



April 27, 2018

Ms. Hollis Phillips (Sent via e-mail to: hollis.phillips@arcadis.com)
Arcadis U.S. Inc.
100 Montgomery Street, Suite 300
San Francisco, CA 94104

Khalid and Romana Usman
3670 Ralston Avenue
Hillsborough, CA 94010-6734

Steve Mahoney
30 Northwest Street
Yerington, NV 89447

New ERA Energy LLC
405 Camille Circle, #11
San Jose, CA 95134-2497

Stalwart Venture LLC
39899 Balentine Drive #370
Newark, CA 94560-5381

Subject: Fuel Leak Case No. RO0000426 and GeoTracker Global BP #11109, 4280 Foothill Blvd,
Oakland, Geotracker Global ID T0600100217

Ladies and Gentlemen:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *Second and Third Quarter 2017 Semi-Annual Groundwater Monitoring Report* dated October 31, 2017 and the *Supplemental Site Evaluation Work Plan (Work Plan)* dated February 28, 2018 prepared by Arcadis on behalf of the Atlantic Richfield Company. Thank you for submitting the documents.

ACDEH has evaluated the data and recommendations presented in the Report in conjunction with the case files, and the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on ACDEH staff review, we have determined that the site does not meet the LTCP General Criteria d (Free Product Removal), General Criteria f (Secondary Source Removal), and Media-Specific Criteria for Groundwater. Based on ACDEH staff review of the case file and the referenced report ACDEH requests that you address the following technical comments and send us the document requested below.

The Work Plan is conditionally approved for implementation provided that all of the Technical Comments below are addressed and incorporated during the field implementation. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or the technical comment is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: karel.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. Soil Vapor Sample Collection from Soil Gas Probes:

- a. ACDEH requests confirmation analysis by EPA Method TO-17 of naphthalene for all collected soil gas samples due to the challenges using EPA Method TO-15, as described in Appendix E of DTSC's *Advisory Active Soil Gas Investigations* (July 2015).

- b. As previously performed and to maintain consistency with DTSC's *Advisory Active Soil Gas Investigations* (July 2015), please analyze each soil vapor samples for oxygen, methane, carbon dioxide, and helium, the chosen tracer gas and include the results as percentages in the summary table of soil gas analytical results. Please provide a summary table of all historic soil vapor analytical results.
- c. Please also document the tracer gas concentration in the required shroud to determine the presence of a leak of atmospheric gases into the vapor sample.

REVISED TECHNICAL REPORT REQUEST:

- **July 13, 2018:** Soil, Soil Vapor, and Groundwater Investigation Report
File to be named: RO426_SWI_R_yyyy-mm-dd
- **September 21, 2018:** ~~February 28, 2018~~ ~~September 22, 2017~~ E-mailed *Draft Corrective Action Plan Addendum and Updated SCM* to: karel.detterman@acgov.org

This report is 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.

Should you have any questions, please contact me at (510) 567-6708 or send me an electronic mail message at karel.detterman@acgov.org

Sincerely,

Karel Detterman, PG
Senior Hazardous Materials Specialist

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

cc: Charles Carmel, Remediation Manager Services Company, an Affiliate of Atlantic Richfield Company, 4 Centerpointe Drive Suite 200 Room LPR 4-222, La Palma, CA 90623 (Sent via E-mail to: charles.carmel@bp.com)

Ed Ralston, Conoco Phillips, 76 Broadway Street, Sacramento, CA 95818 (Sent via E-mail to: Ed.C.Ralston@p66.com)

Karel Detterman, ACDEH, (Sent via E-mail to: karel.detterman@acgov.org)
Dilan Roe, ACDEH, (Sent via E-mail to: dilan.roe@acgov.org)
Paresh Khatri, ACDEH, (Sent via E-mail to: paresh.khatri@acgov.org)
Electronic File, GeoTracker

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.