



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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Alameda, CA 94502-6577  
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February 4, 2014

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

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

Subject: Conditional Work Plan Approval 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. Williams:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above-referenced site including the recently submitted documents entitled, "*Workplan for Soil Gas Well Installation and Sampling*," dated January 15, 2014 (Work Plan) and "*Fourth Quarter 2013 Groundwater Monitoring Report*," dated January 8, 2014 (Monitoring Report). The Monitoring Report presents results from groundwater sampling conducted on November 22, 2013. The Work Plan proposes the installation of two additional soil vapor probes and the sampling of the two new and four existing soil vapor probes.

The proposed scope of work for soil vapor probe installation and sampling in the "*Workplan for Soil Gas Well Installation and Sampling*," dated January 15, 2014, is conditionally approved and may be implemented provided that the technical comments below are incorporated during the site investigation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

### **TECHNICAL COMMENTS**

1. **Equilibration Time.** We request that the equilibration time between soil vapor well installation and purging and sampling be increased to 48 hours. We do not believe that two hours is sufficient equilibration time for well installation within the proposed 3-inch diameter borings.
2. **Purge Volumes.** Based on the results of previous purge volume testing at the site, we request that the pure volume be reduced to one purge volume for both existing and new soil vapor wells.
3. **Soil Gas Analytes.** The soil vapor samples are to be analyzed using EPA Method TO-15 rather TO-17 as indicated in the Work Plan. We request that all soil vapor samples also be analyzed for methane, carbon dioxide, and oxygen using ASTM D1946. Please present the results in the Soil Vapor Well Installation and Sampling Report requested below.

4. **Soil Vapor Sampling Logs.** In the Soil Vapor Well Installation and Sampling Report requested below, please include sampling logs for each soil vapor well sampled.
5. **Tank Pit Backfill Comment.** The response to comment 2 in the Work Plan indicates that the soil excavated from the tank pit in 2011 and treated by bioaugmentation was left in place. We note that the "*Addendum to Soil and Groundwater Remediation Status Report*," dated May 22, 2012 includes a statement regarding reuse of the petroleum impacted soil that includes several conditions for placement of the soil (see attached). The conditions for reuse of these stockpiled soils will need to be addressed prior to case closure.
6. **Groundwater Monitoring.** Please present results from the proposed quarterly groundwater sampling in the groundwater monitoring 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:

- **April 14, 2014** – Groundwater Monitoring Report – First Quarter 2014  
File to be named: GWM\_R\_YYYY-mm-dd RO2918
- **May 23, 2014** – Soil Vapor Well Installation and Sampling Report  
File to be named: SWI\_R\_YYYY-mm-dd RO2918
- **July 14, 2014** – Groundwater Monitoring Report – Second Quarter 2014  
File to be named: GWM\_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](mailto: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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Attachments: Owner's Soil Reuse Statement from May 22, 2012 Remediation Status Report Addendum  
Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

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

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

GeoTracker, eFile

May 21, 2012

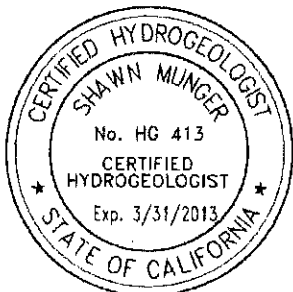
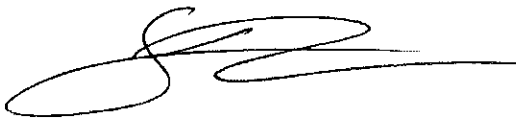
Owner's Soil Reuse Statement

The 420 cubic yards of petroleum impacted hydrocarbon soil (PHIS) proposed for reuse meets the definition of inert waste based on characterization and comparison to Tier 1 limits in accordance with the Region 2 Technical Reference Document, Characterization and Reuse of Petroleum Hydrocarbon Impacted Soil and Inert Waste, October 20, 2006. The PHIS will be buried at least three feet beneath the ground surface, at least five feet above the groundwater table, at least 100 feet from a surface water body, not within a floodplain, and will be protected against erosion.

Submitted by Responsible Party:



ROBERT RADONOVICH  
BJP-ROF Jordan Ranch, LLC  
5000 Hopyard Road, #170  
Pleasanton, CA 94588



## 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/](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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> July 25, 2012
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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](mailto:.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](mailto:.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.