ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY



COLLEEN CHAWLA, Director

February 21, 2018

Mr. Harry Zhang (Sent via electronic mail to: <u>HarryZhang56@gmail.com</u>) Reveriez Construction, Inc. 598 London Street San Francisco, CA 94112

Subject: Conditional Approval of the *Revised Soil and Groundwater Investigation Work Plan*, Site Cleanup Program Case No. RO0003265 and GeoTracker Global ID T10000011156, 229 International Boulevard Property located at 229-255 International Boulevard (APN 20-127-6-3), Oakland, CA 95205

Dear Mr. Zhang:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the site cleanup case file for the above referenced site including the *Revised Soil and Groundwater Investigation Workplan* (the Work Plan), dated January 29, 2017, prepared by Almar Environmental (Almar) on your behalf and electronically received by ACDEH on January 30, 2018. The Work Plan was revised based on a meeting with you, your environmental consultants, and ACDEH on January 12, 2018 to discuss the locations of borings to further investigate subsurface conditions at the site.

ACDEH understands the Site is located at 229 and 255 International Boulevard at the northeast corner of the intersection of 3rd Avenue and International Boulevard. The Site is currently a vacant lot developed with a single building, paved parking area and an area with exposed dirt. The Site consists of one parcel (APN above) and is surrounded by residential and sparse commercial properties. ACDEH also understands that proposed redevelopment of the property will include an eight story residential building with a subterranean garage and loading areas in the basement, commercial space, residential lobby, loading area and parking on the first floor, and residential condominium units on floors 2 through 7. The building will include 3 elevators (2 residential and 1 freight). Proposed redevelopment plans include the over-excavation of soils along the entire property to a depth of approximately 8 feet below ground surface to facilitate construction of the underground parking garage. ACDEH understands that the building footprint will occupy the entire property (e.g., lot-line to lot-line) and will have a vapor barrier installed beneath the entire building footprint including elevator shafts. Proposed redevelopment has been approved by the City of Oakland Planning Department and the City of Oakland Building Department has issued a demolition permit (#BLN704309) for the Site, however, has required the applicant to obtain environmental clearance from ACDEH for the proposed redevelopment. Proposed redevelopment plans and cross-sections are included in Appendix A of the Work Plan, however, no copies of the City of Oakland planning approvals and permits associated with the proposed redevelopment have been submitted as requested by ACDEH in our directive letter dated December 21, 2017 and in discussions in and our subsequent meeting on January 12, 2018.

Due to soil and groundwater contamination at the site, ACDEH requested preparation of a Soil Management Plan (SMP) as a condition of approval for building demolition at 255 International Boulevard. In our directive letter dated December 21, 2017, ACDEH approved a *Soil Management Plan for Building Demolition of 255 International Boulevard*, dated November 2017 for the Site. Although the SMP establishes a decision-making structure to assist the construction team in the identification and

Mr. Zhang RO0003265 February 21, 2018, Page 2

management of contaminated media during site investigation and redevelopment activities, ACDEH granted approval for demolition of the outer and inner concrete walls of the building located at 255 International Blvd (only) to allow unrestricted drill/sample-rig access over the cement foundation during investigation and site characterization to evaluate risks associated with site redevelopment. ACDEH understands that this demolition has been completed and notes that no other ground disturbing activities may be conducted at the site including but not limited to foundation demolition, subsurface demolition, and grading activities until the proposed environmental investigation activities presented in the Work Plan are completed at the site and results submitted to ACDEH for review.

Qualitative results from the previous Phase II Investigation, conducted by Phase-1 Environmental Consultants in August 2017, indicated total petroleum hydrocarbons (TPH) as gasoline (g) were reported in groundwater above San Francisco Bay Regional Water Quality Control Board's (Regional Water Board) Environmental Screening Levels (ESLs) beneath the building located 255 International Blvd. Due to the presence of groundwater contamination at the site from past historic land use including a commercial fueling facility, auto repair, and printing facility, additional subsurface characterization and delineation investigations are necessary in order to safely prepare the site for redevelopment.

As discussed by Almar, the proposed scope of work presented in the above-mentioned Work Plan consists of the advancement of 12 borings for collection of soil and grab groundwater samples (DP-1 through-DP-12) to: 1) confirm the initial qualitative results of the initial Phase II, 2) further assess the extent of onsite subsurface contamination, and 3) characterize in situ soils scheduled to be over-excavated during redevelopment for offsite disposal. The locations of the borings were selected based on past historic land use including: borings DP-1 through DP-3 in the area of the former "Oil and Gas" station, borings DP-4 and DP-5 in the area of the former auto repair shop, borings DP-6 and DP-7 in the area of the former printing shop, and the remainder of the borings (DP-8 through DP-12) spread out across the site as possible to cover any unknown historical use.

The Work Plan states that a reinforced concreted slab floors currently remains at 255 International Boulevard which would cause the geophysical survey to be ineffective. As a result, Almar recommends the geophysical survey be performed after the concrete slab floor is removed. ACDEH concurs with this recommendation and requests a geophysical work plan for ACDEH approval prior to conducting the work.

Please note, based on the analytical results from the approved scope of work in this Work Plan, additional site characterization activities may be required including but not limited to soil gas samples to characterize vapor partitioning off of groundwater if warranted.

Based on our review, ACDEH conditionally approves the Work Plan and requests that you address the Technical Comments regarding the Work Plan below, perform the proposed work, and submit the requested *Deliverables* to the State Water Resources Control Board's GeoTracker website in accordance with the compliance schedule provided below and the *Responsible Party (ies) Legal Requirement/Obligations Instructions* and *File Naming Conventions* which are included as Attachments 1 and 2 respectively. ACDEH requests email notification verifying the requested deliverables have been uploaded to Geotracker (e-mail preferred to: andrew.york@acgov.org).

Mr. Zhang RO0003265 February 21, 2018, Page 3

TECHNICIAL COMMENTS

Please address the comments below and incorporate during implementation of the scope of work presented in the Work Plan.

 <u>Task 2: Drilling and Soil Sampling</u> – The work plan is not clear whether a photoionization detector (PID) or similar gas detector will be used during drilling activities. ACDEH request that a portion of the soil from each five foot interval be collected and placed in a sealable plastic bag to allow the pore space to volatilize. Headspace in the plastic bag will be screened in the field and readings recorded on the boring log. ACDEH requests that if PID readings or subsurface fill is encountered additional samples be collected at this depth and noted on boring logs.

ACDEH notes that the scope of work does not discuss coring through the concrete slab during advancement of borings DP-1 through DP-3 and DP-12 which are proposed within the footprint of the existing concrete slab. As discussed above, the concrete slab at this location must remain in place (and therefore must be cored) until the proposed subsurface investigation outlined in the Work Plan is complete and results submitted to ACDEH for review.

- 2. <u>Task 3: Groundwater Sampling</u> Little detail is presented in the Work Plan regarding groundwater development prior to grab sample collection. ACDEH requests that your environmental consultant follow the low-flow purging (less than 1 liter per minute or 0.25 gallon per minute) and sampling techniques in general accordance with the Department of Toxic Substances Control's (DTSC's) *Representative Sampling of Groundwater for Hazardous Substances* dated July 1995 and revised February 2008 (the Guidance Manual for Groundwater Sampling) and the DTSC's *Guidelines for Planning and Implementing Groundwater Characterization of Contaminated Sites* dated June 2012. These procedures include field measurements, collected at regular intervals of water-quality indicators such as pH, temperature, dissolved oxygen (DO), oxidation / reduction potential (ORP), turbidity, and specific conductivity of the extracted water be monitored throughout the purging process within a flow-through cell (e.g., YSI® Sonde). Purging should continue until conditions are stable (i.e., the variance between sequential conductivity measurements is 10% or less) before a sample is collected.
- 3. <u>Task 4: Laboratory Analysis Soil and Groundwater</u> The Work Plan states that soil samples will be collected to further assess the extent of onsite subsurface contamination and characterize in-situ soils to be over-excavated during redevelopment for off-site disposal. The Work Plan proposes the following laboratory analysis including Total Petroleum Hydrocarbons as gasoline (TPHg) and a full suite of volatile organic compounds (VOCs) by EPA Test Method 8260b. Due to past historic land use including a commercial fueling facility, auto repair, wrecked or abandoned vehicle storage, and printing facility, ACDEH requests that additional potential chemicals of concern (PCOCs) associated with historic land use be evaluated to assess on-site impacts as well as collect data for future off-site disposal. The requested soil analysis includes semi-volatile organic compounds (SVOCs) by EPA Method 8270, CAM-17 metals by EPA Method 6010, TPH as diesel (-d) and motor oil (-mo) by EPA Method 8015, and poly chlorinated biphenyl's (PCBs) by EPA Method 8082

Based on the soil analytical results presented from this Work Plan, additional analyses may be required at a later date in order to evaluate groundwater.

Mr. Zhang RO0003265 February 21, 2018, Page 4

DELIVERABLES

Please submit the following deliverables according to the following schedule:

- 1. <u>Baseline Project Schedule</u> A project schedule providing details of the sequencing of corrective actions and site improvement activities and submittal of requisite reports and documentation listed below. The schedule shall include at a minimum the following activities: Soil and Groundwater Investigation Report, Additional Geophysical Investigation Work Plan and Report, Corrective Action Plan (CAP), 30-day public participation, revised City of Oakland approved building and planning department permits with vapor mitigation measures incorporated, remediation of soil and groundwater (if required), soil export characterization analytical data and waste manifests, Construction SMP Compliance Report, Corrective Action Completion Report, Vapor Mitigation System (VMS) Record Report of Construction, Long Term Site Management Plan (SMP) if required and Land Use Covenant, if required. The schedule must include appropriate ACDEH review and response times for document submittals in addition to a 72-hour notification to ACDEH prior to implementation of corrective actions. The Baseline Project Schedule shall be updated as necessary to reflect the current status of the project and must submitted to ACDEH for review and approval.
 - March 23, 2018 Project/Development Schedule File to be named: DEV_SCHD_yyyy-mm-dd
- 2. <u>Planning Approvals and Building Permit Plans</u> A copy of the City of Oakland Building and Planning approvals for the redevelopment project and the approved building permit plan construction sets documenting compliance with the conceptual plans. ACDEH must be notified if the project proponent or the City Planning or Building Departments propose changes to the site development and first floor building plans. Any substantial changes made to the plans without review by ACDEH may invalidate the conclusions of the protectiveness of the proposed redevelopment of the site with respect to potential residual contamination.
 - March 23, 2018 Building and Planning Permit/Plans Approved File to be named: DEV_PLAN_yyyy-mm-dd
- <u>Subsurface Investigation Report</u> A technical report documenting the results of the scope of work presented in the approved Work Plan.
 - Date to be Determined based on Project Schedule Subsurface Investigation Report File to be named: SWI_R_yyyy-mm-dd
- <u>Geophysical Investigation Work Plan</u> A work plan for proposed geophysical investigation after removal of the slab:
 - Date to be Determined based on Project Schedule Geophysical Investigation Work Plan File to be named: SWI_WP_yyyy-mm-dd
- 5. <u>GeoTracker Database Compliance</u> Site data and documents are maintained in the State Water Board's GeoTracker website. The database acts as repositories for Portable Document Format (PDF) files of regulatory directives and reports and has the functionality to store electronic compliance data in Electronic Deliverable Format (EDF) including analytical laboratory data for

soil, vapor, and groundwater samples, monitoring well depth-to-water measurements, and surveyed location and elevation data for sampling locations.

A review of the State Water Board's GeoTracker database indicates that this site is not in compliance with the State's electronic submittal requirements. As a result, ACDEH requests Phase I upload all historical environmental documents related to the subject site including but not limited the missing Phase I Report, redevelopment plans, and associated electronic laboratory data to GeoTracker. See Attachment 1 regarding electronic submittal requests to GeoTracker. Notification of, and a list of, the documents uploaded to GeoTracker can be emailed to my attention (Attention Drew York).

• March 30, 2018 – GeoTracker Electronic Submittals File to be named: Naming conventions for GeoTracker uploads is included in Attachment 2

Thank you for your cooperation. ACDEH looks forward to working with you and your redevelopment team to advance the case toward closure. If you have any questions, please call me at (510) 639-1276 or send me an email message at <u>andrew.york@acgov.org</u>.

Sincerely,

Drew J. York Senior Hazardous Materials Specialist

Dilan Roe, PE, C73703 Chief - Land Water Division

- Encl.: Attachment 1 Responsible Party (ies) Legal Requirement/Obligations Instructions Attachment 2 – Electronic File Naming Conventions
- cc: Stuart Solomon, Phase-1 (Sent via E-mail to: <u>stuart@phase-1environmental.com</u>) Forrest Cook, Almar Environmental (Sent via E-mail to: <u>cook.forrest@gmail.com</u>) Tim Lowe, City of Oakland Building Department (Sent via E-mail to <u>TLow@oaklandnet.com</u>) Dilan Roe, ACDEH, Chief Land, and Water Division (Sent via E-mail to: <u>dilan.roe@acgov.org</u>) Paresh Khatri, ACDEH (Sent via E-mail to: <u>paresh.khatri@acgov.org</u>) Drew York, ACDEH (Sent via E-mail to: <u>andrew.york@acgov.org</u>) Electronic File, GeoTracker

ATTACHMENT 1

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 (<u>http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/</u>)

- 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	Sampl e Period	PDF Report	GEO_ MAPS	Sample ID	Matrix	GEO _Z	GEO _XY	GEO_ BORE	GEO_WEL L	EDF
2016 Subsurface Investigation Report	2016 S1	~	•	Effluent	SO					✓
2012 Site Assessment Work Plan	2012	~	~							
2010 GW Investigation	2008 Q4	✓	✓	SB-10	W	~				✓
Report				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: <u>https://www.waterboards.ca.gov/water_issues/programs/ustcf/</u>

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 2

	REVISION DATE: August 1, 2017		
	PREVIOUS REVISIONS:		
Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	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 & Procedu	res SUBJECT: File Names for Electronic Reports		
Format: REPORT_NA Ex: SWI_R_V0	ME_R_YYYY-MM-DD DL1_2006-05-25		
LOP and SO INCOMING REPOR			
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 Plans (Includes Plan Set, Cross-sections, and Related Drawings)	DEV_PLAN_date		
Development Schedule (Project Schedule, Gant Chart, etc.)	DEV_SCHD_date		
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	IR_R
Reports, Free Product Removal Reports, & Dual-Phase Extraction Reports)	
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_date
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_DATE
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_
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	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

LOP and SLIC ACEH OUTGOING LETTERS AND CASE FILE DOCUMENTATION			
Document Name	Abbreviation		
	File Name= Abbreviation + Date (yyyy-mm-dd)		
90 Day Letter	90D_L		
CAP Approval	CAP_AP_L		
RP Certification of Public Notice	CAP_CERT_L		
CAP Public Participation Letter	CAP_PP_L		
CAP Public Participation Letter to RP	CAP_PPRP_L		
Certified Mail Receipt	CERT_MAIL_RECEIPT		
Cleanup and Abatement Order	CAO_L		
Closure Public Participation Letter	CL_PP_L		
Closure Package (Letter, RACC, Summary, Deed Restriction)	CLOS_L		
Correspondence	CORRES_L		
Deed Restriction	DEED_L_ (Copied from CLOS_L_)		
Directive Letter containing Public Notice and/or Landowner request form	DIR_PP_L		
Directive Letter (Landowner form, site management requirements, well decommission scheduling prior to closure of PP, copy of PP to all RPs)	DIR_L		
Enforcement	ENF_L		
Enforcement Referral Letter	ENF_REF_L		
Extension Approval Letter	EXT_AP_L		
Extension Denial Letter	EXT_DNY_L		
Fund Requests	FUND_REQ_L		
Final Voluntary Remedial Action Agreement	FVRAA_date		
GeoTracker info	GEOTRACK_R		
Late Letter	LATE_L		
List of Landowners Forms	LNDOWNR_F_DATE		
Mailing List for Public Notice in Excel Format	MAIL_PP_DATE		
Maps & Assessor's Parcel Information	MAPS_ASSESSOR (no date)		
Meeting Agenda, Minutes, Sign in Sheet	MEETING		
Miscellaneous Letter	MISC_L		
New Landowner Letters	LNDOWNR_REQ_L		
Notice of Responsibility	NOR_L		
Notice of Violation	NOV_L		
Phone Log	PHONE_LOG		
Photos	PHOTO_date		
Post Closure Monitoring	PCMP_L		
QA/QC Checklist (confidential)	QAC_report name_date		
Responsible Parties Information	RPINFO_L_DATE OF THE LETTERHEAD		
Returned Mail	RTN_MAIL_date		

Site Visit/Inspection Report	SITEVISIT_R
Transfer Letter	TRANS_L
UST Permit	UST_PRMT
Voluntary Remedial Action Notice to State Agencies	VRA_NOTICE
Voluntary Remedial Action Request Form from RP	VREQ_F