

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
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May 21, 2018

Responsible Parties (RPs) for Leaking Underground Storage Tank (LUST) Cleanup Site No. RO0000484 and GeoTracker Global ID No. T0600100985

Bo Gin
342 Lester Avenue
Oakland, CA 94606

RPs for LUST Cleanup Site No. RO0000321 and GeoTracker Global ID No. T0600102122

Peter Yee
1000 San Antonio Avenue
Alameda CA, 94501

Kin Chan
4328 Edgewood Avenue
Oakland CA, 94602

RPs for LUST Cleanup Site No RO0000231 and GeoTracker Global ID No. T0600101486

Chevron Environmental Management Company
c/o James Kiernan
6101 Bollinger Canyon Road, Suite 5213
San Ramon CA, 94583
(sent via email to: kiernan@chevron.com)

Phillips 66 Company
c/o Ed Ralston
76 Broadway
Sacramento CA, 95818
(Sent via E-mail to: ed.c.ralston@p66.com)

Muhammad Usman
800 Harrison Street
Oakland CA, 94607

Armsco, Inc
c/o Mahmood M Ali
P.O. Box 5427
Novato, CA 94948

**Subject: Notification of Change in Primary Caseworker & Remediation System Startup Authorization Comingled Plume Case No. 0068
LUST Case Nos. RO0000231, RO0000321, & RO0000484
GeoTracker Global IDs T0600101486, T0600102122, & T0600100985**

Dear Responsible Parties:

I would like to take this opportunity to introduce myself as the new primary caseworker for Alameda County Department of Environmental Health (ACDEH) for the above referenced Comingled Plume Case (the Site). ACDEH has reviewed the case files associated with the above referenced Comingled Plume Case, including the email correspondence to ACDEH from Arcadis on behalf of the Chevron Environmental Management Company (CEMC) dated May 14, 2018 (the "Startup Authorization Request") requesting a directive letter to authorize startup of the remediation system and initiation of semi-annual progress reports to document system performance.

The Comingled Plume Case is associated with Fuel Leak Case Number RO0000231 (Unocal #0752) located at 800 Harrison, Fuel Leak Case Number RO0000321 (Chan's Service Station / Shell) located at 726 Harrison, and Fuel Leak Case Number RO0000484 (Oakland Auto Parts) located at 706 Harrison in the City of Oakland, California. The remediation system is a combination soil vapor extraction (SVE) and air sparge (AS) system that was originally proposed by Arcadis U.S. Inc (Arcadis) in a *Remedial Action Plan* dated April 18, 2014 (the "RAP") which was prepared on behalf of CEMC affiliate, Union Oil Company of California. Installation details were subsequently modified in Arcadis' *Remedial Action Plan Addendum* dated July 1, 2014 (the "First RAP Addendum") and Arcadis' *Second Remedial Action Plan Addendum* dated December 2, 2016 (the "Second RAP Addendum"). Further modifications to the remediation system were discussed and approved during phone conversations between the Responsible Parties, Alameda County Department of Environmental Health (ACDEH) and the California Water Resources Control Board (Water Board).

ACDEH hereby authorizes startup and operation of the remediation system associated with the Comingled Plume Case. ACDEH's request for deliverables associated with the installation of the remediation system and the operation, maintenance, and monitoring of the remediation system operations are requested in **Section I** below.

I. DELIVERABLE AND TECHNICAL REPORT REQUEST

Please submit the following technical reports and deliverables to ACDEH (Attention: Jonathan Sanders) in accordance with the compliance schedule provided below and the *Responsible Party(ies) Legal Requirements/Obligations* and the *File Names for Electronic Reports* which are included as **Attachments A and B** respectively. These technical reports are being requested pursuant to Section 13267 of the California Water Code.

1. Remediation System Record Report of Construction and Startup Report Due July 31, 2018

Please prepare and submit a Remediation System Record Report of Construction and Startup report by the compliance date listed above. This report should be prepared in accordance with the reporting requirements described in the RAP, Arcadis' *Remediation Performance Evaluation and Monitoring Plan* dated February 10, 2015 and ACDEH's subsequent conditions of approval provided in ACDEH's *Directive Letter* dated March 11, 2015. At a minimum, the Remediation System Record Report of Construction and Startup Report must contain the following elements:

1. Record drawings for the SVE/AS system construction.
2. A process flow diagram for any programmable logic controllers;
3. A site plan depicting the location and layout of SVE and AS remediation system components (e.g., conveyance piping, extraction and injection well locations, emission location) and other relevant site features;
4. Documentation that the system was installed in accordance with the remediation system design;
5. A performance and system optimization evaluation. This evaluation must include operational data and calculation of the effective treatment radius, influent and effluent flow rates and concentrations, and calculation of emission rates for contaminant of concern; and
6. A permit compliance evaluation.

2. Remediation Status Report, 3rd Quarter of 2018 Due October 30, 2018

Please submit a remediation status report summarizing remediation system operations, maintenance, and monitoring activities and groundwater monitoring activities conducted during the 3rd quarter of 2018 by the compliance date listed above.

**Notification of Change in Primary Caseworker & Remediation System Startup Authorization
Unocal #0752, Chan's Service Station, and Oakland Auto Parts**

May 21, 2018

II. 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)567-6791 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 Responsible Party(ies) Legal Requirements / Obligations
- Attachment B 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)

Katherine Brandt, Arcadis, Project Manager (Sent via E-mail to: katherine.brandt@arcadis-us.com)

Casey Satkowski, Water Board, Engineering Geologist (Sent via E-mail to: casey.satkowski@waterboards.ca.gov)

ATTACHMENT A

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"/>				
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 B

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
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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 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)	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