



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
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November 19, 2014

Nicole Arceneaux
Chevron Environmental Management Company
6101 Bollinger Canyon Road
San Ramon, CA 94583

Ed Ralston
Phillips 66 Company
76 Broadway
Sacramento, CA 95818

(Sent via E-mail to:

nicole.arceneaux@Chevron.com)

(Sent via E-mail to: Ed.C.Ralston@p66.com)

Rajan Goswamy
4276 MacArthur Boulevard
Oakland, CA 94619

Carole Quick and Lorraine Mudgett
10214 SW Stuart Court
Portland, OR 97224-4304

(Sent via E-mail to: rajgoswamy@sbcglobal.net)

Subject: Case File Review for Fuel Leak Case No. RO0000409 and GeoTracker Global ID T0600102279, Unocal #1156, 4276 MacArthur Boulevard, Oakland, CA 94619

Dear Ms. Arceneaux, Mr. Ralston, Ms. Quick, Ms. Mudgett, and Mr. Goswamy:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site, including the documents entitled, "Report on Sub-Slab, Indoor Air, and Outdoor Air Sampling and Vapor Intrusion Evaluation for the Oakland Veterinary Hospital Located at 4258 MacArthur Boulevard, Oakland, California," dated July 21, 2014 (Vapor Intrusion Report) "Monitoring well Installation Report," dated July 25, 2014 (Monitoring Well Installation Report), and "Third Quarter 2014 Semiannual Groundwater Monitoring and Sampling Report," dated October 7, 2014 (Monitoring Report). Based on our review of the case file, we have the following technical comments. We request that you address the technical comments and submit the reports requested below.

TECHNICAL COMMENTS

- 1. Vapor Intrusion Evaluation.** The Vapor Intrusion Report indicates that the second late-summer sub-slab, indoor air, and outdoor air sampling event would be implemented to provide insight into sampling variability as requested in our January 27, 2014 correspondence. To date, we have not received the results of the late-summer sampling event. We request that you submit the results of the second sampling event in a Vapor Intrusion Evaluation Report no later than December 19, 2014.
- 2. Evaluation of Remedial Technologies.** The Monitoring Well Installation Report describes soil sampling and well installation results for shallow monitoring wells MW-10S and MW-11S. ACEH previously requested that site assessment activities be focused on evaluation of remedial technologies particularly to address the on-site and off-site contamination along the northwestern property boundary adjacent to the Oakland Veterinary Hospital. In our March 19, 2014 correspondence, ACEH conditionally approved the proposed well installation to keep the project moving forward but indicated that additional work will be required to evaluate remedial technologies. We also did not concur with the conclusion that multi-phase extraction (MPE) is likely not a feasible technology. We request that you conduct further evaluation including data collection and pilot testing to evaluate remedial technologies. Please submit a Work Plan to evaluate remedial technologies no later than January 31, 2015.

3. **Groundwater Sampling.** Groundwater monitoring is to be continued on a semiannual basis. Please present the results in the reports requested below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Jerry Wickham), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **December 19, 2014** – Vapor Intrusion Evaluation Report – Second Sampling Event
File to be named: SWI_R_yyyy-mm-dd RO409
- **January 31, 2015** – Work Plan to Evaluate Remedial Technologies
File to be named: WP_R_yyyy-mm-dd RO409
- **March 30, 2015** – Semi-Annual Groundwater Monitoring Report
File to be named: GWM_R_yyyy-mm-dd RO409

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.

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org. Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address does not appear on the cover page of this notification, ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Attachment: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

Responsible Parties
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cc: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 2032 (*Sent via E-mail to: lgriffin@oaklandnet.com*)

Maureen Dorsey, Oakland Veterinary Clinic, 4258 MacArthur Boulevard, Oakland, CA 94619

Chad Roper, AECOM, 1220 Avenida Acaso, Camarillo, CA 93012 (*Sent via E-mail to: chad.roper@aecom.com*)

Perry Pineda, Shell Oil Products US, 20945 S. Wilmington Ave., Carson, CA 90810-1039 (*Sent via E-mail to: perry.pineda@shell.com*)

Peter Schaefer, Conestoga-Rovers & Associates, 5900 Hollis Street, Suite A Emeryville, CA 94608 (*Sent via E-mail to: pschaefer@croworld.com*)

Jerry Wickham, ACEH (*Sent via E-mail to: jerry.wickham@acgov.org*)
GeoTracker, e-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/).

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.

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