

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**  
AGENCY

COLLEEN CHAWLA, Director



DEPARTMENT OF ENVIRONMENTAL HEALTH  
LOCAL OVERSIGHT PROGRAM (LOP)  
For Hazardous Materials Releases  
1131 HARBOR BAY PARKWAY, SUITE 250  
ALAMEDA, CA 94502  
(510) 567-6700  
FAX (510) 337-9335

January 30, 2018

Bancroft and 77<sup>th</sup>, LLC  
Attention: Ms. Victoria Vela  
12020 Garfield Avenue,  
South Gate, CA 90280  
(Sent via e-mail to: [v.vela@pwslaundry.com](mailto:v.vela@pwslaundry.com))

Ms. Carryl MacLeod  
Chevron Environmental Management Company  
6101 Bollinger Canyon Road  
San Ramon, CA 94583-2324  
(Sent via e-mail to: [CMacleod@chevron.com](mailto:CMacleod@chevron.com))

Bancroft Associates, LLC  
Attention: Mr. Justin Smith  
Address Unknown

Justin E. Smith and William C. Randall  
Address Unknown

Cathleen Maynard Trust  
Address Unknown

Earl L. & Marjorie E. Lupton, Jr. Trust  
Address Unknown

Kee S. & Ip C. Lee  
4461 Cerritos Avenue  
Cypress, CA 90630-4217

Bank of America NT&SA  
c/o National Convenience Stores, Inc.  
100 N. Tryon Street  
Charlotte, North Carolina, 28202

National Convenience Stores Inc.  
c/o CST Brands, Inc.  
Attention: Mr. Gerard Sonnier  
One Valero Way Building D, Suite 200  
San Antonio, Texas 78249  
(Sent via e-mail to: [Gerard.Sonnier@cstbrands.com](mailto:Gerard.Sonnier@cstbrands.com))

Valero Energy Corporation  
One Valero Way  
San Antonio, Texas 78249

Subject: Technical Report Request for Fuel Leak Case No. RO0003115 and GeoTracker Global ID T10000004796, Stop N Go Gas Station, 7701 Bancroft Avenue, Oakland, CA 94605

Ladies and Gentlemen:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the Revised *Site Conceptual Model (SCM) and Data Gap Work Plan (Work Plan)* dated November 9, 2017 prepared and submitted on your behalf by PANGEA Environmental Services, Inc. (Pangea). The Work Plan was originally submitted in response to ACDEH's January 5, 2016 Directive Letter. Thank you for submitting the Work Plan and Soil Gas Sampling Report.

Based on ACDEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org)) prior to the start of field activities.

### **TECHNICAL COMMENTS**

- 1. Proposed Source Area Assessment Soil Sample Depths:** The Work Plan proposes soil sample collection between 0 and 5 feet, 5 and 10 feet, and between 10 to 15 feet below ground surface (bgs). However, as first described in ACDEH's February 10, 2014 Directive Letter, due to the lack of USTs, pump island (s), and fuel lines removal documentation, insufficient data and analysis has been

presented to assess compliance with LTCP General Criteria f, that secondary source has been removed to the extent practicable. Total Petroleum Hydrocarbon as motor oil (TPHmo) was detected at 4,500 milligrams per kilogram (mg/kg) at 14 feet bgs in GP-5 located in the southwest corner of the site. In addition to the proposed sampling, please provide vertical definition for all soil borings by collection of soil samples at the groundwater interface, lithologic changes, and at areas of obvious impact (such as staining, odor, Photoionization Detector (PID) readings, soil color changes) and analysis of soil and groundwater samples by the analyses proposed in the work plan.

2. **Proposed Source Area Assessment Soil Analyses:** Please specify Selected Ion Monitoring (SIM) mode when requesting Polyaromatic Hydrocarbon (PAH) analysis by EPA Method 8270 for the soil samples to assess compliance with LTCP Media Specific Direct Contact to Outdoor Air. SIM mode provides lower detection limits for the seven carcinogenic PAHs as benzo(a)pyrene toxicity equivalent [BaPe].
3. **Environmental Screening Levels (ESLs):** Please utilize Version 3 of the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) ESLs updated in February 2016.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **March 31, 2018** – Soil and Groundwater Investigation and Updated SCM Report  
File to be named: RO3115\_SWI\_SCM\_R\_yyyy-mm-dd

This report is 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. Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please send me an e-mail message at [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org) or call me at (510) 567-6708.

Sincerely,

Karel Detterman, P.G.  
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements/Obligations Electronic Report Upload (ftp) Instructions

cc: Kathleen Clack, Law Offices (sent via e-mail to: [kpc@clacklaw.com](mailto:kpc@clacklaw.com))  
Brad Steinberg, PWS Laundry, (sent via e-mail to: [bsteinberg@pwslaundry.com](mailto:bsteinberg@pwslaundry.com))  
Daniel A. Robinson, Esq., CST Brands, Inc. (Sent via e-mail to: [daniel.robinson@cstbrands.com](mailto:daniel.robinson@cstbrands.com))  
Sharon Vasquez, Chevron, (sent via e-mail to: [sharonvasquez@chevron.com](mailto:sharonvasquez@chevron.com))  
Robert Goodman, (sent via e-mail to: [rgoodman@rjo.com](mailto:rgoodman@rjo.com))  
Brian Silva, GHD, (sent via e-mail to: [brian.silva@ghd.com](mailto:brian.silva@ghd.com))  
Kerri Barsh, Greenberg Traurig, (sent via e-mail to: [barshk@gtlaw.com](mailto:barshk@gtlaw.com))  
John Chibbaro, Greenberg Traurig, (sent via e-mail to: [chibbaroj@gtlaw.com](mailto:chibbaroj@gtlaw.com))  
Dilan Roe, ACDEH, (sent via e-mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))  
Karel Detterman, ACDEH, (sent via e-mail to: [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org))  
Paresh Khatri, ACDEH, (sent via e-mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org))  
Case Electronic File, GeoTracker

<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.