



March 16, 2017

Mr. Kyle Waldron
Tesoro Petroleum Companies, Inc.
3450 S. 344th Way, Ste. 100
Auburn, WA 98001-5931
(Sent via E-mail to: kyle.a.waldron@tsocorp.com)

Mr. Chuck Miller
Moller Investment Group
6951 Collins Drive, Suite E-11
Moorpark, CA 93021
(Sent via E-mail to: chuck.miller@danskinvestments.com)

Mr. Joe Aldridge
Valero Energy Corporation
685 W. 3rd Street
Hanford, CA 93230

Subject: February 1, 2017 Meeting Summary and Requested Deliverables - Fuel Leak Case No. RO0000434 and GeoTracker Global ID T0600101410, Beacon #3604, 1619 First Street, Livermore, CA 94550

Dear Mr. Waldron, Mr. Miller, and Mr. Aldridge:

Alameda County Department of Environmental Health (ACDEH) met with Kyle Waldron (Tesoro Petroleum Companies, Inc. - Tesoro); Mike Purchase, Scott Stromberg, Emily Chow (Arctos Environmental - Artos); Dilan Roe and Kit Soo (Alameda County Department of Environmental Health, ACDEH) on February 1, 2017. The purpose of the meeting was for Arctos to present details of their *DRAFT Remedial Action Plan* (Draft RAP) which was prepared on behalf of Tesoro, and to discuss ACDEH's comments to the RAP.

ACDEH has also reviewed the RAP, and the *First and Second Quarters Status Report* (1Q & 2Q 2016 Reports), dated August 19, 2016, prepared by Arctos on behalf of Tesoro. The Draft RAP summarizes historical and current site conditions, identifies potential data gaps, establishes remedial goals, and evaluates the path forward for the site. The 1Q & 2Q Reports summarize groundwater monitoring activities in March and May 2016 completed during the first and second quarters in 2016 at the site.

Based on our review of the above-mentioned reports and our discussions during the February 1, 2017 meeting, ACDEH request that you address the technical comments listed below.

TECHNICAL COMMENTS

- Data Gap Investigation - Additional Investigation to Delineate the Downgradient Extent of the Dissolved-Phase Plume
 - As referenced in the Draft RAP, please move forward with the preparation of a work plan for this data gap investigation. Please include an assessment of your current monitoring well network in reference to the proposed field work and boring locations, as discussed during the February 1, 2017 meeting.

- Assessment of light non-aqueous phase liquid (LNAPL) in terms of mobility, fate and transport

- It is our understanding that LNAPL in the source area (in and in the vicinity of DW-8) is present at depth, at a depth interval of approximately 50 to 60 feet below ground surface (bgs). Based on the large amount of groundwater elevation and groundwater quality data available for this site, knowledge of large fluctuations in groundwater elevations from each quarter to the next in the last 20 years are likely due to regional natural and pumping influences, please provide a proposed method or scope of work to evaluate the mobility and potential recovery of LNAPL present within the sand and silty sand, as well as within the lower permeability cemented sands/silty sands at depth. Please include the proposed scope of work in the Data Gap Investigation Work Plan.
- Once the data gap investigation and LNAPL evaluation are complete, a meeting with ACDEH to discuss the findings and results will be performed prior to its inclusion into the draft RAP. Note that a different deliverable instead of the RAP is possible in the event that a RAP is deemed unnecessary, based on the new information.

Submittal Acknowledgement Statement

Please note that ACDEH has updated its Attachment 1 with regards to report submittals to ACDEH. ACDEH will now be requiring a Submittal Acknowledgement Statement, replacing the Perjury Statement, as a cover letter signed by the Responsible Party (RP). The language for the Submittal Acknowledgement Statement is as follows:

"I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the State Water Resources Control Board's GeoTracker website."

Note this change to your submittals to ACDEH.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH ftp site (Attention: Kit Soo), and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below, according to the following schedule.

- April 27, 2017 – Data Gap Investigation Work Plan:
File to be named: RO0434 WP_R_YYYY-MM-DD
- End of June 2017 – Meeting to discuss the findings of the Data Gap Investigation and LNAPL evaluation. The following are our availability, please let us know whether any of the dates and times will work for you:
 - June 26, 2017 – 10 am - 12 pm
 - June 28, 2017 – 10 am - 12 pm
 - June 29, 2017 – 10 am – 12 pm

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.

Mr. Waldron, Mr. Miller, and Mr. Aldridge
RO0000434
March 16, 2017
Page 3

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.
Thank you for your cooperation. If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at kit.soo@acgov.org.

Sincerely,

Kit Soo, PG 8957
Senior Hazardous Materials Specialist

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

cc: Michael Purchase, Arctos Environmental, 2332 5th Street, Suite A, Berkeley, CA 94702
(Sent via E-mail to: mpurchase@orionenv.com)

Scott Stromberg, Arctos Environmental, 2332 5th Street, Suite A, Berkeley, CA 94702
(Sent via E-mail to: sstromberg@orionenv.com)

Dilan Roe, ACDEH (Sent via E-mail to: dilan.roe@acgov.org)
Paresh Khatri, ACDEH (Sent via E-mail to: paresh.khatri@acgov.org)
Kit Soo, ACDEH (Sent via E-mail to: kit.soo@acgov.org)

GeoTracker, eFile

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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) 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 File Transfer Protocol (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 SCP 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 (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/) for more information on these requirements.

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 ACDEH's FTP server and the SWRCB's GeoTracker website." 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 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. 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 case meet this requirement. 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

Please note that delays in investigation, late 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 SCP)	REVISION DATE: December 1, 2016
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) 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) Open File Explorer using the Windows  key + E keyboard shortcut.
 - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) On the address bar, type in ftp://alcoftp1.acgov.org.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
 - d) Click Log On.
 - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - f) 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.