



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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December 5, 2013

BJP ROF Jordan Ranch LLC
c/o Ravi Nandwana
5000 Hopyard Road #170
Pleasanton, CA 94588-3349
(Sent via E-mail to: Ravi@missionvalleyhomes.org)

First American Title Guaranty Company ETAL
c/o Dolores Jordan and Curtis Williams
537 Grove Way
Castro Valley, CA 94541-2503

Subject: Case File Review for SLIC Case No. RO0002918 and GeoTracker Global ID T06019797353, Jordan Ranch, 4233 Fallon Road, Dublin, CA 94568

Dear Mr. Nandwana, Ms. Jordan, and Mr. Curtis:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above-referenced site including the document entitled, "*Updated Site Conceptual Model, Jordan Ranch Parcel H, Dublin, California,*" dated April 24, 2013 (Updated SCM). The Updated SCM, which was prepared on your behalf by ENGEO Incorporated, presents results from site investigation and cleanup activities and evaluates potential data gaps for the site.

We also reviewed a proposal received by email to install two sets of monitoring wells. In correspondence dated November 7, 2013, ACEH approved the well installation as proposed. We request that you present the results in the Monitoring Well Installation and Groundwater Sampling Report requested below.

The Updated SCM indicates that development plans for Parcel H have not been finalized. A preliminary plan in the case file indicates that residential housing could be constructed in the area of the former tank pit. Due to the potential for housing to be constructed in a fuel leak source area, the tank pit area is an area of particular concern. Technical comments 2 through 5 discuss several of the issues regarding the tank pit area. We request that you address these technical comments in the Soil Vapor Probe Installation and Sampling Plan requested below.

TECHNICAL COMMENTS

1. **Plume Delineation.** The proposal to install two sets of monitoring wells to delineate a plume extending south towards the stormwater detention basin and to delineate the plume extending southeast towards the pond is acceptable and was approved by ACEH in email correspondence dated November 7, 2013. Please present the well installation data and groundwater sampling results for the newly installed and existing wells in the Monitoring Well Installation and Groundwater Sampling Report requested below.

2. **Tank Pit Backfill.** We request clarification regarding backfilling of the tank pit following the 2011 remedial excavation. The Updated SCM indicates that drain rock was placed in the excavation from 11 to 25 feet bgs and that stockpiled soil was used for backfill from 0 to 11 feet bgs. The "*Addendum to Soil and Groundwater Remediation Status Report*," dated May 22, 2012 indicates that 42 tons of soil was disposed off-site at Hay Road Landfill. However, if drain rock filled approximately 56% (14 feet) of the excavation, then approximately 56% of the excavated soil would need to have been disposed elsewhere. We request clarification regarding the following:
- Please describe the volumes and locations where soil from the non-impacted stockpile and the treated stockpile were used as backfill in the excavated tank pit.
 - Please describe which soil was used to backfill the excavation from 0 to 5 feet.
 - Please indicate what was done with excess soil from the stockpiles that could not fit in the excavation due to the placement of drain rock.

We request that you address this tank pit backfill comment in a separate section of the Soil Vapor Probe Installation and Sampling Plan requested below.

3. **Contamination Outside Tank Pit.** Soil borings B-1 through B-11 were advanced around the perimeter of the tank pit in August 2012. Based on the results of these borings, the Updated SCM indicates that sidewall impacts generally extend less than 5 feet beyond the excavation sidewalls. However, the upper eight feet of Borings B-1 through B-11 were not logged. Boring B-7 did not have any recovery until a depth of 12 feet bgs. Sidewall samples from the tank pit excavation conducted in 2011 were collected from a depth of 8 feet bgs. Logging, screening, and/or sampling of the upper eight feet in borings B-1 through B-9 would have provided data on whether a bioattenuation zone is present and whether there is a potential for direct exposure to contaminated soil within this area. Review of the boring log for boring B-9 indicates that a strong odor was observed in the first soil layer encountered eight feet bgs. Since no soil samples were logged above the odorous layer, the upper vertical extent of contamination is not known. Odorous soil was not observed in borings B-8 and B-10, which are step out borings from Boring B-9. However, no soil samples were collected from the upper eight feet in borings B-8 and B-10 to confirm that shallow soil contamination is not present. The lack of shallow soil data and lack of information from the tank removal represents an uncertainty and potential data gap regarding the presence or absence of shallow soil contamination in the area surrounding the former tank pit.
4. **Soil Vapor Sampling Results.** Four permanent soil vapor probes were installed in June 2012 in the area of the former tank pit. Two of the soil vapor probes are within the tank pit (SG-1 and SG-2), one probe is approximately 20 feet southwest of the tank pit (SG-3), and one probe is approximately 20 feet southeast of the tank pit (SG-4). To date, the soil vapor probes have been sampled three times. During the first round of soil vapor sampling in June 2012, benzene was detected in soil vapor from SG-3 at a concentration of 94 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), which exceeds the Environmental Screening Level for residential land use of 42 $\mu\text{g}/\text{m}^3$. Benzene was not detected at concentrations above the reporting limit in soil vapor samples collected from SG-3 in October 2012 and February 2013. Soil vapor probe SG-3 is adjacent to boring NG-3. Benzene was detected in a grab groundwater sample from boring NG-3 at a concentration of 6,300 micrograms per liter ($\mu\text{g}/\text{L}$). Benzene was detected in a grab groundwater sample from boring NG-2 (located directly south of the former USTs) at a concentration of 16,300 micrograms per liter ($\mu\text{g}/\text{L}$). No soil vapor probes are located directly south of the former UST in the area of boring NG-2. The lack of soil vapor samples

directly south (downgradient) of the former UST where the highest concentrations of petroleum hydrocarbons have been detected in soil and groundwater represents a data gap.

5. **Future Soil Vapor Sampling.** In order to address the items described in technical comments 3 and 4, we request that you install two additional soil vapor probes. We request that one soil vapor probe be installed south of the former tank pit between borings B-25 and NG-2. We also request that one soil vapor probe be installed near boring B-7, west of the former dispenser. Please submit a brief Soil Vapor Probe Installation and Sampling Plan to complete this work. The Soil Vapor Probe Installation and Sampling Plan should include plans to collect soil samples from the probe borings at two depths in the upper five feet to meet criteria in the Low-threat Closure Policy and should include plans to sample existing soil vapor probes.
6. **Well Construction Table.** Please provide a table of well construction details for all monitoring wells installed at the site in the Monitoring Well Installation and Sampling Report 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:

- **January 19, 2014** – Soil Vapor Probe Installation and Sampling Plan
File to be named: WP_R_yyyy-mm-dd RO2918
- **April 4, 2014** – Monitoring Well Installation and Sampling Report
File to be named: SWI_R_yyyy-mm-dd RO2918

If you have any questions, please call me at (510) 567-6721 or send me an electronic mail message at donna.drogos@acgov.org. Case files can be reviewed online 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

Responsible Parties
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cc: Colleen Winey (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551
(Sent via E-mail to: cwiney@zone7water.com)

Scott Menard, Arbor Development Group, LLC, 3650 Mount Diablo Blvd., Suite 200, Lafayette, CA 94549 (Sent via E-mail to: smenard@arbordevelopmentgroup.com)

Jeff Adams, Engeo, Incorporated, 2010 Crow Canyon Place, Suite 250, San Ramon, CA 94583
(Sent via E-mail to: jaa@engeo.com)

Shawn Munger, Engeo, Incorporated, 2010 Crow Canyon Place, Suite 250, San Ramon, CA 94583
(Sent via E-mail to: smunger@engeo.com)

Dilan Roe, ACEH (Sent via E-mail to: dilan.roe@acgov.org)
Jerry Wickham, ACEH (Sent via E-mail to: jerry.wickham@acgov.org)

GeoTracker, eFile

Attachment 1

Responsible Party(ies) Legal Requirements/Obligations

REPORT/DATA REQUESTS

These reports/data are being requested pursuant to Division 7 of the California Water Code (Water Quality), Chapter 6.7 of Division 20 of the California Health and Safety Code (Underground Storage of Hazardous Substances), and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations (Underground Storage Tank Regulations).

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (Local Oversight Program [LOP] for unauthorized releases from petroleum Underground Storage Tanks [USTs], and Site Cleanup Program [SCP] for unauthorized releases of non-petroleum hazardous substances) require submission of reports in electronic format pursuant to Chapter 3 of Division 7, Sections 13195 and 13197.5 of the California Water Code, and Chapter 30, Articles 1 and 2, Sections 3890 to 3895 of Division 3 of Title 23 of the California Code of Regulations (23 CCR). Instructions for submission of electronic documents to the ACEH FTP site are provided on the attached "Electronic Report Upload Instructions."

Submission of reports to the ACEH FTP site is in addition to requirements for electronic submittal of information (ESI) to the State Water Resources Control Board's (SWRCB) Geotracker website. In April 2001, the SWRCB adopted 23 CCR, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1 (Electronic Submission of Laboratory Data for UST Reports). Article 12 required electronic submittal of analytical laboratory data submitted in a report to a regulatory agency (effective September 1, 2001), and surveyed locations (latitude, longitude and elevation) of groundwater monitoring wells (effective January 1, 2002) in Electronic Deliverable Format (EDF) to Geotracker. Article 12 was subsequently repealed in 2004 and replaced with Article 30 (Electronic Submittal of Information) which expanded the ESI requirements to include electronic submittal of any report or data required by a regulatory agency from a cleanup site. The expanded ESI submittal requirements for petroleum UST sites subject to the requirements of 23 CCR, Division, 3, Chapter 16, Article 11, became effective December 16, 2004. All other electronic submittals required pursuant to Chapter 30 became effective January 1, 2005. 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, 7835, 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, 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: July 25, 2012
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (petroleum UST 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 .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 <://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 .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.