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
ALAMEDA, CA 94502
(510) 567-6700
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June 29, 2018

Snow Cleaners, Inc.
c/o Harold & Lorraine Turner
2678 Coolidge Ave
Oakland CA, 94601

Subject: **Request for Stakeholders Meeting**
Leaking Underground Storage Tank (LUST) Cleanup Site Case No. RO0000357
GeoTracker Global ID T0600101294
Snow Cleaners Inc
2678 Coolidge, Oakland, CA 94601

Dear Responsible Party(ies):

I would like to take this opportunity to introduce myself as the new primary caseworker assigned to the subject LUST Cleanup Site Case (the "Case"). Alameda County Department of Environmental Health (ACDEH) has reviewed the case file associated with the above referenced property (the "Site") and the Case in accordance with the State Water Resources Control Board's (State Water Board's) Low Threat Underground Storage Tank Case Closure Policy (LTCP). ACDEH's evaluation included, but was not limited to, the review of the following document(s):

1. *Revised Review Summary Report* dated June 21, 2016 (the "State Water Board 2016 Review") prepared by the State Water Board.

2. *Crawl Space Air Sampling Report* dated May 9, 2016 (the "Crawl Space Sampling Report") prepared by P&D Environmental, Inc. (P&D) on behalf of Snow Cleaners, Inc. and submitted to ACDEH as requested in ACDEH's directive letter dated January 20, 2016.

ACDEH has determined that the Case does not meet the LTCP closure criteria indicated in Table 1 below:

Table 1 – Unsatisfied LTCP Closure Criteria

General Criteria				Media Specific Criteria	
☐	a. Public Water	☐	e. CSM	☑	1. Groundwater
☐	b. Petroleum Only	☐	f. Secondary Source	☑	2. Petroleum Vapor Intrusion to Indoor Air
☐	c. Release Stopped	☐	g. MTBE	☐	3. Direct Contact and Outdoor Air Exposure
☑	d. Free Product	☐	h. Nuisance		

An LTCP criteria evaluation checklist is provided in **Attachment A**. Specific details pertaining to ACDEHs evaluation of the LTCP closure criteria indicated above that are not met at this time are provided in ***Section I*** of this letter. ACDEH's response to the documents listed above are provided in ***Section II***. An evaluation of the case's GeoTracker compliance is included in ***Section III***. Deliverables and technical reports requested to address unsatisfied LTCP closure criteria, ACDEH's response to submittals, or other impediments to regulatory case closure are summarized in ***Section IV***.

I. UNSATISFIED LTCP CLOSURE CRITERIA EVALUATION

The following unsatisfied LTCP closure criteria were identified during ACDEH's review of the case file. Excerpts from the LTCP are included in *grey italics*.

General Criteria

d. Free product has been removed to the maximum extent practicable

"In meeting the requirements of this section: (a) Free Product shall be removed in a manner that minimizes the spread of unauthorized release…(b)Abatement of free product migration shall be used as a minimum [design] objective…and (c) Flammable products shall be stored for disposal in a safe and competent manner..."

ACDEH's review of the case file indicates that free product has been observed in influent streams of the on-site dual phase extraction (DPE) system and within extraction wells DP1 and DP3 as recently as February of 2016 and June of 2016. The last correspondence or technical report available on geotracker which provided an update regarding the status or operation of the DPE system, free product recovery activities, or groundwater sampling and monitoring activities is email correspondence dated July 21, 2016.

Based on the lines of evidence presented above, and in accordance with the State Water Board 2016 Review, ACDEH has determined that insufficient evidence has been presented to support the assertion that ***General Criteria d.*** has been satisfied.

Media Specific Criteria

1. Groundwater

"If groundwater with a designated beneficial use is affected by an unauthorized release, to satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites listed [in the policy and summarized in Table 2 below]. A plume that is "stable or decreasing" is a contaminant mass that has expanded to its maximum extent: the distance from the release where attenuation exceeds migration.

...Sites with soil that does not contain sufficient mobile constituents…to cause groundwater to exceed the groundwater criteria in this policy shall be considered low-threat sites for the groundwater medium."

ACDEH's review of the case file indicates that insufficient evidence has been presented to support the determination that the Site meets the characteristics of any of the Groundwater Site Classes summarized in Table 2 below.

Table 2 - Summary of Groundwater Site Class Requirements	Groundwater Site Class				
	(1)	(2)	(3)	(4)	(5)
Plume is stable or decreasing in areal extent	Yes	Yes	Yes	Yes	Yes
Maximum allowable plume Length (feet)	100	250	250	1,000	-
Free Product not present [N] or removed to extent practicable[A] [R]	N	N	R	N	-
Minimum required distance to nearest existing water supply well or surface water body (feet)	250	1,000	1,000	1,000	-
Maximum allowable benzene concentration in Groundwater (µg/L)	-	3,000	-	1,000	-
Maximum allowable MTBE concentration in groundwater (µg/L)	-	1,000	-	1,000	-
Potential land use restriction as a condition of closure	-	-	Yes	-	-
Regulatory determination that contaminant plume poses a low threat to human health and safety and to the environment and water quality objectives will be achieved in a reasonable timeframe	-	-	-	-	Yes

"-" = criteria not applicable to site class; "µg/L" = micrograms of analyte per liter of sample; [A] = Free product may still be present below the site where the release originated, but does not extend off-site.

In concurrence with the State Water Boards 2016 Review ACDEH has determined that the presence of recoverable free product discussed in ***Section I.d*** precludes the Site from meeting the criteria for the Groundwater Site Classes.

ACDEH notes that correspondence or technical reports regarding the status of corrective actions, groundwater monitoring and sampling efforts, or other environmental conditions have not been posted to GeoTracker since the email correspondence dated July 21, 2016.

2. Vapor Intrusion to Indoor Air

"Petroleum releases shall satisfy the media-specific criteria for petroleum vapor intrusion to indoor air and be considered low-threat for vapor-intrusion-to-indoor-air pathway if:

a. Site-specific conditions at the release site satisfy all of the characteristics and criteria of scenarios 1 through 3 as applicable, or all the characteristics and criteria of scenario 4 as applicable [These scenarios are summarized in Table 3 below]; or

b. A site-specific risk assessment for vapor intrusion pathway is conducted and demonstrates that human health is protected to the satisfaction of the regulatory agency; or

c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, the regulatory agency determines that petroleum vapors migrating from soil or groundwater will have no significant risk of adversely affecting human health.

…satisfaction of the media-specific criteria for petroleum vapor intrusion to indoor air is not required at active commercial petroleum fueling facilities, except in cases where release characteristics can be reasonably believed to pose an unacceptable health risk."

ACDEH's review of the case file indicate that the Site meets LTCP Criterion 2a by Exposure Scenario 3b, however, Site specific conditions are present which indicate that LTCP vapor intrusion to indoor air exposure scenarios may not be appropriate for this Site. In 2010 and 2016, air samples were collected from crawl spaces of residential buildings in the immediate vicinity of the Site. The analytical results of these crawl space samples indicates that benzene and naphthalene are present in crawl space air in excess of the applicable screening levels that are protective of human health. ACDEH notes that the most recently reported crawl space air samples were collected in April 2016 during the operation of the on-Site Soil Vapor Extraction (SVE) system. Therefore, ACDEH has concluded that due to Site specific conditions (i.e., secondary porosity, preferential pathways, or the presence of uncharacterized contamination in shallow soils) there is insufficient attenuation of petroleum vapors in the bio-attenuation zone for the application of the LTCP Vapor Intrusion to Indoor Air Exposure Scenarios. As such it is ACDEH, has determined that it is inappropriate to close the Case under LTCP Criteria 2.a.

Table 3 - Petroleum Vapor Intrusion to Indoor Air Exposure Scenario Characteristics and Criteria	**Exposure Scenario**								
	1	**2**	**3**			**4**			
			a	**b**	**c**	**a**	**b**	**c**	**d**
Bounds of BAZ	BoF to LNAPL in GW	BoF to LNAPL in Soil	BoF to Max GW			-		BOF to 5' below BoF	GS to 5' below GS
Minimum BAZ Length	30'	30'	5'	10'	5'	-		5'	
TPH in BAZ Threshold (mg/kg)	<100	<100	<100			-		<100	
Benzene in GW Threshold (µg/L)	-	-	<100	≥100 and <1,000	<1,000	-		-	
Soil Gas Sample Depth	-	-	-			5' below BoF	5' below GS	5' below BoF	5' below GS
Oxygen in BAZ	-	-	Unk or <4%	Unk or <4%	≥4%	-		≥4%	
Benzene in soil gas of BAZ RES / COM	-	-	-			<85 / <280		<85,000 / <280,000	
Ethylebenzene in soil gas of BAZ RES / COM	-	-	-			<1,100 / <3,600		<1,100,000 / <3,600,000	
Napthalene in soil gas of BAZ RES / COM	-	-	-			<93 / <310		<93,000 / <310,000	

"-": Criteria not applicable to exposure scenario; "BAZ": Bioattenuation Zone; "BoF": Base of Foundation; "LNAPL": unweathered light non-aqueous phase liquid; "Max GW": maximum recorded historic groundwater elevation; " ' ": feet; "GS": existing ground surface; "TPH": sum of gasoline range and diesel range total petroleum hydrocarbons; "mg/kg": miligrams of analyze per kilograms of sample; "µg/L": micrograms of analyte per liter of sample; "Unk": Unknown; "RES": residential; "COM": commercial;

II. ACDEH RESPONSE TO SUBMITTALS

1. State Water Board 2016 Review

The State Water Board 2016 Review concluded that the presence of free product at the Site is an impediment to closure under the LTCP. The State Water Board noted that further cleanup and/or characterization of non-petroleum contaminants may be warranted at the site under the oversight of a Site Cleanup Program case. The State Water Board recommended the following be conducted prior to making any closure determinations or before opening up a SCP case for the Site:

a. Remove free product to the extent practicable;

b. Perform forensic analyses to characterize free product.

ACDEH concurs with the recommendations and findings of the State Water Board 2016 Review.

2. Crawl Space Sampling Report

The crawl space sampling report documents crawl space and ambient air sampling efforts conducted on April 26, 2016. The crawl space and ambient air samples were collected during the operations of the on-site soil vapor extraction system which was restarted on April 11, 2016. Based on the results of the April 2016 crawl space sampling efforts, crawl space air quality has improved since the previous sampling event in 2010, however, crawl

space air does not meet air quality objectives for benzene or naphthalene. The Crawl Space Sampling Report recommends increasing throughput of the SVE system and resampling of crawl spaces CS1, CS2, and CS3.

ACDEH concurs with the conclusion that crawl space air quality has improved relative to the 2010 sampling event and with the recommendation of increasing SVE system throughout as a contingency measure to mitigate vapor intrusion of petroleum constituents benzene and naphthalene. ACDEH also notes that reporting limits for naphthalene in the ambient and crawl space samples are above the applicable risk based screening level derived from the San Francisco Bay Regional Water Board's Environmental Screening Levels (ESLs) dated February 2016. Furthermore, benzene is reported in ambient air in excess of the applicable indoor air ESL, however, the concentrations of benzene in crawl space samples CS1 and CS2 are greater than the ambient air concentration by approximately the same amount as the applicable ESL. As such, the analysis of the risk to occupants due to vapor intrusion is inconclusive at this time. Based on the effectiveness of implementation of these contingency measures, ACDEH may request additional efforts to mitigate the intrusion of petroleum vapors into crawl space air at the Site.

III. GEOTRACKER COMPLIANCE

ACDEH's review of the case file included a GeoTracker compliance audit. GeoTracker reporting requirements are described in Section 3893 of the California Code of Regulations. Non-compliant GeoTracker requirements identified as part of ACDEH's compliance audit are identified in the table below.

Table 4 – Non-compliant GeoTracker Requirements

☐	Latitude and longitude of wells (GEO_XY)	☒	Depth and length of screened interval of wells (Field Point ID)
☐	Surveyed elevation of wells (GEO_Z)	☒	Boring log (GEO_BORE)
☐	Elevation of groundwater in wells (GEO_WELL)	☒	Technical report (GEO_REPORT)
☐	Site map(s) depicting location of all sampling points (GEO_MAP)		

a. **Field Point ID** – Field point ID's for MW-1 and MW-2 do not include the depth or length of the screened interval.

b. **Boring Log** – ACDEH's review of the case file indicates that GEO_BORE boring logs are missing for several borings advanced at the Site, including but not limited to: MW-1, MW-2, DP-1 through DP-4, VE1, VE2.

c. **Missing Remediation Status/Groundwater Monitoring Reports** - Technical reports documenting on-going groundwater sampling and monitoring activities and providing updates on corrective actions have not been uploaded since June 2013. Email correspondence between April 2016 and July 2016 indicates that groundwater and soil vapor extraction operations were restarted in April 2016 and were still in operation as of the date of last correspondence in July 2016. Additionally, monitoring reports from 2011 and prior to the second semester of 2009 have not been uploaded

IV. DELIVERABLE AND TECHNICAL REPORT REQUEST(S)

Please submit the following technical reports and deliverables to ACDEH (Attention: Jonathan Sanders) in accordance with the compliance dates provided below and the *Responsible Party(ies) Legal Requirements/Obligations* and the *File Names for Electronic Reports* which are included as **Attachment B** and **Attachment C** respectively. These technical reports are being requested pursuant to Section 25296.10 of the

California Health and Safety Code and Article 11, Chapter 16, Division 3 of Title 23 of the California Code of Regulations. Failure to comply with the deliverable and technical report request compliance dates listed below could result in enforcement action(s) as described in Attachment B.

1. Work Plan for Forensic Analysis of Free Product
Compliance Date: August 24, 2018

Please prepare a work plan to conduct a forensic analysis of the free product identified in extraction wells and the remediation system at the Site. The purpose of this forensic analysis should be to determine if the free product identified at the Site is associated with the unauthorized release for the Case. The Work Plan must be prepared in general accordance with the State Water Boards *Leaking Underground Fuel Tank Guidance Manual* (the LUFT Manual) and the scope of work proposed must be supported by a current CSM. At a minimum the Work Plan must contain the following elements:

a. A CSM reflecting current site conditions and identifying data gaps that must be addressed to satisfy LTCP closure criteria. ACDEH recommends that the CSM be prepared using ACDEH's tabular format. A template for the preparation of a CSM following this tabular format is available on request;

b. A description of the Scope of Work (SOW) with technical justification for monitoring well and/or sample location selection that is supported by the CSM to address data gaps identified in the CSM as impediments to closure under the LTCP. If a dynamic work plan is used, decision criteria should be identified and described;

c. A sampling and analysis plan, including identification of DQOs, analytical methods, sampling methods, sampling intervals and criteria, and quality control and quality assurance measures; Sampling methods must reference an Standard Operating Procedure which must be included as an appendix; and

d. A description of reporting requirements.

2. Remediation Status Report
Compliance Date: August 24, 2018

Please prepare a remediation status report documenting the current status of corrective actions at the Site. This status report must include the following components:

a. Narrative update on the operational status and performance of the remediation system;

b. Narrative update on air quality monitoring conducted in crawl spaces at adjacent properties;

c. Narrative update on groundwater monitoring and sampling conducted;

d. Up-to-date piping and instrumentation diagram of the remediation system;

e. Supporting documentation of engineering calculations of cumulative mass removal and current mass removal rates for each stream (vapor and liquid);

f. Tabular records of operational periods for each stream, including flow rates, influent and effluent concentrations, engineering calculations for mass removal rates, engineering

calculations for cumulative mass removed, and identification of planned and unplanned shutdowns or maintenance;

g. Tables summarizing soil vapor, indoor air, crawl space, and ambient air sampling efforts during this and historical reporting periods;

h. Tables summarizing groundwater monitoring and sampling results during this and previous reporting periods;

i. Copies of field notes from any activities conducted since the last reporting period;

3. Stakeholders Meeting
Compliance Date: September 14, 2018

Please coordinate with the primary caseworker to schedule a stakeholders meeting to discuss the status of the Site and the path to closure under the LTCP and the potential for opening up a SCP case for the Site to pursue characterization and remediation of non-petroleum contamination at the Site. The stakeholders meeting must be held before the compliance date listed above.

V. OUTSTANDING COMPLIANCE ISSUES

ACDEH's review of the case file has identified the following past due deliverables or technical reports or non-compliant GeoTracker requirements. Please resolve these compliance issues by the revised compliance date indicated below. Failure to resolve these compliance issues may result in enforcement actions being taken.

Title of Deliverable or Technical Report Requested	Date of Request	Original Compliance Date	Revised Compliance Date
Field Point ID	<2003	<2003	08/24/2018
GEO_BORE	Multiple	Multiple	08/24/2018
Remediation Status / Groundwater Monitoring Reports	Multiple	Multiple	08/24/2018

VI. 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 LTCP Closure Criteria Evaluation Checklist

Attachment B Responsible Party(ies) Legal Requirements / Obligations

Attachment C 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)

Jonathan Sanders, ACDEH, Senior Hazardous Materials Specialist (Sent via E-mail to: jonathan.sanders@acgov.org)

Paul King, P&D, Project Manager (sent via E-mail to: paul.king@pdenviro.com; pdking0000@aol.com)

ATTACHMENT A

LTCP Closure Criteria Evaluation Checklist

SNOW CLEANERS INC (T0600101294) - MAP THIS SITE

PUBLIC PAGE

2678 COOLIDGE
OAKLAND , CA 94601
ALAMEDA COUNTY
LUST CLEANUP SITE (INFO)
STATUS: OPEN - REMEDIATION

PERTINENT INFORMATION:
CUF Claim #: 16147 **CUF Priority Assigned:** B **CUF Amount Paid:** $442,359

CLEANUP OVERSIGHT AGENCIES
ALAMEDA COUNTY LOP *(LEAD)* - *CASE #: RO0000357* - *DILAN ROE* - *JONATHAN E. SANDERS*
SAN FRANCISCO BAY RWQCB (REGION 2) - *CASE #: 01-1400* - *Regional Water Board*

THIS PROJECT WAS LAST MODIFIED BY ***SIENNA WHEELER*** ON 6/28/2018 1:11:40 PM - HISTORY

CLOSURE POLICY

THIS VERSION IS FINAL AS OF 5/10/2018

CHECKLIST INITIATED ON 12/27/2012

CLOSURE POLICY HISTORY

General Criteria - *The site satisfies the policy general criteria* - CLEAR SECTION ANSWERS — **NO**

a. Is the unauthorized release located within the service area of a public water system? — ◉ YES ○ NO
Name of Water System : EBMUD

b. The unauthorized release consists only of petroleum (info). — ○ YES ◉ NO
Contaminants : ☐ Chlorobenzene ☑ PCE ☐ TCE ☐ Chloroform ☐ Vinyl Chloride ☐ Bromoform
☐ **Other:**

c. The unauthorized ("primary") release from the UST system has been stopped. — ◉ YES ○ NO

d. Free product has been removed to the maximum extent practicable (info). — ○ FP Not Encountered ○ YES ◉ NO
Free Product Remaining: Measurable Free Product
Removal Methods Tried : ☐ HVDPE ☑ Skimmer ☐ Bailing ☐ Absorbant Materials ☐ Did Not Try to Remove FP ☐ OTHER:

e. A conceptual site model that assesses the nature, extent, and mobility of the release has been developed (info). — ◉ YES ○ NO

f. Secondary source has been removed to the extent practicable (info). — ○ YES ◉ NO
Impediment to Removing Secondary Source (Check all that Apply):
☐ Remediation Has Not Been Attempted
☐ Remediation Was Designed Incorrectly
☐ Remediation Was Shut Off Prematurely
☐ Poor Remediation O&M
☑ Other -
Remediaton in progress

g. Soil or groundwater has been tested for MTBE and results reported in accordance with Health and Safety Code Section 25296.15. — ○ Not Required ◉ YES ○ NO

h. Does a nuisance exist, as defined by Water Code section 13050. — ○ YES ◉ NO

1. Media-Specific Criteria: Groundwater - *The contaminant plume that exceeds water quality objectives is stable or decreasing in areal extent, and meets all of the additional characteristics of one of the five classes of sites listed below.* - CLEAR SECTION ANSWERS — **NO**

EXEMPTION - Soil Only Case (Release has not Affected Groundwater - Info) — ○ YES ◉ NO

Does the site meet any of the Groundwater specific criteria scenarios? — ○ YES ◉ NO

ADDITIONAL QUESTIONS - Please indicate only those conditions that do not meet the policy criteria:

Plume Length (That Exceeds Water Quality Objectives) :
○ ≥ 100 Feet and < 250 Feet ◉ ≥ 250 Feet and < 1,000 Feet ○ ≥ 1,000 Feet ○ Unknown

Plume is Stable or Decreasing in AREAL Extent :
○ No ○ Unknown

Free Product in Groundwater :
○ Yes ○ No ○ Unknown

Free Product Has Been Removed to the Maximum Extent Practicable :
○ No ○ Unknown

For sites with free product, the Plume Has Been Stable or Decreasing for 5-Years (info) :
○ No ○ Unknown

For sites with free product, owner Willing to Accept a Land Use Restriction (if required) :
○ No ○ Unknown

Free Product Extends Offsite :
○ Yes ○ Unknown

Benzene Concentration :
○ ≥ 1,000 µg/l and < 3,000 µg/l ○ ≥ 3,000 µg/l ○ Unknown

MTBE Concentration :
○ ≥ 1,000 µg/l ○ Unknown

Nearest Supply Well (From Plume Boundary) :
○ ≤ 250 Feet ◉ > 250 Feet and ≤ 1,000 Feet ○ Unknown

Nearest Surface Water Body (From Plume Boundary) :
○ ≤ 250 Feet ◉ > 250 Feet and ≤ 1,000 Feet ○ Unknown

2. Media Specific Criteria: Petroleum Vapor Intrusion to Indoor Air - *The site is considered low-threat for the vapor-intrusion-to-air pathway if site-specific conditions satisfy items 2a, 2b, or 2c* - CLEAR SECTION ANSWERS — **NO**

EXEMPTION - Active Commercial Petroleum Fueling Facility — ○ YES ◉ NO

Does the site meet any of the Petroleum Vapor Intrusion to Indoor Air specific criteria scenarios? — ○ YES ◉ NO

ADDITIONAL QUESTIONS - Please indicate only those conditions that do not meet the policy criteria:

Soil Gas Samples :
○ No Soil Gas Samples ○ Taken Incorrectly

Exposure Type :
◉ Residential ○ Commercial

Free Product :
◉ In Groundwater ○ In Soil ○ Unknown

TPH in the Bioattenuation Zone :
○ ≥ 100 mg/kg ◉ Unknown ○ Soil samples not taken at two depths within 5 ft. zone (only for Scenario 4 with BioZone)

Bioattenuation Zone Thickness :
○ < 5 Feet (No BioZone) ○ ≥ 5 Feet and < 10 Feet ○ ≥ 10 Feet and < 30 Feet ○ ≥ 30 Feet ○ 30ft BioZone Compromised TPH > 100mg/kg ◉ Unknown

O2 Data in Bioattenuation Zone :
○ No O_2 Data ○ O_2 < 4% ○ O_2 ≥ 4%

Benzene in Groundwater :
○ ≥ 100 µg/l and < 1,000 µg/l ○ ≥ 1,000 µg/l ○ Unknown

Soil Gas Benzene :
○ ≥ 85 µg/m^3 and < 280 µg/m^3 ○ ≥ 280 µg/m^3 and < 85,000 µg/m^3 ○ ≥ 85,000 µg/m^3 and < 280,000 µg/m^3 ○ ≥ 280,000 µg/m^3 ○ Unknown

Soil Gas EthylBenzene :
○ ≥ 1,100 µg/m^3 and < 3,600 µg/m^3 ○ ≥ 3,600 µg/m^3 and < 1,100,000 µg/m^3 ○ ≥ 1,100,000 µg/m^3 and < 3,600,000 µg/m^3 ○ ≥ 3,600,000 µg/m^3 ○ Unknown

Soil Gas Naphthalene :
○ ≥ 93 µg/m^3 and < 310 µg/m^3 ○ ≥ 310 µg/m^3 and < 93,000 µg/m^3 ○ ≥ 93,000 µg/m^3 and < 310,000 µg/m^3 ○ ≥ 310,000 µg/m^3 ○ Unknown

3. Media Specific Criteria: Direct Contact and Outdoor Air Exposure - *The site is considered low-threat for direct contact and outdoor air exposure if it meets 1, 2, or 3 below.* - CLEAR SECTION ANSWERS **NO**

EXEMPTION - The upper 10 feet of soil is free of petroleum contamination ○ YES ◉ NO

Does the site meet any of the Direct Contact and Outdoor Air Exposure criteria scenarios? ○ YES ◉ NO

ADDITIONAL QUESTIONS - Please indicate only those conditions that do not meet the policy criteria:

Exposure Type :
◉ Residential ○ Commercial ○ Utility Worker

Petroleum Constituents in Soil :
○ ≤ 5 Feet bgs ○ >5 Feet bgs and ≤10 Feet bgs ○ Unknown

Soil Concentrations of Benzene :
○ > 1.9 mg/kg and ≤ 2.8 mg/kg ○ > 2.8 mg/kg and ≤ 8.2 mg/kg ○ > 8.2 mg/kg and ≤ 12 mg/kg ○ > 12 mg/kg and ≤ 14 mg/kg ○ > 14 mg/kg ○ Unknown

Soil Concentrations of EthylBenzene :
○ > 21 mg/kg and ≤ 32 mg/kg ○ > 32 mg/kg and ≤ 89 mg/kg ○ > 89 mg/kg and ≤ 134 mg/kg ○ > 134 mg/kg and ≤ 314 mg/kg ○ > 314 mg/kg ○ Unknown

Soil Concentrations of Naphthalene :
○ > 9.7 mg/kg and ≤ 45 mg/kg ○ > 45 mg/kg and ≤ 219 mg/kg ○ > 219 mg/kg ◉ Unknown

Soil Concentrations of PAH :
○ > 0.063 mg/kg and ≤ 0,68 mg/kg ○ > 0.68 mg/kg and ≤ 4.5 mg/kg ○ > 4.5 mg/kg ○ Unknown

Area of Impacted Soil :
○ Area of Impacted Soil > 82 by 82 Feet ○ Unknown

Additional Information

Should this case be closed in spite of NOT meeting policy criteria? ○ YES ◉ NO

Has this LTCP Checklist been updated for FY 17/18? ◉ YES ○ NO

SPELL CHECK

Save Form as Partially Completed | Save Form as Complete

ATTACHMENT B

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, Division3, 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 values[1] 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	☐	☐	☐	☐	✓
2012 Site Assessment Work Plan	2012	✓	✓			☐	☐	☐	☐	☐
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	☐	☐	☐	✓
				SB-10-6	SO	☐	☐	☐	☐	✓
				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 C

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
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 Management 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 letter)	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