

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**

AGENCY

REBECCA GEBHART, Acting Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

May 18, 2016

Chevron Environmental  
Management Company  
6101 Bollinger Canyon Road  
San Ramon, CA 94583  
Attn.: James Kiernan  
(Sent via electronic mail to:  
[jkiernan@chevron.com](mailto:jkiernan@chevron.com))

Phillips 66 Company  
76 Broadway  
Sacramento, CA 95818  
Attn: Ed Ralston  
(Sent via electronic mail to:  
[Ed.C.Ralston@p66.com](mailto:Ed.C.Ralston@p66.com))

Ramesh Sood Family Trust  
7183 Fawn Hills Lane  
Pleasanton, CA 94566  
Attn: Ramesh and Promila Sood

Scarteen Corp.  
PO Box 7600  
Los Angeles, CA 94580

Subject: Fuel Leak Case No. RO0000344 and Geotracker Global ID T0600101469, Unocal #5760,  
376 Lewelling, San Lorenzo, CA 94621

Dear Responsible Parties:

Thank you for the recent submittal, dated May 18, 2016, informing Alameda County Environmental Health (ACEH) of the change of Project Manager for Chevron Environmental Management Company (CEMC). The notification included an update for the consultant contact information. Our records have been updated to reflect these changes.

The subject case has been identified as eligible for closure. An incomplete well destruction report was uploaded to the ACEH ftp site and California State Water Resources Control Board (SWRCB) GeoTracker database on April 7, 2015. In a correspondence to ACEH dated July 23, 2015, the consultant inquired if the waste disposal documentation was required to meet the Closure requirements. ACEH replied on July 23, 2015 that the disposal documentation should be included as an attachment to the report and the report should include the language that all remaining investigation, remediation, and well destruction derived wastes have been removed from the site.

A copy of the SWRCB Fact Sheet regarding waste removal requirements is included as an attachment. Additionally, ACEH requested the revised Well Destruction Report be uploaded to the ACEH ftp and GeoTracker websites. Upload instructions are included as an attachment. A copy of the ACEH correspondence is included as an attachment.

The submittal of the revised Well Destruction Report has not been received by either the ftp or GeoTracker sites. The submittal and acceptance of the revised Well Destruction Report is the only impediment to closure.

**TECHNICAL REPORT REQUEST**

Responsible Parties  
RO0000344  
May 18, 2016, Page 2

Please upload technical reports to the ACEH ftp site (Attention: Keith Nowell), and to the SWRCB's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **June 17, 2016** – Revised Well Destruction Report (File to be named: WELL\_DCM\_R\_yyyy-mm-dd)

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.

Thank you for your cooperation. ACEH looks forward to working with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org).

Sincerely,

Keith Nowell, PG, CHG.  
Hazardous Materials Specialist

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

Attachment 2 – California State Water Resources Control Board Fact Sheet – Well Destruction and Waste Removal Requirements Prior to Underground Storage Tank Case Closure.

Attachment 3 – Alameda County Environmental Health Correspondence dated July 23, 2015

cc: Sean Coyle, Stantec Consulting Services Inc., 3875 Atherton Road, Rocklin, CA 94597 (*Sent via E-mail to: [sean.coyle@stantec.com](mailto:sean.coyle@stantec.com)*)

Dilan Roe, ACEH (*Sent via E-mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org)*)  
Keith Nowell, ACEH (*Sent via E-mail to: [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org)*)  
GeoTracker, 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/](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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> May 15, 2014
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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](mailto: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](mailto: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.

# ATTACHMENT 2



# Fact Sheet

## Well Destruction and Waste Removal Requirements Prior to Underground Storage Tank Case Closure

Background: Proper destruction of wells helps to protect groundwater from potential threats and is a critical component of the Underground Storage Tank (UST) case closure process. The Low-Threat Underground Storage Tank (UST) Case Closure Policy (Policy) mandates that monitoring wells be properly destroyed prior to UST case closure, unless they will be kept and maintained in accordance with applicable local and state requirements. The Policy also mandates that all investigation and remediation-derived waste materials be removed prior to case closure. As of May 15, 2015, there were a total of 836 “Open-Eligible for Closure” cases throughout California, for which remaining wells and wastes served as impediments to closure.

### Information for Responsible Parties and

Site Owners: If you received a letter from the State Water Resources Control Board (State Water Board), Regional Water Quality Control Board, or a local agency directing well destruction and waste removal, you must take action before your UST case can be closed. A uniform closure letter (UCL) will not be issued for your case until the wastes are removed and the wells are either destroyed or approved for continued maintenance by the regulatory agency overseeing your UST case. Your local well permitting agency may require ongoing monitoring of wells even though the regulatory agency is not requiring it, so additional costs may be incurred. A list of open cases with directives to destroy wells and remove wastes can be viewed on the public GeoTracker webpage at: [http://geotracker.waterboards.ca.gov/ptcp\\_destruction\\_report.asp](http://geotracker.waterboards.ca.gov/ptcp_destruction_report.asp).

**Note:** The State Water Board has the authority to administratively impose civil penalties of up to \$10,000 per day per UST on responsible parties and site owners that fail to comply with the requirements of UST case closure order. **Do not let penalties be imposed on you!**

The contractor that helped you with corrective actions at your site can provide more information about the well destruction and waste removal process. If you do not currently have a contractor, you can contact the regulatory agency that is responsible for oversight of your UST case and ask if they have a list of contractors in the area. Your regulatory agency can also let you know if your contractor is required to submit a work plan for approval before well destruction and waste removal begins. Once the work is complete, submit confirmation documentation to the regulatory agency overseeing your UST case. After the well and waste

**Important:** Check the current standing of any contractor with the California Contractors State License Board. You can do this at the following location on the web: <https://www2.cslb.ca.gov/OnlineServices/CheckLicense.aspx>



removal has been completed, approved by your regulatory agency, and communicated to the State Water Board, a UCL will be issued and uploaded to GeoTracker.

If you have an eligible claim with the UST Cleanup Fund, the cost of well destruction is considered corrective action and reasonable and necessary costs are typically reimbursable. Monitoring of wells after you have been informed that the wells should be destroyed is not normally considered to be corrective action and may not be eligible for reimbursement. Additional information can be obtained on the State Water Board UST Cleanup Fund (Fund) website at: [http://www.waterboards.ca.gov/water\\_issues/programs/ustcf/](http://www.waterboards.ca.gov/water_issues/programs/ustcf/). You may also contact the Fund staff by email: [ustcleanupfund@waterboards.ca.gov](mailto:ustcleanupfund@waterboards.ca.gov), message phone line: 1-800-813-Fund (3863), or fax: 916-341-5806.

Information for Consultants/Contractors/Drillers: A list of open cases with directives to destroy wells can be viewed on the public GeoTracker webpage at: [http://geotracker.waterboards.ca.gov/ptcp\\_destruction\\_report.asp](http://geotracker.waterboards.ca.gov/ptcp_destruction_report.asp). Seek approval with regulatory agencies having jurisdiction before performing any well destruction work. Encroachment permits and/or access agreements may also be necessary. A list of local well-permitting agencies can be found at: <http://water.ca.gov/groundwater/wells/permitting.cfm>

Reference: *Plan for Implementation of Low-Threat UST Case Closure Policy and Additional Program Improvements*  
([http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/resolutions/2012/110612\\_6\\_final\\_ltcp%20imp%20plan.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2012/110612_6_final_ltcp%20imp%20plan.pdf)).

*(This fact sheet was last updated May 21, 2015.)*

**ATTACHMENT 3**

**Alameda County Environmental Health  
Correspondence dated July 23, 2015**



## Nowell, Keith, Env. Health

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**From:** Nowell, Keith, Env. Health  
**Sent:** Thursday, July 23, 2015 11:27 AM  
**To:** 'Coyle, Sean'  
**Cc:** 'Arceneaux, Nicole Marie'; Ed.C.Ralston@p66.com; Roe, Dilan, Env. Health  
**Subject:** RE: 376 Lewelling, San Lorenzo (Case No. RO0000344 - Unocal #5760) - NFA Inquiry

Sean,

Thank you for the update. Please upload a Revised Well Destruction Report with the disposal documentation included as an attachment. In your report please include the language that all remaining investigation, remediation and well destruction derived waste has been removed from the site.

The report upload will complete your tasks for the NFA determination. Upon acceptance, ACEH will have 30 days to complete the case closure process.

Thank you for your cooperation.

Regards,  
Keith Nowell

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**From:** Coyle, Sean [mailto:Sean.Coyle@stantec.com]  
**Sent:** Thursday, July 23, 2015 10:15 AM  
**To:** Nowell, Keith, Env. Health <Keith.Nowell@acgov.org>  
**Subject:** 376 Lewelling, San Lorenzo (Case No. RO0000344 - Unocal #5760) - NFA Inquiry

Hello Keith –

I am emailing to follow-up on the final no further action status related to Case No. RO0000344 (376 Lewelling, San Lorenzo). The site related wells were destroyed in March and the Well Destruction Report associated with the activities was submitted on April 6, 2015. One thing that was not included in the well destruction report was the details of the transportation and disposal of the derived waste. That part of the project is managed by another consultant, but I have received summary/report from them documenting those efforts which is attached. If I upload this summary to the County ftp will it complete the details and information needed to issue the final NFA determination?

Thanks,

**Sean Coyle**

Associate Scientist  
Stantec  
3017 Kilgore Road Suite 100 Rancho Cordova CA 95670-6150  
Phone: (916) 384-0740  
Cell: (916) 281-8975  
Fax: (916) 861-0430  
Sean.Coyle@stantec.com



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**From:** Bemis, Tessa [mailto:Tessa.Bemis@ghd.com]  
**Sent:** Thursday, July 23, 2015 9:50 AM  
**To:** Coyle, Sean  
**Subject:** RE: Project Summary -Former Unocal 351561~MSC-061623-WR2959~

Hey Sean –

I had to use the 2big4email due to Chevron's file size restriction. Please find the summary attached for your records.

Have a great vacation!

**Tessa Bemis**  
Waste Services

**GHD**

T: +1 510 420 3322 | M: +1 510 294 0651 | E: [tessa.bemis@ghd.com](mailto:tessa.bemis@ghd.com)  
5900 Hollis Street, Suite A Emeryville, California 94608 United States | [www.ghd.com](http://www.ghd.com)

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**From:** Coyle, Sean [mailto:Sean.Coyle@stantec.com]  
**Sent:** Thursday, July 23, 2015 8:26 AM  
**To:** Bemis, Tessa  
**Subject:** RE: Project Summary -Former Unocal 351561~MSC-061623-WR2959~

Good Morning Tessa –

I unfortunately didn't get into that "2 Big 4 Email" link before it expired to pull the project summary for 351561 out prior to my departure for vacation. Would you mind re forwarding that summary to me at your earliest convenience?

Thanks,

**Sean Coyle**

Associate Scientist  
Stantec  
3017 Kilgore Road Suite 100 Rancho Cordova CA 95670-6150  
Phone: (916) 384-0740  
Cell: (916) 281-8975  
Fax: (916) 861-0430  
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**From:** Bemis, Tessa [<mailto:tbemis@croworld.com>]  
**Sent:** Friday, June 19, 2015 10:01 AM  
**To:** Coyle, Sean  
**Subject:** RE: Project Summary -Former Unocal 351561~MSC-061623-WR2959~

Oh no! I'll re-send it this morning. Sorry about that!

**Tessa Bemis**

**Conestoga-Rovers & Associates (CRA)**

5900 Hollis Street, Suite A  
Emeryville, CA, USA 94608

Phone: 510.420.3322

Cell: 510-294-0651

Email: [tbemis@croworld.com](mailto:tbemis@croworld.com)

[www.CRAworld.com](http://www.CRAworld.com)

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**From:** Coyle, Sean [<mailto:Sean.Coyle@stantec.com>]  
**Sent:** Friday, June 19, 2015 9:59 AM  
**To:** Bemis, Tessa  
**Subject:** RE: Project Summary -Former Unocal 351561~MSC-061623-WR2959~

Hello Tessa –

I am needing to provide documentation to the County that the waste generated during the completed well destruction has been removed from the site. The email you sent below didn't appear to have an attachment associated with it – can you please resend that to me so that I can relay it to the regulator. If the attached summary doesn't contain the transport and disposal documentation can you please send that along as well. Let me know if there are any questions.

Thanks and happy Friday!

**Sean Coyle**

Associate Scientist  
Stantec  
3017 Kilgore Road Suite 100 Rancho Cordova CA 95670-6150  
Phone: (916) 384-0740  
Cell: (916) 281-8975  
Fax: (916) 861-0430  
[Sean.Coyle@stantec.com](mailto:Sean.Coyle@stantec.com)



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**From:** Bemis, Tessa [<mailto:tbemis@croworld.com>]  
**Sent:** Thursday, June 11, 2015 5:42 PM  
**To:** North America Waste Tracking Desk  
**Cc:** Arceneaux, Nicole Marie; Coyle, Sean; Daniels, DiMonique  
**Subject:** Project Summary -Former Unocal 351561~MSC-061623-WR2959~

Kathy et al.,

Please find the attached project summary for Waste Request 2959 for the "Former Unocal 351561" entity located in San Lorenzo, CA.

Let me know if you have any questions or if I can be of further assistance.

Regards,

**Tessa Bemis**  
**Conestoga-Rovers & Associates (CRA)**  
5900 Hollis Street, Suite A  
Emeryville, CA, USA 94608

Phone: 510.420.3322  
Cell: 510-294-0651  
Email: [tbemis@croworld.com](mailto:tbemis@croworld.com)  
[www.CRAworld.com](http://www.CRAworld.com)

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**We are changing our name to GHD in July! To learn more about CRA's merger with GHD, visit**  
[www.CRAworld.com/ghd](http://www.CRAworld.com/ghd)

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