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By Alameda County Environmental Health at 12:12 pm, Jul 14, 2014



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www.arcadis-us.com

Response to Comments to Well Destruction Report

Former BP Station No. 11133
2220 98th Avenue, Oakland, California ACEH Case
#RO0000403

ENVIRONMENT

"I declare that to the best of my knowledge at the present time, that the information and/or recommendations contained in the attached document are true and correct."

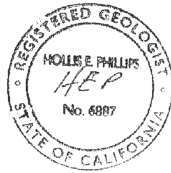
Date:
June 30, 2014

Submitted by:

Contact:
Hollis E. Phillips

ARCADIS U.S., Inc

Phone:
415.432.6903



Email:
Hollis.phillips@arcadis-us.com

Hollis E. Phillips, PG
Project Manager

Our ref:
GP09BPNA.C107

Dilan Roe
Program Manager - Land Use & Local Oversight Program
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502

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Subject:

Response to Comments on Well Destruction Report

Former BP Station No. 11133
2220 98th Avenue
Oakland, California
ACEH Case No. RO0000403

ENVIRONMENTAL

Mr. Roe:

This *Response to Comments on Well Destruction Report* was prepared to clarify discrepancies found in the *Well Destruction Report* submitted by ARCADIS U.S. Inc. (ARCADIS) on August 30, 2013 and as requested by your email received June 22, 2014 by Hollis Phillips of ARCADIS. Each of the below referenced historical reports can be found in Geotracker.

Date:
July 11, 2014

Contact:
Hollis E. Phillips

Phone:
415.432.6903

Comment #1

The text of the report states that nine remediation wells were destroyed including vapor wells VW-1, VW-2, VW-3, VEW-4, VEW-5, VEW-6, VEW-7, VEW-8, and VEW-9. The destruction of these nine wells is supported by Table 1 of the report and copies of Well Completion Reports filed with the Department of Water Resources. However, no discussion or documentation is provided in the report for the destruction of wells VEW-1, VEW-2, and VEW-3 even though permits were issued on August 8, 2013 from Alameda County Public Works for destruction of twelve vapor wells including wells VEW-1, VEW-2, and VEW-3.

Email:
hollis.phillips@arcadis-us.com

Our ref:
GP09BPNA.C107

Response #1

The following nine remediation wells were destroyed: VW-1, VW-2, VW-3, VEW-4, VEW-5, VEW-6, VEW-7, VEW-8, and VEW-9. VEW-1 through VEW-3 do not exist. They were accidentally assumed to exist by ARCADIS staff when setting up the well destructions and the Alameda County Public Works Agency (ACPWA) well destruction permits were applied for in error. VEW-4 through VEW-9 were installed and connected to VW-1 through VW-3, so the numerical order was consistent but the prefix was not.

ARCADIS worked with ACPWA to fix this discrepancy in the well destruction permits and the updated and accurate permits are included as Attachment 1.

Imagine the result

Comment #2

The text of the report states that 12 groundwater monitoring wells were destroyed including wells AW-1, AW-2, AW-3, AW-4, AW-5, AW-6, AW-7, AW-8, AW-9, MW-1, MW-2, and MW-3. The destruction of these twelve wells is supported by Table 1 of the report and copies of Well Completion Reports filed with the Department of Water Resources. However, the well destruction permit issued by Alameda County Public Works on August 8, 2013 included only 11 monitoring wells and did not include well AW-9.

Response #2

ARCADIS had 11 groundwater monitoring wells destroyed by pressure grouting during the destruction event and confirmed the previous destruction of AW-7, which occurred sometime in 2001.

Previous consultants were unable to locate AW-7 and considered it to be destroyed as referenced in Groundwater Monitoring Reports (GMRs) beginning in 2001 (see Table 1 and notes therein from GMRs starting in Second Quarter 2001). It was searched for over several events before being considered destroyed in 2002. Survey data for the wells consisted only of relative elevations changes measured between site wells for use in groundwater flow calculations (Alton Geosciences 1991 *Supplemental Site Investigation Study*), which does not provide information to the location of the missing AW-7. During the 2013 well destruction event a metal detector and shovel were used to thoroughly investigate the area surrounding the presumed location of AW-7, and as stated in the Well Destruction Report, it was not found.

The ACPWA permit accidentally listed only 11 wells in the well destruction permits. AW-9 was missed by the Environmental Compliance Specialist creating the permits. With the lack of AW-7 to destroy, the permits coincidentally contained the correct number of wells, though not the correct ones. Since the cost of the permits did not change, field notes were made by ARCADIS and the ACPWA inspector to reflect the change from AW-7 to AW-9 but the existing permits were not initially updated to reflect the change. The permits have now been corrected to include AW-9 and not AW-7, and are included as Attachment 1.

Comment #3

Additionally, please provide waste manifests for Investigation Derived Waste if generated during the well destructions.

Response #3

All the wells were pressure grouted per county standards so only metal well boxes and vault lids were accumulated. These were taken by National EWP Inc. for metal recycling. The minor groundwater that was collected when installing tremie pipe down-well to remove casing water prior to pressure grouting was reused to mix grout. No other remediation equipment/supplies, structures, or waste of any kind remains on-site.

If you have any questions or need additional information regarding this site please contact Hollis Phillips at 415.432.6903.

Sincerely,

ARCADIS U.S., Inc.

A handwritten signature in blue ink that reads "H.E. Phillips".

Hollis E. Phillips, PG (No. 6887)
Project Manager/Principal Geologist

Attachments

Attachment 1 – Corrected ACPWD Well Destruction Permits

Copies:

Geotracker upload/ACEH upload

Alameda County Public Works Agency - Water Resources Well Permit



Public Works Agency
—Alameda County—

399 Elmhurst Street
Hayward, CA 94544-1395
Telephone: (510)670-6633 Fax:(510)782-1939

Application Approved on: 08/08/2013 By jamesy

Permit Numbers: W2013-0556 to W2013-0568
Permits Valid from 08/19/2013 to 08/30/2013

Application Id: 1376001659189
Site Location: 2220 98th Ave
Project Start Date: 08/19/2013

City of Project Site:Oakland

Completion Date:08/30/2013

Assigned Inspector: Contact Steve Miller at (510) 670-5517 or stevem@acpwa.org

Applicant: ARCADIS - Rob Moniz
2999 Oak Rd, Suite 300, Walnut Creek, CA 94597

Phone: 925-296-7839

Property Owner: Atlantic Richfield Company- Paul Supple
P.O. Box 1257, San Ramon, CA 94583

Phone: 925-275-3801

Client: Atlantic Richfield Company- ARCO-C/O Rob

Phone: 510-409-3831 x

Moniz
4 Centerpoint Dr, 4-427, La Palma, CA 90623
Rob Moniz

Phone: --
Cell: 510-409-3831

Contact:

	Total Due:	\$4897.00	
Receipt Number: WR2013-0278	Total Amount Paid:	\$4897.00	
Payer Name : Arcadis	Paid By: CHECK		PAID IN FULL

Works Requesting Permits:

Well Destruction-Monitoring - 11 Wells

Driller: National EWP - Lic #: 953646 - Method: press

Work Total: \$4367.00

Specifications

Permit #	Issued Date	Expire Date	Owner Well Id	Hole Diam.	Casing Diam.	Seal Depth	Max. Depth	State Well #	Orig. Permit #	DWR #
W2013-0556	08/08/2013	11/17/2013	AW-1	10.00 in.	2.00 in.	16.00 ft	35.00 ft	2S/3W23B5	90277	Logs Only
W2013-0557	08/08/2013	11/17/2013	AW-2	10.00 in.	2.00 in.	16.00 ft	45.00 ft	2S/3W23B6	90277	Logs Only
W2013-0558	08/08/2013	11/17/2013	AW-3	10.00 in.	2.00 in.	16.00 ft	45.00 ft	2S/3W23B7	90277	Logs Only
W2013-0559	08/08/2013	11/17/2013	AW-4	10.00 in.	2.00 in.	16.00 ft	35.00 ft	2S/3W23B8	90277	Logs Only
W2013-0560	08/08/2013	11/17/2013	AW-5	10.00 in.	4.00 in.	17.00 ft	45.00 ft	No Records	No Records	No Records
W2013-0561	08/08/2013	11/17/2013	AW-6	10.00 in.	4.00 in.	17.00 ft	35.00 ft	No Records	No Records	No Records
W2013-0563	08/08/2013	11/17/2013	AW-8	8.00 in.	2.00 in.	17.00 ft	45.00 ft	No Records	No Records	No Records
W2013-0562	08/08/2013	11/17/2013	AW-9	8.00 in.	2.00 in.	17.00 ft	45.00 ft	No Records	No Records	No Records
W2013-0564	08/08/2013	11/17/2013	MW-1	8.00 in.	2.00 in.	9.00 ft	29.00 ft	2S/3W23B2	88156	Logs Only
W2013-0565	08/08/2013	11/17/2013	MW-2	8.00 in.	2.00 in.	10.00 ft	32.00 ft	2S/3W23B3	88156	Logs Only
W2013-0566	08/08/2013	11/17/2013	MW-3	8.00 in.	2.00 in.	11.50 ft	31.00 ft	2S/3W32B4	88156	Logs Only

Specific Work Permit Conditions

1. Drilling Permit(s) can be voided/ cancelled only in writing. It is the applicant's responsibility to notify Alameda County

Alameda County Public Works Agency - Water Resources Well Permit

Public Works Agency, Water Resources Section in writing for an extension or to cancel the drilling permit application. No drilling permit application(s) shall be extended beyond ninety (90) days from the original start date. Applicants may not cancel a drilling permit application after the completion date of the permit issued has passed.

2. Prior to any drilling activities, it shall be the applicant's responsibility to contact and coordinate an Underground Service Alert (USA), obtain encroachment permit(s), excavation permit(s) or any other permits or agreements required for that Federal, State, County or City, and follow all City or County Ordinances. No work shall begin until all the permits and requirements have been approved or obtained. It shall also be the applicants responsibilities to provide to the Cities or to Alameda County an Traffic Safety Plan for any lane closures or detours planned. No work shall begin until all the permits and requirements have been approved or obtained.
3. Compliance with the well-sealing specifications shall not exempt the well-sealing contractor from complying with appropriate State reporting-requirements related to well construction or destruction (Sections 13750 through 13755 (Division 7, Chapter 10, Article 3) of the California Water Code). Contractor must complete State DWR Form 188 and mail original to the Alameda County Public Works Agency, Water Resources Section, within 60 days. Include permit number and site map.
4. Applicant shall submit the copies of the approved encroachment permit to this office within 60 days.
5. Permittee shall assume entire responsibility for all activities and uses under this permit and shall indemnify, defend and save the Alameda County Public Works Agency, its officers, agents, and employees free and harmless from any and all expense, cost and liability in connection with or resulting from the exercise of this Permit including, but not limited to, property damage, personal injury and wrongful death.
6. Applicant shall contact Steve Miller for an inspection time at (510) 670-5517 or email to stevem@acpwa.org at least five (5) working days prior to starting, once the permit has been approved. Confirm the scheduled date(s) at least 24 hours prior to drilling.
7. Permittee, permittee's contractors, consultants or agents shall be responsible to assure that all material or waters generated during drilling, boring destruction, and/or other activities associated with this Permit will be safely handled, properly managed, and disposed of according to all applicable federal, state, and local statutes regulating such. In no case shall these materials and/or waters be allowed to enter, or potentially enter, on or off-site storm sewers, dry wells, or waterways or be allowed to move off the property where work is being completed.
8. Remove the Christy box or similar structure.

Destroy well by grouting neat cement with a tremie pipe or pressure grouting (25 psi for 5min.) to the bottom of the well and by filling with neat cement to three (3-5) feet below surface grade. Allow the sealing material to spill over the top of the casing to fill any annular space between casing and soil.

After the seal has set, backfill the remaining hole with concrete or compacted material to match existing conditions.
9. Copy of approved drilling permit must be on site at all times. Failure to present or show proof of the approved permit application on site shall result in a fine of \$500.00.

Alameda County Public Works Agency - Water Resources Well Permit

Specifications

Permit #	Issued Date	Expire Date	Owner Well Id	Hole Diam.	Casing Diam.	Seal Depth	Max. Depth	State Well #	Orig. Permit #	DWR #
W2013-0567	08/08/2013	11/17/2013	VEW-4	11.00 in.	2.00 in.	8.00 ft	16.60 ft	2S/3W23B	94407	456760
W2013-0567	08/08/2013	11/17/2013	VEW-5	11.00 in.	2.00 in.	8.00 ft	16.60 ft	2S/3W23B	94407	456760
W2013-0567	08/08/2013	11/17/2013	VEW-6	11.00 in.	2.00 in.	8.00 ft	16.60 ft	2S/3W23B	94407	456760
W2013-0567	08/08/2013	11/17/2013	VEW-7	11.00 in.	2.00 in.	8.00 ft	16.60 ft	2S/3W23B	94407	456760
W2013-0567	08/08/2013	11/17/2013	VEW-8	11.00 in.	2.00 in.	8.00 ft	16.60 ft	2S/3W23B	94407	456760
W2013-0567	08/08/2013	11/17/2013	VEW-9	11.00 in.	2.00 in.	8.00 ft	16.60 ft	2S/3W23B	94407	436656
W2013-0567	08/08/2013	11/17/2013	VW-1	11.00 in.	4.00 in.	8.00 ft	16.60 ft	2S/3W23C1 9	92136	383591
W2013-0567	08/08/2013	11/17/2013	VW-2	11.00 in.	4.00 in.	8.00 ft	16.60 ft	2S/3W23C2 0	92136	383593
W2013-0567	08/08/2013	11/17/2013	VW-3	11.00 in.	4.00 in.	8.00 ft	16.60 ft	2S/3W23C2 1	92136	383594

Specific Work Permit Conditions

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 2. Compliance with the well-sealing specifications shall not exempt the well-sealing contractor from complying with appropriate State reporting-requirements related to well construction or destruction (Sections 13750 through 13755 (Division 7, Chapter 10, Article 3) of the California Water Code). Contractor must complete State DWR Form 188 and mail original to the Alameda County Public Works Agency, Water Resources Section, within 60 days. Include permit number and site map.

 3. Applicant shall submit the copies of the approved encroachment permit to this office within 60 days.

 4. Applicant shall contact Steve Miller for an inspection time at (510) 670-5517 or email to stevem@acpwa.org at least five (5) working days prior to starting, once the permit has been approved. Confirm the scheduled date(s) at least 24 hours prior to drilling.

 5. Remove the Christy box or similar structure. Pressure Grout with Cement (Less than 30 ft in depth). After the seal has set, backfill the remaining hole with concrete or compacted material to match existing.

 6. Copy of approved drilling permit must be on site at all times. Failure to present or show proof of the approved permit application on site shall result in a fine of \$500.00.

 7. Prior to any drilling activities onto any public right-of-ways, it shall be the applicants responsibilities to contact and coordinate a Underground Service Alert (USA), obtain encroachment permit(s), excavation permit(s) or any other permits required for that City or to the County and follow all City or County Ordinances. It shall also be the applicants responsibilities to provide to the Cities or to Alameda County a Traffic Safety Plan for any lane closures or detours planned. No work shall begin until all the permits and requirements have been approved or obtained.
-

Alameda County Public Works Agency - Water Resources Well Permit

Remediation Well Destruction-Injection - 5 Wells

Driller: National EWP - Lic #: 34514 - Method: press

Work Total: \$265.00

Specifications

Permit #	Issued Date	Expire Date	Owner Well Id	Hole Diam.	Casing Diam.	Seal Depth	Max. Depth	State Well #	Orig. Permit #	DWR #
W2013-0568	08/08/2013	11/17/2013	IW-1	10.00 in.	4.00 in.	16.00 ft	40.00 ft	2S/3W23B	W2010-0635	e0117075
W2013-0568	08/08/2013	11/17/2013	IW-2	10.00 in.	4.00 in.	16.00 ft	40.00 ft	2S/3W23B	W2010-0635	e0117073
W2013-0568	08/08/2013	11/17/2013	IW-3	10.00 in.	4.00 in.	16.00 ft	40.00 ft	2S/3W23B	W2010-0635	e0117076
W2013-0568	08/08/2013	11/17/2013	OW-1	10.00 in.	2.00 in.	17.00 ft	40.00 ft	2S/3W23B	W2010-0636	e0117077
W2013-0568	08/08/2013	11/17/2013	RW-1	8.00 in.	6.00 in.	11.00 ft	40.00 ft	2S/3W23B	No Records	No Records

Specific Work Permit Conditions

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