

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

October 10, 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@mfpcorp.com)

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

**Rembert Alexander M & Jonesrembert Marie T
Trs Et Al.**
Address Unknown

**Rembert Paul Tr & Rembert Alexander & Jonesre
Et Al**
Address Unknown

Rembert Paul & Nancy Trs Et Al
Address Unknown

Rembert Nancy J Etal
Address Unknown

Gallot P E Jr Tr
Address Unknown

Gallor P E Jr & Marian L
Address Unknown

**Subject: Conditional Approval of Work Plan
Leaking Underground Storage Tank (LUST) Cleanup Site Case No. RO0003288
GeoTracker Global ID T10000011193
3014 Chapman Street Redevelopment
3030 Chapman Street, Oakland, CA 94601**

Dear Responsible Parties:

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 Work Plan (B6)* dated August 10, 2018 (the "Work Plan") prepared by P&D Environmental, Inc. on behalf of 3014 Chapman Street, LLC and submitted to ACDEH as requested in ACDEH's directive letter dated June 15, 2018.
2. *Sampling and Analysis Plan* dated August 10, 2018 (the "SAP") prepared by P&D Environmental, Inc. on behalf of 3014 Chapman Street, LLC and submitted to ACDEH as an appendix of the Work Plan as requested in ACDEH's directive letter dated June 15, 2018.
3. *Conceptual Site Model* dated August 10, 2018 (the "August 2018 CSM") prepared by P&D Environmental, Inc. on behalf of 3014 Chapman Street, LLC and submitted to ACDEH as an appendix of the Work Plan as requested in ACDEH's directive letter dated June 15, 2018.

Based on ACDEH's review of the Case file, including the above referenced documents, ACDEH hereby approves the Work Plan for implementation under the condition that the technical comments identified in **Section I** of this letter are addressed and incorporated during implementation.

Conditions of the work plan approval that must be addressed as part of the implementation of the work plan are presented in **Section I** of this letter. An LTCP criteria evaluation is provided in **Section II** and an updated LTCP

checklist is provided in **Attachment A**. 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. CONDITIONS OF WORK PLAN APPROVAL

1. Analytical Methods

Total petroleum hydrocarbons in the motor oil and bunker oil ranges (TPH-MO and TPH-BO respectively) have historically been analyzed and reported in samples collected as part of subsurface investigation activities at the Site. The Work Plan provides an explanation for the reported detections of TPH-MO and TPH-BO in soil and groundwater at the Site. Based on the explanation provided, the layout and types of infrastructure associated with the on-site underground storage tanks that was observed by ACDEH during removal activities, and ACDEH's review of the Case file, ACDEH concurs that previously reported concentrations of TPH-MO and TPH-BO are likely representative of hydrocarbons from weathered gasoline and diesel and therefore do not represent a release of bunker oil, waste oil, or motor oil. As such, ACDEH does not consider TPH-MO or TPH-BO to be constituents of concern (COCs) at the Site and therefore does not require analysis of these constituents to be included.

As a condition of approval for the implementation of the Work Plan, ACDEH requests that TPH-MO and TPH-BO analysis be excluded from the scope of work.

2. Groundwater Purging and Sampling Technique

The Work Plan includes protocols for collecting grab groundwater samples following pseudo low-flow techniques. ACDEH requires that, in accordance with guidance documents from the Department of Toxic Substances Control (DTSC)¹ and California State Water Board (the "State Water Board")², the following modifications to the purging and sampling protocols be incorporated:

- a. Turbidity be added to the list of water quality parameters monitored;
- b. Flow rates during purging and sampling must be laminar. For ¼ inch outer diameter tubing, ACDEH recommends that flow rates not exceed 500 milliliters per minute.
- c. The intake position for the pump must be located within the saturated screened interval and within the most permeable portion of the saturated water bearing zone as determined by the field geologist based on field observations.

3. Contingency for Soil Sampling

The Work Plan states that additional soil samples are not planned to be collected or submitted for analysis as part of the implementation of the Work Plan. ACDEH generally concurs with this approach because at this time further soil data is not needed to address data gaps associated with un-met LTCP Closure Criteria, however, in the event that field conditions indicative of the presence of contamination are encountered (e.g. elevated photo-ionization detector response, staining, or odor) ACDEH requires that representative samples of the potentially impacted areas be collected and analyzed in accordance with the procedures outline in the SAP and that the results of the sampling be included in the technical report to ACDEH documenting implementation of the Work Plan.

¹ *Representative Sampling of Groundwater for Hazardous Substances*, DTSC, July 1995, Revised June 2006.

² *Leaking Underground Fuel Tank Guidance Manual*, State Water Board, September 2012.

4. Data Quality Objectives

Data quality objectives (DQOs) that are presented in the SAP are not described in sufficient detail and are therefore considered incomplete. The following additional elements must be included in the DQO in order to be considered sufficient and complete:

- (1) Field quality control and quality assurance measures;
- (2) Laboratory quality control and quality assurance measures;
- (3) Sample preservation and handling measures and maximum sample hold time(s);
- (4) Data validation requirements and procedures,
- (5) Requirements for spatial and temporal bounds of data set;
- (6) Criteria for data rejection;

As a condition of approval for implementation of the Work Plan, ACDEH requires that DQOs which incorporate the missing elements identified above be included and described in the report documenting implementation of the Work Plan.

ACDEH notes that the SAP presents several sampling protocols which are incomplete or inadequate, however, these protocols are not referenced as part of the Work Plan and as such, do not require revision at this time. If the results of the implementation of the Work Plan are insufficient to close data gaps associated with site characterization, ACDEH may require revisions to the SAP prior to implementation of further work.

II. LTCP CLOSURE CRITERIA EVALUATION

Based on ACDEH’s review of the Case file, ACDEH has determined that the additional documentation provided in the Work Plan is sufficient to demonstrate that LTCP General Criteria a. has been satisfied.

As described above, ACDEH no longer considers TPH-MO or TPH-BO to be constituents of concern at the Site. As such, ACDEH concurs that, based on the current site conditions and available data, sampling for polyaromatic hydrocarbons (PAH’s) is unnecessary and the Site meets the LTCP’s Media Specific Criteria for Direct Contact and Outdoor Air Exposure at this time.

ACDEH has determined that the Case does not meet the LTCP closure criteria indicated in Table 1 below:

Table 1 – Unsatisfied LTCP Closure Criteria

General Criteria		Media Specific Criteria	
<input type="checkbox"/> a. Public Water	<input checked="" type="checkbox"/> e. CSM	<input checked="" type="checkbox"/> 1. Groundwater	
<input type="checkbox"/> b. Petroleum Only	<input type="checkbox"/> f. Secondary Source	<input type="checkbox"/> 2. Petroleum Vapor Intrusion to Indoor Air	
<input type="checkbox"/> c. Release Stopped	<input type="checkbox"/> g. MTBE	<input type="checkbox"/> 3. Direct Contact and Outdoor Air Exposure	
<input type="checkbox"/> d. Free Product	<input type="checkbox"/> h. Nuisance		

The following unsatisfied LTCP closure criteria were identified during ACDEH’s review of the case file. Excerpts from the LTCP are included in *grey italics*.

General Criteria

e. A conceptual site model (CSM) that assesses the nature, extent, and mobility of the release has been developed

“The CSM establishes the source and attributes of the unauthorized release, describes all affected media (including soil, groundwater, and soil vapor as appropriate), describes local geology, hydrogeology and other physical site characteristics that affect contaminant environmental transport and fate, and identifies all confirmed and potential contaminant receptors (including water supply wells, surface water bodies, structures and their inhabitants). ...All relevant site characteristics identified by the CSM shall be assessed and supported by data so that the nature, extent and mobility of the release have been established to determine conformance with applicable criteria in this policy.”

The CSM was updated as part of the August 2018 CSM, which identifies data gaps associated with (1) the identification of potential contaminant receptors associated with potential nearby water supply wells; (2) the identification of physical site characteristics that affect contaminant environmental transport and fate, specifically an evaluation of potential preferential pathways, has not been satisfactorily completed; (3) the extents of the groundwater contaminant plume that exceeds water quality objectives has not been defined to the north.

As discussed above, DQOs for the case had not been adequately identified which represents a data gaps relative to the establishment of the source and attributes of the unauthorized release.

In order to satisfy LTCP General Criteria e., ACDEH requires that data gaps identified above be addressed

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.”

As identified in the Work Plan and August 2018 CSM, there is currently insufficient evidence to support the determination that the contaminant plume that exceeds water quality objectives (the “Groundwater Plume”) is stable or decreasing in areal extent. The primary data gap in this determination is the lack of spatial bounds for the Groundwater Plume to the north of the Site. This data gap is also responsible for the inability to determine the maximum plume length of the Groundwater Plume. The Work Plan presents a scope of work that is intended to address these data gaps.

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

Table 2 - Summary of Groundwater Site Class Requirements and Current Site Conditions	Groundwater Site Class					Current Site Conditions ^A
	(1)	(2)	(3)	(4)	(5)	
Maximum plume Length (feet)	≤100	≤250	≤250	≤1,000	-	Unknown
Free Product not present or removed to extent practicable [REP] ^B	Not Present	Not Present	Removed to Extent Practical	Not Present	-	Not Present
Distance to nearest water supply well or surface water body (feet)	≥250	≥1,000	≥1,000	≥1,000	-	960 south-southwest (The San Francisco Bay Tidal Canal)
Benzene concentration in Groundwater (µg/L)	-	≤3,000	-	≤1,000	-	7.2
MTBE concentration in groundwater (µg/L)	-	≤1,000	-	≤1,000	-	<1.2
Land use restriction as a condition of closure	-	-	Yes	-	-	Unknown
Regulatory low threat determination	-	-	-	-	Yes	No

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

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. **Report on Site Investigation Activities** **Compliance Date: December 11, 2018**

Please submit a technical report documenting implementation of the Work Plan and conditions of approval listed in **Section I**. In addition to the reporting requirements described in the Work Plan, this technical report must also include the following elements:

- a. Copies of field data sheets and field notes
- b. A copy of the laboratory analytical report
- c. Copies of instrument calibration logs;
- d. An evaluation of utilities and potentially complete exposure pathways and receptors for the Site as requested in the June 15, 2018 Directive Letter.
- e. A statement regarding if the implementation of the Work Plan has or has not addressed any of the impediments to closure identified in **Section II** of this letter.
- f. A figure depicting the Groundwater Plume and identifying the maximum plume length or any data gaps in the spatial bounds of the groundwater analytical data set.

- g. A copy of the CSM that has been updated with the findings of the investigation and identifying any remaining data gaps or other impediments to closure under the LTCP;

IV. 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)546-6791 or by email at jonathan.sanders@acgov.org.

Sincerely,



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



Jonathan Sanders
Senior Hazardous Materials Specialist
Local Oversight and Site Cleanup Program

ENCLOSURES:

- Attachment A LTCP Closure Criteria Evaluation Checklist
Attachment B Responsible Party(ies) Legal Requirements / Obligations
Attachment C File Names for Electronic Reports

DISTRIBUTION LIST:

Electronic File, GeoTracker

Dilan Roe, ACDEH, Chief Land, Water Division (Sent via E-mail to: dilan.roe@acgov.org)

Jonathan Sanders, ACDEH, Senior Hazardous Materials Specialist (Sent via E-mail to: jonathan.sanders@acgov.org)

Paul King, P&D Environmental Inc. (sent via E-mail to: Paul.King@pdenviro.com)

ATTACHMENT A

LTCP Closure Criteria Evaluation Checklist

3014 CHAPMAN STREET REDEVELOPMENT (T1000011193) - [MAP THIS SITE](#)

PUBLIC PAGE

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

CLEANUP OVERSIGHT AGENCIES
ALAMEDA COUNTY LOP (**LEAD**) - CASE #: RO0003288 - [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 10/11/2018 12:40:26 PM - [HISTORY](#)

CLOSURE POLICY *THIS VERSION IS FINAL AS OF 10/11/2018* CHECKLIST INITIATED ON 5/10/2018 [CLOSURE POLICY HISTORY](#)

General Criteria - *The site satisfies the policy general criteria* - [CLEAR SECTION ANSWERS](#) **NO**

- a. Is the unauthorized release located within the service area of a public water system?
 Name of Water System :
 YES NO
- b. The unauthorized release consists only of petroleum ([info](#)). YES NO
- c. The unauthorized ("primary") release from the UST system has been stopped. YES NO
- d. Free product has been removed to the maximum extent practicable ([info](#)). FP Not Encountered YES NO
- e. A conceptual site model that assesses the nature, extent, and mobility of the release has been developed ([info](#)).
 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 YES NO
 Soil Assessment Incomplete - Areal Extent Not Defined
 Soil Assessment Incomplete - Depth Unknown
 Soil Vapor Not Evaluated
 Other -
- f. Secondary source has been removed to the extent practicable ([info](#)). YES NO
- g. Soil or groundwater has been tested for MTBE and results reported in accordance with Health and Safety Code Section 25296.15. Not Required YES NO
- h. Does a nuisance exist, as defined by [Water Code section 13050](#). YES NO

1. Media-Specific Criteria: Groundwater - *The contaminant plume that exceeds water quality objectives is stable or decreasing in areal extent, and meets all of the additional characteristics of one of the five classes of sites listed below.* - [CLEAR SECTION ANSWERS](#) **NO**

EXEMPTION - Soil Only Case (Release has not Affected Groundwater - [info](#)) YES NO

Does the site meet any of the Groundwater specific criteria scenarios? YES NO

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

- Plume Length (That Exceeds Water Quality Objectives) :**
 ≥ 100 Feet and < 250 Feet ≥ 250 Feet and < 1,000 Feet ≥ 1,000 Feet Unknown
- Plume is Stable or Decreasing in AREAL Extent :**
 No Unknown
- Free Product in Groundwater :**
 Yes No Unknown
- Free Product Has Been Removed to the Maximum Extent Practicable :**
 No Unknown
- For sites with free product, the Plume Has Been Stable or Decreasing for 5-Years (info) :**
 No Unknown
- For sites with free product, owner Willing to Accept a Land Use Restriction (if required) :**
 No Unknown
- Free Product Extends Offsite :**
 Yes Unknown
- Benzene Concentration :**
 ≥ 1,000 µg/l and < 3,000 µg/l ≥ 3,000 µg/l Unknown
- MTBE Concentration :**
 ≥ 1,000 µg/l Unknown
- Nearest Supply Well (From Plume Boundary) :**
 ≤ 250 Feet > 250 Feet and ≤ 1,000 Feet Unknown
- Nearest Surface Water Body (From Plume Boundary) :**
 ≤ 250 Feet > 250 Feet and ≤ 1,000 Feet Unknown

2. Media Specific Criteria: Petroleum Vapor Intrusion to Indoor Air - *The site is considered low-threat for the vapor-intrusion-to-air pathway if site-specific conditions satisfy items 2a, 2b, or 2c - [CLEAR SECTION ANSWERS](#)*

YES

EXEMPTION - Active Commercial Petroleum Fueling Facility

YES NO

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

YES NO

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 NO

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 NO

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 NO

3. Media Specific Criteria: Direct Contact and Outdoor Air Exposure - *The site is considered low-threat for direct contact and outdoor air exposure if it meets 1, 2, or 3 below. - [CLEAR SECTION ANSWERS](#)*

YES

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

YES NO

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

YES NO

3(a) - Maximum concentrations of petroleum constituents in soil are less than or equal to those listed in the following table ([LINK](#)), for the specified depth below ground surface.

YES NO

Additional Information

Should this case be closed in spite of NOT meeting policy criteria?

YES NO

Has this LTCP Checklist been updated for FY 18/19?

YES NO

[SPELL CHECK](#)

Save Form as Partially Completed

Save Form as Complete

ATTACHMENT B

Responsible Party(ies) Legal Requirements / Obligations

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

ATTACHMENT C

File Names for Electronic Reports

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: April 4, 2018
	PREVIOUS REVISIONS: April 4, 2018, July 17, 2017, November 8, 2016, December 15, 2015, December 16, 2014, June 19, 2013, June 15, 2011, March 26, 2009, April 29, 2008
	ISSUE DATE: June 16, 2006
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: File Names for Electronic Reports

Format: REPORT_NAME_R_YYYY-MM-DD
Ex: SWI_R_VOL1_2006-05-25

LOP and SCP (VRAP) INCOMING REPORTS AND LETTERS	
Document Name	Abbreviation File Name= Abbreviation + Date (yyyy- mm-dd)
Abandoned Well Information/Water Supply Well Information	ABWELLINF_R
Addendum	ADEND_R (added after report name)
Additional Information Report	ADD_R
Analytical Reports (Loose data sheets not in report)	ANALYT_R
As Built Drawings (or Plans)	AS_BUILT
Case File Scanned By OFD	CASE_FILE
Cleanup and Abatement Report	CAO_R
Case Transfer Form (from CUPA)	CASE_TRNSFR_F
Conduit Study/Well Search/Sensitive Receptor/Well Survey/Preferential Pathway Study	COND_WELL_R
Corrective Action Plan (CAP)	CAP_R
Correspondence	CORRES_L
Court Injunctions	INJ_L
Development Entitlement	DEV_ENTITLE
Development Plans (Includes Plan Set, Cross-sections, and Related Drawings)	DEV_PLAN
Development Schedule (Project Schedule, Gant Chart, etc.)	DEV_SCHD
DWR Confidential Well Logs (Report containing)	report name_R_CONFIDENTIAL_YYYY-MM-DD (Ex: SWI_R_CONFIDENTIAL_YYYY-MM-DD)
DWR Well Completion Report-Confidential (Loose well logs)	DWR_WELL_CONFIDENTIAL_YYYY-MM-DD (Date of Well Log)
ESI/DAR (Environmental Site Investigation, Data Assessment Report)	ESI_R
Excavation Report	EX_R
Extension Request Letter	EXT_RQ_L

Fact Sheet	FACT_SHT
Feasibility Study	FEASSTUD_R
Groundwater Monitoring/Quarterly Summary Report	GWM_R
Financial Assurance/Letter of Credit	FNCL_ASSRNC_LOC
Interim Remedial Action Plan	IRAP_R
Interim Remediation Results (Includes Pilot Test Reports, Vapor Mitigation Reports, Soil Management Reports, Free Product Removal Reports, & Dual-Phase Extraction Reports)	IR_R
Lawsuit	LAWSUIT_R
Migration Control Report	MIG_R
Miscellaneous Report/Soil Sample	MISC_R
Miscellaneous Sample Report (analytical results)	MISC_SAMP_R
Notification Letter	NOT_L
NPDES Miscellaneous Reports	NPDES_R
Operations & Maintenance Plan	OM_P
Operations & Maintenance Report	OM_R
Pay for Performance	PFP_R
Petition	PETITION_R
Phase 1 Environmental Assessment Report	PHASE1_R
Photos	PHOTO
Preliminary Site Assessment Report/Phase 2 (historic reports only)	PSA_R
Remedial Action Plan	RAP_R
Remedial Design & Implementation Plan	RDIP_R
Remediation Progress Report	REM_R
Request for Closure	RFC(_L or _R)
Risk Assessment Report	RISK_R
Risk Based Corrective Action	RBCA_R
List of Landowners Forms	LNDOWNR_F
SB2004 Letter of Commitment	LOC_L
Site Conceptual Model/Conceptual Site Model	SCM_R
Site Health & Safety Plan	SFTY_PLAN_R
Site Management	SITE_MANAGE_R_
Acknowledgement Statement for Site Management Plan	SMP_ACK_L
Site Management Plan	SMP_R
Site Summary Report	SITE_SUM_R

Soil and Water Investigation Report (Includes soil gas/vapor reports, indoor, additional site investigation, well installation, site characterization, cross section, indoor air, additional onsite investigation, Phase II/preliminary site assessment)	SWI_R
Soil Disposal Report	SOIL_DSPL_R
Source Area Characterization	SOURCAREA_R
State Information	STATE_INFO (no date)
Status Report(monthly remediation status reports addressed to sanitary district requires no stamp/perjury letter)	STAT_R
Tank/Tank System Removal Report	TNK_R
Tentative Order Report	TENT_R
Unauthorized Release Form	URF_R
UST Sampling Report	UST_SAMP_R
USTCF 5 Year Review	USTCF_5YR
USTCF issued Public Notice	USTCF_PP_L
Well Construction Report (limited to water supply wells)	WELL_CST_R
Well Decommissioning Report/Letter (well destruction/abandonment)	WELL_DCM_R
Work Plan	WP_R