

ALAMEDA COUNTY
HEALTH CARE SERVICE
AGENCY
COLLEEN CHAWLA, Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY, SUITE 250
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

October 8, 2018

Ms. Megan Smoley (Sent via e-mail to: Megan.Smoley@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 *Fourth Quarter 2017 and First Quarter 2018 Semi-Annual Groundwater Monitoring Report* dated May 13, 2018 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), Media-Specific Criteria for Groundwater, and Media-Specific Vapor Intrusion to Indoor Air for off-site receptors. 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 was conditionally approved in the April 27, 2018 Directive Letter, however, on June 4, 2018 and October 2, 2018, ACDEH received e-mails from Arcadis, the consultant of record, updating ACDEH of proposed new soil boring locations due to City of Oakland restrictions concerning the prohibition of invasive work within 100 feet of the intersection of High Street and Foothill Boulevard. ACDEH approves of the soil boring locations shown on Attachment A, Figure 1 and Table 1. ACDEH is also pleased to learn that an access agreement was obtained from the church at 1941 High Street for the placement of a permanent soil vapor probe (SV-01), adjacent to the former and current UST location.

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 technical comments provided in ACDEH's April 27, 2018 Directive Letter, 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.

REVISED TECHNICAL REPORT REQUEST:

- **December 10, 2018 ~~July 13, 2018~~**: Soil, Soil Vapor, and Groundwater Investigation Report
File to be named: RO426_SWI_R_yyyy-mm-dd
- **December 21, 2018 ~~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 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. 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

Attachment A: Table 1, *Proposed Soil Boring Relocations* and Figure 1, *Site Vicinity Map with Proposed Sample Locations*

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)

Jamey Peterson, Arcadis, 100 Smith Ranch Road, Ste.329, San Rafael, CA 94903 (Sent via E-mail to: jamey.peterson@arcadis.com)

Bo Jessup, Arcadis (Sent via E-mail to: barbara.jessup@arcadis.com)

Carl Edwards, Arcadis (Sent via E-mail to: carl.edwards@arcadis.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.

ATTACHMENT A

Table 1
Proposed Soil Boring Relocations
CA-11109
4280 Foothill Boulevard
Oakland, California

Soil Boring ID	Original Purpose	Original Location	New Location	Reason for New Location
SB-01	Delineation around B-5	no change	no change	--
SB-02	Delineation around B-5	Foothill Blvd	site driveway at Foothill Blvd	City will not approve work within 100 ft of intersection
SB-03	Delineation at PG&E trench	High Street	site driveway at High Street	City will not approve work within 100 ft of intersection
SB-04	Delineation at PG&E trench	High Street	site driveway at High Street	City will not approve work within 100 ft of intersection
SB-05	Delineation at south corner of site	Foothill Blvd Cross Walk	across the street in the sidewalk (near the Chevron site)	City will not approve work within 100 ft of intersection
SB-06	Preferential Pathway Study	Foothill Blvd	100 feet south of intersection in Foothill Blvd	City will not approve work within 100 ft of intersection
SB-07	Preferential Pathway Study	High Street	100 feet south of intersection in Foothill Blvd	City will not approve work within 100 ft of intersection



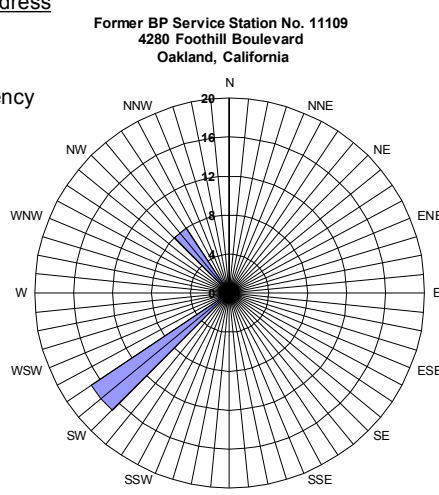
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

LEGEND:

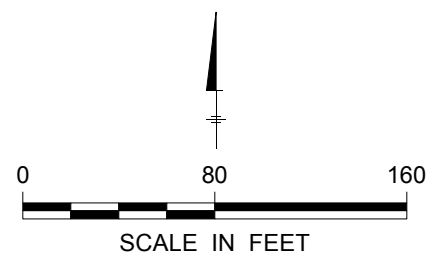
- ▲ Proposed Delineation Soil Boring
- ▲ Proposed Preferential Pathway Soil Boring
- ⊠ Proposed Soil Vapor Probe
- ⊕ Monitoring Well
- ⊕ Monitoring Well Chevron
- Recovery Point
- ⊕ CPT/UVOST Boring
- Soil Boring
- Sewer Line Below Water Table
- PG&E Utility Trench
- Site
- ▨ Chevron Service Station 90076 (4265 Foothill Boulevard)
- ▨ Former Shell Service Station (4411 Foothill Boulevard)
- Primary Regulator and Monitor
- ▨ PG&E Utility Vault

- Property Use/ APN/ Address**
- ▨ Residential
 - ▨ Commercial
 - ▨ Exempt Public Agency
 - ▨ Church

Groundwater Flow Direction Rose Diagram



Historical Groundwater Flow Direction 2006 through 2017



FORMER BP STATION #11109
 4280 FOOTHILL BOULEVARD
 OAKLAND, CALIFORNIA

SITE VICINITY MAP WITH PROPOSED SAMPLE LOCATIONS



FIGURE

1

*Property Use source: Alameda County Assessor's Office
 Property Assessment Information App: <http://www.acgov.org/ms/prop/2/9/2018>