

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 15, 2018

**3014 Chapman Street LLC**  
**c/o Claire Han, Madison Park Financial**  
155 Grand Ave, 10th Floor  
Oakland CA, 94612-3758  
(Sent via E-mail to Claire@mpfcorp.com)

**Rembert Paul Tr & Rembert Paul & Alexander M  
Etal**  
715 Laurent St  
Santa Cruz CA, 95060-3549

**Rembert Alexander M & Jonesrembert Marie T  
Trs Etal**  
Address Unknown

**Rembert Paul Tr & Rembert Alexander & Jonesre  
Etal**  
Address Unknown

**Rembert Paul & Nancy Trs Etal**  
Address Unknown

**Rembert Nancy J Etal**  
**c/o Robert W Islip**  
Address Unknown

**Gallot P E Jr Tr**  
Address Unknown

**Gallot P E Jr & Marian L**  
Address Unknown

**Subject: Subsurface Investigation and Excavation Report Review and Work Plan Acceptance  
Leaking Underground Storage Tank (LUST) Cleanup Site Case No. RO00003288  
GeoTracker Global ID T10000011193  
3014 Chapman Street Redevelopment  
3030 Chapman Street, Oakland, CA 94601**

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. *Subsurface Investigation and Excavation Report* dated March 26, 2018 (the "Investigation Report") prepared by P&D Environmental, Inc. (P&D) on behalf of 3014 Chapman Street, LLC and submitted to ACDEH as requested in ACDEH's directive letter dated January 26, 2018.

The Investigation Report documented (1) the characterization and disposal of waste (soil, water, and piping) associated with the excavation and removal of on-site Underground Storage Tanks (USTs) and associated piping; (2) soil sampling associated with the removal of piping; (3) Characterization of imported fill materials and location of backfilling; and (4) a work plan to address data gaps identified at the Site.

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 checked="" type="checkbox"/> a.	<input checked="" type="checkbox"/> e.	<input checked="" type="checkbox"/> 1. Groundwater	
<input type="checkbox"/> b.	<input type="checkbox"/> f.	<input type="checkbox"/> 2. Petroleum Vapor Intrusion to Indoor Air	
<input type="checkbox"/> c.	<input type="checkbox"/> g.	<input checked="" type="checkbox"/> 3. Direct Contact and Outdoor Air Exposure	
<input type="checkbox"/> d.	<input type="checkbox"/> h.		

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 response to the documents listed above 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*.

**General Criteria**

**a. The unauthorized release is located within the service area of a public water system**

*“For the purposes of this policy, a public water system is a system for the provision of water for human consumption through pipes or other constructed conveyances that has 15 or more service connections or regularly serves at least 25 individuals daily at least 60 days out of the year.”*

*“...Case closure outside of areas with a public water system should be evaluated based upon the fundamental principles in this policy and a site specific evaluation of developing water supplies in the area.”*

Supporting documentation that area(s) with soil and groundwater contamination are located within a service area for a public water system have not been provided at this time. This data gap must be addressed before ACDEH can make a determination that **General Criteria a**. is satisfied.

**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 Investigation Report states that a tabular CSM has been prepared and was reportedly included in Appendix F, however, the copy of the Investigation Report uploaded to GeoTracker does not include an Appendix F. A copy of the CSM must be provided to ACDEH before ACDEH can make a determination that **General Criteria e** is satisfied.

Data gaps identified by ACDEH that are not associate with media specific criteria are summarized below:

1. A utility survey has not been conducted at the Site. In order to assess potential preferential pathways for contaminant migration, exposure pathways, and receptors, a utility survey must be completed at the Site.

2. An evaluation of potentially complete exposure pathways and receptors has not been completed for the Site.
3. Identification of constituents of concern (COC) and data quality objectives (DQO) have not been reported to ACDEH at this time. ACDEH notes that detections of gasoline range, diesel range, motor oil range, and bunker oil range petroleum products have been reported in soil and groundwater. ACDEH further notes that (a) Analyst notes indicate that the detections of some of these constituents are not typical of their parent reported species; (b) There is overlap in these petroleum ranges; and (c) Lubricating solvents have not yet been identified as a potential COC. COCs must be identified and supported with technical justification. If known, the COCs should be associated with known historical land uses.

**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 <sup>A</sup> [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; <sup>A</sup> = 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 for Groundwater:

- a. The aerial extent of the groundwater plume that exceeds water quality objectives has not been delineated to the north; Delineation of the aerial extent of the groundwater plume that exceeds water quality objectives is a requisite to satisfy any of the groundwater site classes and to evaluate the maximum plume length and stability of the plume.
- a. Distance to nearest surface water body or water supply well has not been reported; ACDEH notes that the San Francisco Bay tidal canal is identified as 960 feet south-southwest of the Site, however, the canal is identified in the context of a hydrogeological influencer and the Investigation Report does not identify if this is the nearest surface water body.

**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:*

- b. 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*
- c. 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*
- d. 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. **Unevaluated PAH:** TPH as motor oil was reported as present in shallow soils collected at locations T1 and T7. Additionally, TPH as motor oil has been reported as present in composite samples COMP A which is reported in the electronic data file, but not in the summary tables or analytical data presented in the Investigation Report. Under the LTCP, sampling and analysis of PAHs is required where soils are affected by either waste oil or bunker “C” fuel. At this time, sufficient technical justification has not been provided to eliminate these potential sources of COCs at the Site. As such, testing for PAHs in shallow soil is required.

**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 type="checkbox"/> Latitude and longitude of wells (GEO_XY)	<input type="checkbox"/> Depth and length of screened interval of wells (Field Point ID)
<input type="checkbox"/> Surveyed elevation of wells (GEO_Z)	<input type="checkbox"/> Boring log (GEO_BORE)
<input type="checkbox"/> Elevation of groundwater in wells (GEO_WELL)	<input type="checkbox"/> Technical report (GEO_REPORT)
<input checked="" type="checkbox"/> Site map(s) depicting location of <u>all</u> sampling points and infrastructure (GEO_MAP)	

An updated GeoMap depicting the location of all sampling points and the layout of current and historic on site structures and subsurface infrastructure has not been uploaded to GeoTracker.

**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. Subsurface Investigation Work Plan**  
**Compliance Date: August 14, 2018**

Please prepare a work plan to conduct sampling to address the data gaps identified above and in the Investigation Report. A limited scope of work was described in the Investigation Report, however, a copy of the completed CSM was not included. As such, ACDEH is unable to comment at this time regarding the adequacy of the proposed scope of work to address identified data gaps. The Subsurface Investigation Work Plan must be prepared in general accordance with the State Water Boards *Leaking Underground Fuel Tank Guidance Manual* (the LUFT Manual) and must contain the following elements:

- a. A CSM reflecting 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.

**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
GeoMap	01/26/2018	03/26/2018	08/14/2018

**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](mailto:jonathan.sanders@acgov.org).

Sincerely,



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Dilan Roe, P.E. C73703  
Chief  
Land & Water Division



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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](mailto:dilan.roe@acgov.org))
- Jonathan Sanders, ACDEH, Senior Hazardous Materials Specialist (Sent via E-mail to: [jonathan.sanders@acgov.org](mailto:jonathan.sanders@acgov.org))
- Paul King, P&D Environmental, Inc., Professional Geologist (sent via E-mail to: [pdking0000@aol.com](mailto:pdking0000@aol.com))

**ATTACHMENT A**

**LTCP Closure Criteria Evaluation Checklist**

3014 CHAPMAN STREET REDEVELOPMENT (T10000011193) - [MAP THIS SITE](#)

PUI

3030 CHAPMAN STREET - [VIEW ALTERNATE ADDRESSES](#)  
OAKLAND, CA 94601  
ALAMEDA COUNTY  
LUST CLEANUP SITE ([INFO](#))  
STATUS: OPEN - ACTIVE

**CLEANUP OVERSIGHT AGENCIES**

ALAMEDA COUNTY LOP ([LEAD](#)) - CASE #: R00003288 - [JONATHAN E. SANDERS](#)  
SAN FRANCISCO BAY RWQCB (REGION 2)

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

THIS PROJECT WAS LAST MODIFIED BY [JONATHAN E. SANDERS](#) ON 6/14/2018 12:33:35 PM - [HISTORY](#)

**CLOSURE POLICY**

*THIS VERSION IS FINAL AS OF 6/14/2018*

CHECKLIST INITIATED ON 5/10/2018

[CLOSURE POLICY HI](#)

**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
- b. The unauthorized release consists only of petroleum ([info](#)).  YES
- c. The unauthorized ("primary") release from the UST system has been stopped.  YES
- d. Free product has been removed to the maximum extent practicable ([info](#)).  FP Not Encountered  YES
- e. A conceptual site model that assesses the nature, extent, and mobility of the release has been developed ([info](#)).  YES

**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 -

YES

A utility survey has not yet been completed; COCs have not yet been fully defined (TPH-g, TPH-d, TPH-mo, TPH-bo, TPH-lo);

- f. Secondary source has been removed to the extent practicable ([info](#)).  YES
- 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
- h. Does a nuisance exist, as defined by [Water Code section 13050](#).  YES

**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](#)

**EXEMPTION - Soil Only Case (Release has not Affected Groundwater - [Info](#))**

YES

Does the site meet any of the Groundwater specific criteria scenarios?

YES

**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](#)

**EXEMPTION - Active Commercial Petroleum Fueling Facility**

YES

Does the site meet any of the Petroleum Vapor Intrusion to Indoor Air specific criteria scenarios?

YES

2a - Scenario 3 ([example](#)): Dissolved Phase Benzene Concentrations Only in Groundwater (Low concentration groundwater scenarios with or without O2 measurements must satisfy one i, ii, or iii):

**YES**

- i. For bioattenuation zone without oxygen measurements or oxygen <4% and benzene concentration are <100 µg/L, the bioattenuation zone: Is a continuous zone that provides a separation of at least 5 feet vertically between the dissolved phase benzene and the foundation of existing or potential building; and contain total TPH <100 mg/kg throughout the entire depth of the bioattenuation zone.  YES



- ii. For bioattenuation zone without oxygen measurements or oxygen <4% and benzene concentration are >100 µg/L but <1,000 µg/L, the bioattenuation zone: Is a continuous zone that provides a separation of at least 10 feet vertically between the dissolved phase benzene and the foundation of existing or potential building, and contain total TPH <100 mg/kg throughout the entire depth of the bioattenuation zone.  YES
- iii. For bioattenuation zone with oxygen ≥ 4% and benzene concentration are <1,000 µg/L, the bioattenuation zone: Is a continuous zone that provides a separation of at least 5 feet vertically between the dissolved phase benzene and the foundation of existing or potential building, and contain total TPH <100 mg/kg throughout the entire depth of the bioattenuation zone.  YES

**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](#)

**EXEMPTION - The upper 10 feet of soil is free of petroleum contamination**  YES

**Does the site meet any of the Direct Contact and Outdoor Air Exposure criteria scenarios?**  YES

**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

Has this LTCP Checklist been updated for FY 17/18?  YES

[SPELL CHECK](#)

Save Form as Partially Completed

Save Form as Complete

**ATTACHMENT B**

**Responsible Party(ies) Legal Requirements / Obligations**

<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.

**ATTACHMENT C**

**File Names for Electronic Reports**

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> April 4, 2018
	<b>PREVIOUS REVISIONS:</b>  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
	<b>ISSUE DATE:</b> June 16, 2006
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> File Names for Electronic Reports

Format: REPORT\_NAME\_R\_YYYY-MM-DD  
Ex: SWI\_R\_VOL1\_2006-05-25

<b>LOP and SCP (VRAP) INCOMING REPORTS AND LETTERS</b>	
<b>Document Name</b>	<b>Abbreviation File Name= Abbreviation + Date (yyyy- mm-dd)</b>
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	LNOWNR_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