

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
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

December 28, 2017

Union Oil of California/ Chevron Corporation
DBA Chevron Environmental Management Company
6101 Bollinger Canyon Road, C2102
San Ramon, California 94583
Attention: James Kiernan (*Sent via electronic mail to: jkiernan@chevron.com*)

Ibrahim & Narwal Abbushi
16736 Kildare Road
San Leandro, CA 94578-1267

Tony Bahn & Monument Gas & Mart
10151 International Blvd.
Oakland, CA 94603

Monument Gas & Mart
111 East 14th St.
San Leandro, CA 94578

TOSCO Operation Company Inc.
(C/o Real Est. Dept. DC56)
PO Box 52085
Phoenix, AZ 85072

TOSCO
(C/o David DeWitt)
Address Unknown

Clover Trust 1997-1
(C/o TOSCO Corp.)
PO Box 52085
Phoenix, AZ 85072

Union Oil Company of California
(C/o Tax Division)
PO Box 7600
Los Angeles, CA 90051

Phillips 66 Company
76 Broadway
Sacramento, CA 95818

Attention: Ed Ralston (*Sent via electronic mail to: Ed.C.Ralston@p66.com*)

Subject: Electronic Submittal of Information, Fuel Leak Case No. RO0002444 and GeoTracker Global ID T0600173591, Unocal #7124, 10151 International Blvd., Oakland, CA 94603

Dear Responsible Parties:

As you are aware, Alameda County Department of Environmental Health (ACDEH) is considering the above referenced site for potential case closure. In our letter dated June 23, 2017 you were informed the case is not in compliance with California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3890 to 3895 with regard to submittals to the State Water Resources Control Board's (SWRCBs) GeoTracker database.

A review of the case file indicates that GeoTracker database remains incomplete, thus the site continues to be in a non-compliant status. At present missing data and documents include, but may not be limited to:

- GEO_MAP (April 7, 2017 event) - Please submit report Figure 3 as the associated GEO_MAP;
- GEO_REPORT (October 18, 2017 event) - Please submit the groundwater monitoring report for the October 18, 2017 monitoring event.

Additional data may be available that ACDEH is not aware of, or may not have been submitted, and therefore has not been incorporated in to ACDEH's review. If additional data is made available, the data can be incorporated in our Low Threat Underground Storage Tank Case Closure Policy (LTCP) closure review. In order to regain compliance status, ACDEH requests that you review the GeoTracker database

and upload the documents determined to be missing from GeoTracker. Please complete the review and submittals by the date specified below. Please provide ACDEH with a list of GeoTracker submittals associated with this request via electronic mail, Attention: Keith Nowell.

TECHNICAL REPORT REQUEST

Please upload technical reports to the SWRCBs GeoTracker website, in accordance with the following schedule:

- **January 19, 2018** – Electronic Deliverables
- **January 19, 2018** – Listing of Electronic Deliverables (provided via electronic mail to ACDEH, Attention: Keith Nowell)

Please note that, as of January 1, 2018, document submittals to the ACDEH FTP site are no longer required.

Should you have any questions, please contact me at (510) 567- 6764 or send me an electronic mail message at keith.nowell@acgov.org.

If your email address does not appear on the cover page of this notification, ACDEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Sincerely,

Keith Nowell, PG, CHG
Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements/Obligations

cc: Samuel Miles, 1100 Olive Way, Suite 800, Seattle, Washington 98101 (*Sent via electronic mail to Samuel.Miles@arcadis.com*)

Katherine Brandt, ARCADIS U.S., Inc., 2000 Powell St., 7th Floor, Emeryville, CA 94608 (*Sent via electronic mail to: Katherine.Brandt@arcadis-us.com*)

Dilan Roe, ACDEH, (*Sent via electronic mail to dilan.roe@acgov.org*)

Paresh Khatri, ACDEH (*Sent via electronic mail to paresh.khatri@acgov.org*)

Keith Nowell, ACDEH, (*Sent via electronic mail to keith.nowell@acgov.org*)

Geotracker, Electronic File

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"/>				
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.