



March 8, 2018

Mr. Mo Mashhoon
Mash Petroleum, Inc.
428 13th Street, Floor 10
Oakland, CA 94588
(Sent via electronic mail to
momashhoon@mashpetroleum.com)

Subject: Meeting Followup and Initiation of Rebound Testing; Site Cleanup Program Case No. RO0003258 and Geotracker Global ID T10000010738, A+A Gas & Mart, 2200 Telegraph Avenue, Oakland, CA 94612

Dear Mr. Mashhoon:

Thank you for meeting with Alameda County Department of Environmental Health (ACDEH) staff in our office on March 6, 2018, to discuss the subject site. The meeting was requested by all stake holders to review site data and determine a path forward for the redevelopment of the site.

Data presented in the meeting documented the continuation of pilot testing past the ACDEH approved 30 day period, and the lack of subsequent rebound testing as discussed in the August 23, 2017 directive letter.

Based on discussions at the meeting, we request that you address the following technical comments and send us the reports described below.

TECHNICAL COMMENTS

- 1. Initiate Rebound Testing** – In accordance with the discussion in the meeting, ACDEH requests that Dual Phase Extraction (DPE) be terminated immediately. ACDEH will provide directives for rebound monitoring upon submittal and review of a report documenting the recent soil, groundwater and soil vapor sampling and pilot test conducted at the site.
- 2. GeoTracker Compliance** – A review of the State Water Resources Control Board's (State Water Board) GeoTracker database indicates the site has not been claimed and no reports and data analytical data have been uploaded to the case file. Because this is a state requirement, ACDEH requests that the site be claimed in GeoTracker by the date identified below. Therefore, please claim your site and upload all requisite documents and data to GeoTracker by the date specified below. Please reference Attachment A for information on electronic reporting requirements and Responsible Party (ies) Legal Requirements/Obligations.

Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30 electronic copies of all site related documents must be transmitted electronically (in PDF format) to the State Water Board GeoTracker data base via the internet. Additionally all water level measurements and analytical data including soil, soil vapor, groundwater, surface water, indoor air, and ambient air samples, must be uploaded in electronic deliverable format (EDF). Also, all permanent monitoring points utilized to collect soil vapor and groundwater samples (i.e. monitoring wells) must be surveyed (top of casing) by a California licensed surveyor to mean sea level and latitude and longitude to sub-meter accuracy using NAD 83. California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 389 and 3894. Additional information regarding the SWRCB's GeoTracker website may be obtained online at http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/ and http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml) or by contacting the GeoTracker Help Desk at geotracker@waterboards.ca.gov or (866) 480-1028.

3. **Gantt Chart Generation** –ACDEH requests the generation of a Gantt Chart detailing the timeline and sequencing of the environmental investigation and cleanup activities, station demolition and site redevelopment. Initial dates for critical path items were identified in the meeting and include the following:

- **March 20, 2018** – Site Investigation and Pilot test Report Submittal to ACDEH and Geotracker
- **April 20, 2018** – ACDEH Response and Comments
- **April 30, 2018** – Stakeholder Meeting at ACDEH, 10 – 12 A.M.
- **May 20, 2018** – Submittal of Corrective Action Plan (CAP)
- **June 13, 2018** – Review Meeting at ACDEH 10 – 12 A.M.
- **June 20, 2018** – Start of Public Participation
- **July 20, 2018** – End of Public Participation
- **July 31, 2018** – Stakeholder Meeting at ACDEH 10 – 12 A.M.
- **August 20, 2018** – Submittal of Corrective Action Implementation Plan (CAIP)
- **September 12, 2018** – Stakeholder Meeting at ACDEH 10 – 12 A.M.
- **September 20, 2018** – ACDEH Comments / Approval
- **October 1, 2018** – Station Demolition, Corrective Actions (underground storage tank and lead contaminated soil removal, with other identified actions)
- **December 2018** – Property transaction complete

TECHNICAL REPORT REQUEST

Please submit the following technical reports and deliverables to the State Water Board Geotracker website, in accordance with the following specified file naming convention and schedule as provided below and in the Responsible Party (ies) Legal Requirements/Obligations which is included as Attachment 1. Please notify your case worker of completion of each task.

- **March 20, 2018** - Site Investigation and Pilot Test Report
File to be named RO3258_DRAFT_CAP_R_YYYY-MM-DD
- **March 30, 2018** – Geotracker Compliance
- **April 20, 2018** – Gantt Chart

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

If you have any questions, please do not hesitate to call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,



Mark E. Detterman, PG 4799, CEG 1788
Senior Geologist; Senior Hazardous Materials Specialist

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

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cc: Mansour Sepehr, SOMA Environmental Engineering, 6620 Owens Dr., Suite A, Pleasanton, CA 94588; (Sent via electronic mail to: msepehr@somaenv.com)

Denise Pinkston, BA1 2201 Valley LLC; c/o TMG Partners; 100 Bush Street, Suite 2600, San Francisco, CA 94104; (Sent via electronic mail to: dpinkston@tmgpartners.com)

William Mast, PES Environmental, Inc, 7665 Redwood Blvd, Suite 200, Novato, CA 94954; (Sent via electronic mail to: wmast@pesenv.com)

Rob Crepes, PES Environmental, Inc, 7665 Redwood Blvd, Suite 200, Novato, CA 94954; (Sent via electronic mail to: rcrepes@pesenv.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)

Mark Detterman, ACDEH, (Sent via electronic mail to: mark.detterman@acgov.org)

Electronic File; GeoTracker

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.