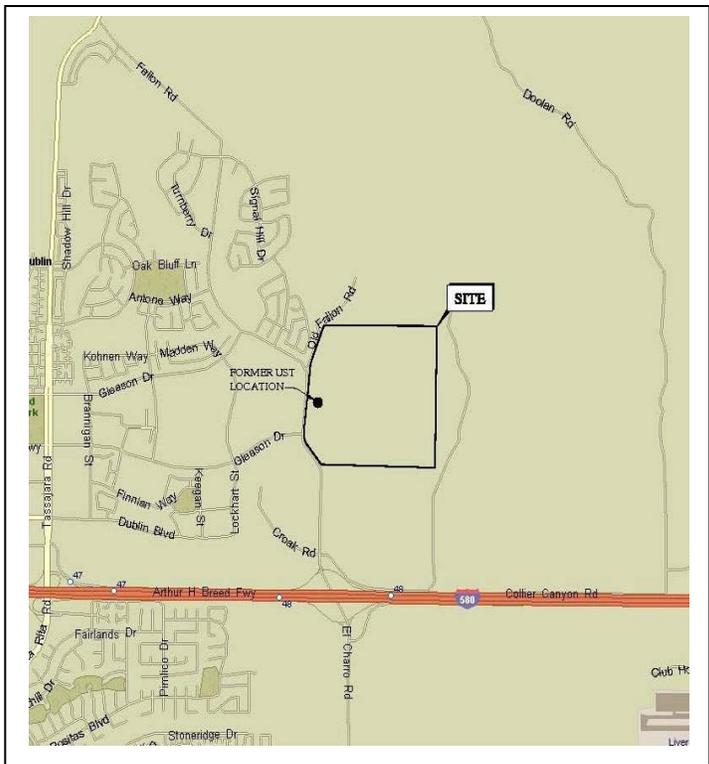
This method is effective because it would remove contaminated soil, which would be confirmed by soil, groundwater sampling, and the in-situ injections would accelerate biodegradation of the residual contamination.

*For Additional information, please contact:*

Paresh Khatri	Shawn Munger
Alameda County Environmental Health	ENGENO
1131 Harbor Bay Parkway, Ste 250	2010 Crow Canyon Place, Suite 250
Alameda, CA 94502	San Ramon, CA 94583
Phone: 510-777-2478	Phone: 925-866-9000
E-mail: Paresh.Khatri@acgov.org	E-mail: SMUNGER@engeo.com

Next Step

The Responsible Party is working with Alameda County Environmental Health (ACEH) to implement a soil and groundwater cleanup at the site. The proposed alternative is described in a report prepared by ENGENO on the Responsible Parties behalf: "Updated Corrective Action Plan," dated October 19, 2010. The public is invited to review and comment on the cleanup action proposed in the Report. The report is available on ACEH's website (<http://www.acgov.org/aceh/lop/ust.htm>) or the State Water Resources Control Board's GeoTracker website (<http://www.geotracker.waterboards.ca.gov/>). The report and case file are also available for review at the ACEH located at 1131 Harbor Bay Parkway in Alameda, California. Please send a fax to 510-337-9335 to request a date and time to review the case file. Please send written comments regarding the corrective action to Paresh Khatri or Shawn Munger at their respective address below. All written comments received by **December 22, 2010** will be forwarded to the Responsible Party and will be considered and responded to prior to a final determination on the proposed cleanup.



List of Recipients  
RO0002918  
November 18, 2010

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CROAK FRANCIS P  
1262 GABRIEL CT  
SAN LEANDRO CA 94577

DUBLIN RE INVESTORS LLC  
4155 BLACKHAWK PLAZA CIR #201  
DANVILLE CA 94506

RESIDENT  
4730 CROAK RD  
LIVERMORE CA 94550

CITY OF DUBLIN  
P.O. BOX 2340  
DUBLIN CA 94568

RESIDENT  
4233 FALLON RD  
LIVERMORE CA 94550

BJP ROF JORDAN RANCH LLC  
5000 HOPYARD RD #170  
PLEASANTON CA 94588

DUBLIN RANCH GOLF CLUB HOMEOWNERS  
ASSOCIATION  
315 DIABLO RD #221  
DANVILLE CA 94526

COVARRUBIAS HUMBERTO & ERNESTINE  
TRS  
4897 PIPER GLEN TER  
DUBLIN CA 94568

HUR PHILLIP  
4883 PIPER GLEN TER  
DUBLIN CA 94568

UOO ALEXANDER  
4869 PIPER GLEN TER  
DUBLIN CA 94568

OSE SCOTT & AIMEE  
4855 PIPER GLEN TER  
DUBLIN CA 94568

BRADDOCK & LOGAN GROUP II LP  
4155 BLACKHAWK PLAZA CIR #201  
DANVILLE CA 94506

RESIDENT  
5781 FALLON RD  
LIVERMORE CA 94551

LAU BENJAMIN & LOUIE ANNIE  
4830 SCALA CT  
DUBLIN CA 94568

WITTERS GREGG T  
4835 SCALA CT  
DUBLIN CA 94568

KB HOME SOUTH BAY INC  
6700 KOLL CENTER PKWY #200  
PLEASANTON CA 94566

RESIDENT  
4843 SCALA CT  
DUBLIN CA 94568

RESIDENT  
4849 SCALA CT  
DUBLIN CA 94568

RESIDENT  
4832 LA VINA ST  
DUBLIN CA 94568

RESIDENT  
4826 LA VINA ST  
DUBLIN CA 94568

RESIDENT  
4820 LA VINA ST  
DUBLIN CA 94568

RESIDENT  
4815 LA VINA ST  
DUBLIN CA 94568

RESIDENT  
4821 LA VINA ST  
DUBLIN CA 94568

List of Recipients  
RO0002918  
November 18, 2010

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RESIDENT  
4837 LA VINA ST  
DUBLIN CA 94568

RESIDENT  
2320 W CANTARA DR  
DUBLIN CA 94568

RESIDENT  
2316 W CANTARA DR  
DUBLIN CA 94568

RESIDENT  
2308 W CANTARA DR  
DUBLIN CA 94568

BRADDOCK & LOGAN GROUP II LP  
P O BOX 5300  
DANVILLE CA 94526

## 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.swrcb.ca.gov/ust/electronic\\_submittal/report\\_rqmts.shtml](http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml)).

### 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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> July 20, 2010
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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 [dehloptoxic@acgov.org](mailto:dehloptoxic@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.
  - 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 [dehloptoxic@acgov.org](mailto:dehloptoxic@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.