

ALAMEDA COUNTY  
**HEALTH CARE SERVICES  
AGENCY**

COLLEEN CHAWLA, Director



DEPARTMENT OF ENVIRONMENTAL HEALTH  
LOCAL OVERSIGHT PROGRAM (LOP)  
FOR HAZARDOUS MATERIALS RELEASES  
1131 HARBOR BAY PARKWAY  
ALAMEDA, CA 94502  
(510) 567-6777  
FAX (510) 337-9135

July 20, 2018

Mr. Mo Mashhoon  
Mash Petroleum, Inc.  
428 13<sup>th</sup> Street, Floor 10  
Oakland, CA 94588

(Sent via electronic mail to:

[momashhoon@mashpetroleum.com](mailto:momashhoon@mashpetroleum.com))

Mr. David Cropper  
BA1 2201 Valley LLC  
c/o TMG Partners  
100 Bush Street, Suite 2600  
San Francisco, CA 94104

(Sent via electronic mail to: [dcropper@tmgpartners.com](mailto:dcropper@tmgpartners.com))

Subject: Approval of *Focused Site Conceptual Model and Workplan for Well Installation and MPE Operation*, Site Cleanup Program Case No. RO0003258 and Geotracker Global ID T10000010738, A+A Gas & Mart, 2200 Telegraph Avenue and 2201 Valley Street, Oakland, CA 94612

Dear Messrs. Mashhoon and Cropper:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file including the *Focused Site Conceptual Model and Workplan for Well Installation and MPE Operation*, dated September 26, 2018, by SOMA Environmental Engineering, Inc. (SOMA) for work proposed at 2200 Telegraph Avenue and at 2201 Valley Street, in Oakland California. Thank you for submitting the report.

The SCM reported on the results of the installation of DPT-9 to DPT-18 in July to August 2018 and identified the upper water-bearing zone at the site as a perched seasonal (ephemeral) water-bearing zone. The work plan proposed the installation of two new extraction wells screened across the perched upper zone and the deeper water-bearing zone on the parcel for 2201 Valley Street. The extraction wells will be used for Multi-Phase Extraction (MPE), and proposed MPE operations for an estimated four to five weeks, and that two rounds of rebound testing will be conducted thereafter.

ACDEH notes that residual soil contamination currently remains in place and may continue to act as a source for groundwater contamination on both parcels without further actions. The report indicates that a work plan for the delineation of essentially surficial lead is forthcoming.

Based on ACDEH staff review of the above referenced documents and of the case file we generally concur with the recently proposed scope of work, provided that you address the following technical comments, submit the requested documents, and upon ACDEH approval, perform the proposed work, and send us the technical reports requested below. Please provide 72-hour advance written notification to this office (e-mail preferred to: [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org)) prior to the start of field activities.

### **TECHNICAL COMMENTS**

- 1. Work Plan Approval** – The referenced SOMA revised work plan proposes a series of actions with which ACDEH is in general agreement of undertaking. Please submit a report by the date specified below.

### **TECHNICAL REPORTS/WORK SCHEDULE**

Please submit the following deliverables to ACDEH 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 Attachment 1. ACDEH requests email notification verifying the requested deliverables have been uploaded to Geotracker (e-mail preferred to: [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org)).

Messrs. Mashhoon and Cropper

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- **Remedial Progress Report** – To be Determined  
File to be named: RO3258\_REM\_R\_yyyy-mm-dd
- **GeoTracker Database Compliance** – ongoing as investigation and reports are conducted

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](mailto: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

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

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

Rob Creps, PES Environmental, Inc, 7665 Redwood Blvd, Suite 200, Novato, CA 94954; (Sent via electronic mail to: [rcreps@pesenv.com](mailto:rcreps@pesenv.com))

Dilan Roe, ACDEH, (Sent via electronic mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))

Paresh Khatri, ACDEH; (Sent via electronic mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org))

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

Electronic File; GeoTracker

<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"/>				
<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.