



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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December 11, 2015

Ms. Carryl MacLeod
Chevron Environmental
Management Company
6001 Bollinger Canyon Road
San Ramon, CA 94583
(sent via electronic mail to:
CMacleod@chevron.com)

Mr. Onsori Ardavan
37 Victoria Drive
Atherton, CA 94027-4122
(sent via electronic mail to:
dmbasmatirice@yahoo.com)

Frances & Louis Carnazzo
Carnazzo Land Co, Inc, et al.
P.O. Box 6031
Atascadero, CA 93423-6031

Ahmad & Shahla Mostofi
37 Victoria Drive
Atherton, CA 94027-4122

Subject: Conditional Approval of Pilot Test Work Plan and Request for Water Supply Well Installation Schedule; Fuel Leak Case No. RO0000185 (Global ID #T0600102298), Chevron #9-7127, I 580 and Grant Line Road, Tracy, CA

Dear Ladies and Gentlemen:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including the *Semi-Annual Groundwater Monitoring Report, Third Quarter 2015*, and the *Pilot Test Work Plan*, both dated October 29, 2015. The reports were prepared and submitted on your behalf by Stantec Consulting Services, Inc (Stantec).

Based on ACEH staff review of the work plan, the proposed scope of work is approved for implementation provided that the technical comments below are incorporated during the proposed work. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- 1) **Work Plan Modifications** – The referenced work plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests several modifications to the approach. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. Please submit the results of the pilot tests in a site investigation report or Corrective Action Plan Addendum by the date specified below.
 - a) **Sufficient Observation Wells** – The referenced pilot test report states that wells MW-9, MW-10, MW-11, and MW-15 will be used as observation wells for the proposed Dual Phase Extraction and / or Air Sparging / Soil Vapor Extraction Tests proposed for the site. Each of these wells is a minimum of 40 feet from well MW-1, and may be too distant from MW-1 to effectively determine the radius of influence for the proposed tests. To expedite selection of corrective actions at the site, it is appropriate to install additional observation wells closer to well MW-1 prior or concurrent with conducting the pilot tests. Please submit a brief letter contingency work plan (revised Figure

2 with well locations, including the proposed air sparge well location), with standard well installation protocols by the date identified below, concurrent with project initiation.

- 2) **Water Supply Well Installation Schedule** – As discussed in the August 5, 2015 meeting and further requested in an email dated October 13, 2015, redevelopment proponents committed to scheduling the installation of a water supply well at the site, and communicating the schedule to all stakeholders. No further communications have been received by ACEH. As noted in the meeting, the lack of a viable water supply will necessarily preclude site redevelopment. Please communicate the well installation schedule by the date referenced below.
- 3) **Proposed Groundwater Sampling Interval Changes** – The referenced groundwater monitoring report proposed a groundwater sampling interval change from a quarterly groundwater sampling and monitoring interval to a semi-annual sampling and monitoring interval during the first and third quarters of a year. ACEH is in general agreement with the proposed change; sufficient data has been generated over a number of years at the site. This is subject to reevaluation based on data requirements of future corrective, or other, actions at the site.
- 4) **Groundwater Analytical Suite** – ACEH was not able to locate previously proposed groundwater Halogenated Volatile Organic Compound (HVOC) and Semi-Volatile Organic Compound (SVOC) analytical data for the site. The former presence of a waste oil underground storage tank (UST) indicates that HVOC and SVOC analysis is appropriate in the vicinity and downgradient of the former waste oil UST (MW-3, MW-12, and MW-13). If the data has previously been collected, please bring it forward into current groundwater tables. If it has not been previously collected, please collect the data during the next groundwater sampling event.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with Attachment 1 and the specified file naming convention below, according to the following schedule:

- **January 8, 2016 – Water Supply Well Installation Schedule**
- **January 11, 2016 - Field Implementation of Work Plan**
- **January 11, 2016 – Contingency Work Plan (Observation Wells)**
File to be named: RO185_WP_R_yyyy-mm-dd
- **March 4, 2016 - Completion of Pilot Test**
- **March 18, 2016 - Variance for Septic Notification**
- **April 15, 2016 - Submittal of CAP Addendum (Limited and Simple); with Well Destruction Schedule;** File to be named: RO185_CAP_ADEND_R_yyyy-mm-dd
- **April 29, 2016 - Stakeholder Meeting**
- **May 16, 2016 - Start of 30-Day Public Participation Period**
- **May 13, 2016 – First 2016 Semi-Annual Groundwater Monitoring and Sampling**
File to be named: RO185_GWM_R_yyyy-mm-dd
- **June 27, 2016 - End of 30-Day Public Participation Period**
- **August 29, 2016 - CAP Implementation Plan (With System Design); Schedule Drillers**
File to be named: RO185_CAIP_R_yyyy-mm-dd
- **October 31, 2016 - System Well Installation**
- **November 4, 2016 – Second 2016 Semi-Annual Groundwater Monitoring and Sampling**
File to be named: RO185_GWM_R_yyyy-mm-dd

Ladies and Gentlemen
RO0000185
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These reports are being requested 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 in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

If your email address is not listed on the first page of this letter, ACEH is requesting your email address to help expedite communications and to help lower overall costs. Please provide that information in the next submittal.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

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

cc: Brian Westhoff, Stantec, Inc, 3017 Kilgore Road, Suite 100, Rancho Cordova, CA 95670
(sent via electronic mail to brian.westhoff@stantec.com)

Vera Fischer, Central Valley Regional Water Quality Control Board, 11020 Sun Center Drive
#200, Rancho Cordova, CA 95670-6114, (sent via electronic mail to:
vera.fischer@waterboards.ca.gov)

Dilan Roe, ACEH, (sent via electronic mail to dilan.roe@acgov.org)
Mark Detterman, ACEH, (sent via electronic mail to mark.detterman@acgov.org)
Geotracker, Electronic File

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

These reports are being requested 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 in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) GeoTracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) 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 registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional 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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- **Signature pages and perjury statements must be included and have either original or electronic signature.**
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Submission Instructions

- 1) Obtain User Name and Password
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to deh.loptoxic@acgov.org
 - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses**, and the **Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to deh.loptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.