

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
FAX (510) 337-9335

June 29, 2018

Equilon Enterprises, LLC
c/o Andrea Wing
20945 S. Wilmington Ave
Carson, CA 90810
(Sent via E-mail to andrea.wing@shell.com)

Salel Enterprises
c/o Robert Guilford
547 Old Orchard Dr
Danville, CA 94526

**Subject: Request for Stakeholders Meeting
Leaking Underground Storage Tank (LUST) Cleanup Site Case No. RO0000372
GeoTracker Global ID T0600101226
Shell # 129460
15275 Washington Street, San Leandro, CA**

Dear Responsible Party(ies):

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file associated with the above referenced property (the "Site") and evaluated the associated LUST Case (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. *Annual 2018 Groundwater Monitoring Report* dated April 17, 2018 (the "2018 GWM Report") prepared by AECOM on behalf of Equilon Enterprises LLC (Equilon) and submitted to ACDEH in accordance with the current monitoring and reporting schedule.
2. Email correspondence summarizing the action items from the August 2016 stakeholders meeting dated August 17, 2016 (the "Meeting Notes") prepared by AECOM on behalf of Equilon.

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	
<input type="checkbox"/> a. Public Water	<input checked="" type="checkbox"/> e. CSM	<input checked="" type="checkbox"/> 1. Groundwater	
<input type="checkbox"/> b. Petroleum Only	<input checked="" type="checkbox"/> f. Secondary Source	<input checked="" type="checkbox"/> 2. Petroleum Vapor Intrusion to Indoor Air	
<input type="checkbox"/> c. Release Stopped	<input type="checkbox"/> g. MTBE	<input checked="" type="checkbox"/> 3. Direct Contact and Outdoor Air Exposure	
<input checked="" type="checkbox"/> d. Free Product	<input type="checkbox"/> h. Nuisance		

An LTCP criteria evaluation checklist is provided in **Attachment A**. Specific details pertaining to ACDEH's 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**. Procedural impediments to regulatory case closure under the LTCP identified as part of ACDEH's review of the Case files are discussed in **Section IV**. 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 V**.

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**e. A conceptual site model (CSM) that assesses the nature, extent, and mobility of the release has been developed**

“The CSM establishes the source and attributes of the unauthorized release, describes all affected media (including soil, groundwater, and soil vapor as appropriate), describes local geology, hydrogeology and other physical site characteristics that affect contaminant environmental transport and fate, and identifies all confirmed and potential contaminant receptors (including water supply wells, surface water bodies, structures and their inhabitants). ...All relevant site characteristics identified by the CSM shall be assessed and supported by data so that the nature, extent and mobility of the release have been established to determine conformance with applicable criteria in this policy.”

The most recent update to the CSM is provided in the *Updated Site Conceptual Model* dated December 22, 2010 and prepared by Delta Consultants (Delta). ACDEH’s review of the case files indicates that data gaps relative to the completeness of the CSM are present with respect to the evaluation of the Media Specific Criteria for Soil, and Petroleum Vapor Intrusion to Indoor Air which are discussed in **Section I.2**, and **Section I.3** respectively. In addition, ACDEH identified the following data gaps that must be addressed for the CSM to be considered sufficiently complete:

1. **Characterization of Imported Fill Materials** – Characterization of imported fill materials used to backfill excavations associated with the removal/replacement and over-excavation of UST system components in 1986 and 1987 and the installation of the horizontal wells in 1998 has not been provided to ACDEH. ACDEH requires that documentation on the characterization of imported fill materials (either at the time of import or from post installation in-situ sampling) be provided.

f. Secondary source has been removed to the extent practicable

“ Unless site attributes prevent secondary source removal... petroleum-release sites are required to undergo secondary source removal to the extent practicable... ‘To the extent practicable’ means implementing a cost-effective corrective action which removes or destroys-in-place the most readily recoverable fractions of source-area mass... Following removal or destruction of the secondary source, additional removal or active remedial actions shall not be required by regulatory agencies unless (1) necessary to abate a demonstrated threat to human health or (2) the groundwater plume does not meet the definition of low threat as described in this policy.”

Historic secondary source removal efforts conducted at the Site consist of remedial excavation and soil vapor extraction. Soil vapor extraction efforts were conducted at the Site from 1998 to 1999. A 24-hour pilot test for soil vapor extraction was also conducted at the Site in 2009. Soil confirmation samples were collected from outside of the footprint of historic UST holds from locations SB-5, SB-8, SB-12, and SB-14 in 2010. Petroleum concentrations in these soil samples are indirect evidence of the presence of non-aqueous phase (NAPL) petroleum hydrocarbons in soil between five and ten feet below ground surface (ft bgs). Confirmation soil samples have not been collected from within the historic tank holds (e.g the secondary source area). Furthermore, imported soils used to backfill historic excavations has not been characterized. Therefore, based on ACDEH’s review of the Case file, the Site does not currently satisfy General Criteria f.

Media Specific Criteria**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."

Table 2 - Petroleum Vapor Intrusion to Indoor Air Exposure Scenario Characteristics and Criteria	Current Site Conditions	Exposure Scenario								
		1	2	3			4			
				a	b	c	a	b	c	d
Bounds of BAZ	BoF to Max GW (4' below GS)	BoF to uNAPL in GW	BoF to uNAPL in Soil	BoF to Max GW			-	BoF to 5' below BoF	GS to 5' below GS	
BAZ Length	<4' (DTW)	≥30'	≥30'	≥5'	≥10'	≥5'	-	≥5'		
TPH in BAZ (mg/kg)	1,100 (SB-12 @ 6')	<100	<100	<100			-	<100		
Benzene in GW (µg/L)	39 (S-9)	-	-	<100	≥100 and <1,000	<1,000	-	-		
Soil Gas Sample Depth	3 and 5	-	-	-			5' below BoF	5' below GS	5' below BoF	5' below GS
Oxygen in BAZ	<4%	-	-	Unk or <4%	Unk or <4%	≥4%	-	≥4%		
Benzene in soil gas of BAZ	RES 19,000 COM 11,000	-	-	-			<85	<280	<85,000	<280,000
Ethylbenzene in soil gas of BAZ	RES 6,700 COM 120,000	-	-	-			<1,100	<3,600	<1,100,000	<3,600,000
Napthalene in soil gas of BAZ	RES Unknown COM Unknown	-	-	-			<93	<310	<93,000	<310,000

"-": Criteria not applicable to exposure scenario; "BAZ": Bioattenuation Zone; "BoF": Base of Foundation; "uNAPL": unweathered 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": milligrams of analyte per kilograms of sample; "µg/L": micrograms of analyte per liter of sample; "Unk": Unknown; "RES": residential; "COM": commercial; "Unk": Unknown;

ACDEH compared current and historic site conditions to the LTCP's Petroleum Vapor Intrusion to Indoor Air Exposure Scenarios (the "Exposure Scenarios") which are summarized in **Table 3** below. As discussed in **Section 1.f**, there is indirect evidence that NAPL is may be present in environmental media at the Site. Soil vapor samples collected at the Site indicate that a significant portion of the volatile and semi-volatile ranges remain in environmental media at the Site. Depth to groundwater at the Site has historically ranged from approximately 4 to 20 ft bgs. As such the minimum required separation distance for a bioattenuation zone required for Exposure Scenarios 1 through 4 is not present.

Total petroleum hydrocarbons in the gasoline range (TPHg) has been reported in post remediation confirmation soil samples at concentrations as high as 1,100 milligrams of analyte per kilogram of samples (mg/kg). ACDEH notes that post remediation soil samples have not been collected for surface soils (0 to 5 feet bgs) and as such the concentration of TPHg in this interval is currently unknown. The maximum post remediation benzene concentration reported at the Site is 39 µg/L in January 2010 from S-9, however, since 2010, concentrations of benzene in groundwater have

continued to decrease. Direct measurement of soil vapor concentrations has been conducted at multiple times, however, naphthalene soil vapor data has been reported. In the August 2016 stakeholders meeting, ACDEH had requested collection of additional soil gas samples and a risk evaluation by a certified industrial hygienist or toxicologist with 3rd party review. ACDEH noted that in order to complete the evaluation of soil vapor risk, the extents, mobility, and stability of NAPL in shallow soil must be evaluated.

3. Direct Contact and Outdoor Air Exposure

“Release sites where human exposure may occur satisfy the media-specific criteria for direct contact and outdoor air exposure and shall be considered low-threat if they meet any of the following:

- a. *Maximum concentrations of petroleum constituents in soil are less than or equal to those listed in [Table 4 below] for the specified depth below ground surface...; or*
- b. *Maximum concentrations of petroleum constituents in soil are less than levels that a site specific risk assessment demonstrates will have no significant risk of adversely affecting human health; 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 the concentrations of petroleum constituents in soil will have no significant risk of adversely affecting human health.*

ACDEH’s review of the case file indicate that soil analytical data for the 0 to 5 ft bgs interval has not been submitted for the Site. Additionally, ACDEH had identified that Naphthalene has not been assessed in either the 0 to 5 ft bgs interval or the 5 to 10 ft bgs interval. Therefore, there is insufficient evidence to support the determination that **Media Specific Criteria for Direct Contact and Outdoor Air Exposure** have been satisfied.

Table 3 - Concentrations of Petroleum Constituents in Soil That Will Have No Significant Risk of Adversely Affecting Human Health (adapted from Table 1 of the LTCP)

Chemical	Residential		Commercial/Industrial		Utility Worker
	0 to 5 feet bgs (mg/kg)	5 to 10 feet bgs (mg/kg)	0 to 5 feet bgs (mg/kg)	5 to 10 feet bgs (mg/kg)	0 to 10 feet bgs (mg/kg)
Benzene	1.9	2.8	8.2	12	14
Ethylbenzene	21	32	89	134	314
Naphthalene	9.7	9.7	45	45	219
PAH	0.063	-	0.68	-	4.5

“mg/kg”: milligrams of analyte per kilogram of sample; “PAH”: Poly-aromatic hydrocarbons based on the seven carcinogenic ; “-”: Not applicable;

II. GEOTRACKER ELECTRONIC SUBMITTAL OF INFORMATION COMPLIANCE

ACDEH’s review of the case file included a GeoTracker Electronic Submittal of Information (ESI) 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

<input checked="" type="checkbox"/>	Latitude and longitude of wells (GEO_XY)	<input type="checkbox"/>	Surveyed elevation of wells (GEO_Z)
<input type="checkbox"/>	Elevation of groundwater in wells (GEO_WELL)	<input checked="" type="checkbox"/>	Boring log (GEO_BORE)
<input type="checkbox"/>	Technical report (GEO_REPORT)	<input checked="" type="checkbox"/>	Laboratory Electronic Data Files (EDF)
<input checked="" type="checkbox"/>	Depth and length of screened interval of wells (Field Point ID)	<input checked="" type="checkbox"/>	Site map(s) depicting location of <u>all</u> sampling points (GEO_MAP)

1. GEO_XY - Surveyed latitude and longitude data was identified as absent for all soil gas probes;
2. GEO_BORE – Boring logs have not been uploaded for any field points;
3. EDF – Laboratory EDF data has not been uploaded for any soil data prior to June of 2010;
4. Field Point ID – Depth to top of casing and length of screened interval data is missing for all wells and soil gas probes;
5. GEO_MAP – The last updated GEO_MAP for the Site is dated January 30, 2012 and omits field points for soil sample locations and does not include the locations, depths, or extents of historic remedial excavations at the Site. Please update the GEO_MAP to include all field points, current and historical infrastructure, current and historic locations of UST system components, streets bordering the Site, and other relevant features (i.e. utilities, extents of historic excavations and backfill, and land use of adjacent properties).

III. PROCEDURAL IMPEDIMENTS

Assembly Bill 358 requires that the owner or operator transmit additional information regarding an unauthorized release to the lead regulatory agency on a written form or using an electronic format developed by the State Water Board (the Underground Storage Tank (UST) Site – Unauthorized Release / Contamination Report). ACDEH's review of the Case file indicates that an unauthorized release report has not been submitted to ACDEH for the release associated with the Case.

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. Stakeholder Meeting **Compliance Date: September 3, 2018**

Please conduct a stakeholders meeting by the compliance date identified above to discuss the current status of the Site and the path towards closure of the Site under the LTCP. The identification of the path to closure for the Site should be based on the current CSM for the Site. Please come prepared with copies of figures and analytical data to support discussion of the path to closure.

2. ESI Compliance Submittals
Compliance Date: July 30, 2018

Please address the ESI compliance issues identified in *Section II* by the compliance date listed above.

3. Unauthorized Release Report
Compliance Date: July 30, 2018

Please submit an Unauthorized Release Report as discussed in *Section III* by the compliance date listed above.

V. 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)

Shane Olton, AECOM, Project Manager (sent via E-mail to: shane.olton@aecom.com)

ATTACHMENT A

LTCP Closure Criteria Evaluation Checklist

SHELL #129460 (T0600101226) - [MAP THIS SITE](#)

PUBLIC PAGE

15275 WASHINGTON
SAN LEANDRO, CA 94579
ALAMEDA COUNTY
LUST CLEANUP SITE ([INFO](#))

CLEANUP OVERSIGHT AGENCIES

ALAMEDA COUNTY LOP ([LEAD](#)) - CASE #: R00000372 - [JONATHAN E. SANDERS](#)
SAN FRANCISCO BAY RWQCB (REGION 2) - CASE #: 01-1331 - [Regional Water Board](#)

STATUS: OPEN - ASSESSMENT & INTERIM REMEDIAL ACTION

- Activities Report
- Documents / Data
- Environmental Conditions
- Admin
- Funding
- Case Reviews

THIS PROJECT WAS LAST MODIFIED BY [JONATHAN E. SANDERS](#) ON 6/29/2018 12:33:36 PM - [HISTORY](#)

CLOSURE POLICY

THIS VERSION IS FINAL AS OF 6/29/2018

CHECKLIST INITIATED ON 5/13/2013

[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?

Name of Water System :
EBMUD

YES NO

b. The unauthorized release consists only of petroleum ([info](#)).

YES NO

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

e. A conceptual site model that assesses the nature, extent, and mobility of the release has been developed ([info](#)).

Description (Check all that Apply):

- GW Not Evaluated
- Groundwater Assessment Incomplete - Areal Extent of Contamination Not Defined
- Groundwater Assessment Incomplete - Depth of Contamination Not Defined
- Hydrogeology Not Adequately Defined
- Potential Receptors Not Identified
- Soil Assessment Incomplete - Areal Extent Not Defined
- Soil Assessment Incomplete - Depth Unknown
- Soil Vapor Not Evaluated
- Other -

YES NO

f. Secondary source has been removed to the extent practicable ([info](#)).

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 -

Additional remediation may be necessary to satisfy media specific criteria. This determination will be based on a Site Specific Risk Assessment

YES NO

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](#)

YES

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

1.1 - The contaminant plume that exceeds water quality objectives is <100 feet in length. There is no free product. The nearest existing water supply well or surface water body is >250 feet from the defined plume boundary.

YES NO

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 O2 Data O2 < 4% O2 ≥ 4%

Benzene in Groundwater :

≥ 100 µg/l and < 1,000 µg/l ≥ 1,000 µg/l Unknown

Soil Gas Benzene :

≥ 85 µg/m³ and < 280 µg/m³ ≥ 280 µg/m³ and < 85,000 µg/m³ ≥ 85,000 µg/m³ and < 280,000 µg/m³ ≥ 280,000 µg/m³ Unknown

Soil Gas EthylBenzene :

≥ 1,100 µg/m³ and < 3,600 µg/m³ ≥ 3,600 µg/m³ and < 1,100,000 µg/m³ ≥ 1,100,000 µg/m³ and < 3,600,000 µg/m³ ≥ 3,600,000 µg/m³ Unknown

Soil Gas Naphthalene :

- $\geq 93 \mu\text{g}/\text{m}^3$ and $< 310 \mu\text{g}/\text{m}^3$ $\geq 310 \mu\text{g}/\text{m}^3$ and $< 93,000 \mu\text{g}/\text{m}^3$ $\geq 93,000 \mu\text{g}/\text{m}^3$ and $< 310,000 \mu\text{g}/\text{m}^3$ $\geq 310,000 \mu\text{g}/\text{m}^3$ 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 :

- $> 1.9 \text{ mg}/\text{kg}$ and $\leq 2.8 \text{ mg}/\text{kg}$ $> 2.8 \text{ mg}/\text{kg}$ and $\leq 8.2 \text{ mg}/\text{kg}$ $> 8.2 \text{ mg}/\text{kg}$ and $\leq 12 \text{ mg}/\text{kg}$ $> 12 \text{ mg}/\text{kg}$ and $\leq 14 \text{ mg}/\text{kg}$ $> 14 \text{ mg}/\text{kg}$ Unknown

Soil Concentrations of EthylBenzene :

- $> 21 \text{ mg}/\text{kg}$ and $\leq 32 \text{ mg}/\text{kg}$ $> 32 \text{ mg}/\text{kg}$ and $\leq 89 \text{ mg}/\text{kg}$ $> 89 \text{ mg}/\text{kg}$ and $\leq 134 \text{ mg}/\text{kg}$ $> 134 \text{ mg}/\text{kg}$ and $\leq 314 \text{ mg}/\text{kg}$ $> 314 \text{ mg}/\text{kg}$ Unknown

Soil Concentrations of Naphthalene :

- $> 9.7 \text{ mg}/\text{kg}$ and $\leq 45 \text{ mg}/\text{kg}$ $> 45 \text{ mg}/\text{kg}$ and $\leq 219 \text{ mg}/\text{kg}$ $> 219 \text{ mg}/\text{kg}$ Unknown

Soil Concentrations of PAH :

- $> 0.063 \text{ mg}/\text{kg}$ and $\leq 0.68 \text{ mg}/\text{kg}$ $> 0.68 \text{ mg}/\text{kg}$ and $\leq 4.5 \text{ mg}/\text{kg}$ $> 4.5 \text{ mg}/\text{kg}$ 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, 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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<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 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