



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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August 7, 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)

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 SCP 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 Site Cleanup Plan (SCP) case file for the above-referenced site including the recently submitted documents entitled, "*Soil Gas Sampling Report – Fourth Round*," dated May 30, 2014 (Soil Gas Sampling Report), "*Second Quarter 2014 Groundwater Monitoring Report*," dated July 15, 2014 (Monitoring Report), and "*Updated Soil Removal Work Plan*," dated July 28, 2014 (Work Plan). The Soil Gas Sampling Report presents results from soil gas sampling conducted on March 13, 2014 and April 22, 2014. The Monitoring Report presents results from groundwater sampling conducted on June 18, 2014 and includes a request for case closure. The Work Plan presents plans to excavate shallow soil in the area of previous soil sample BARN SS-7.

This case cannot be considered for closure until the two activities discussed in Technical Comments 2 and 3 are completed. We request that you complete the activities discussed in Technical Comments 2 and 3 and send us the reports requested below in order for this case to be considered for case closure.

TECHNICAL COMMENTS

- 1. Groundwater Monitoring.** Groundwater monitoring may be discontinued at this time pending the results of further evaluation at the time of case closure review.
- 2. Shallow Soil Removal Action for Toxaphene Contamination in Area of BARN SS-7.** The "*Updated Soil Removal Work Plan*," dated July 28, 2014 proposes excavation of shallow soil in the area of sampling location Barn SS-7 to remove soil with an elevated concentration of toxaphene. The proposed scope of work is acceptable and may be implemented as proposed. Please present the results of the excavation and confirmation soil sampling in the Soil Removal Action Report requested below.

3. **Soil Vapor Sampling Results.** Soil vapor samples were collected from four existing soil vapor probes (SG-1 through SG-4) and two newly installed soil vapor probes (SG-5 and SG-6) in March and April 2014. Existing soil vapor probes SG-1 through SG-4 have now been sampled four times between June 2012 and March 2014. Sampling results for each of the probes show some variability between sampling events. Soil vapor probes SG-5 and SG-6 have only been sampled once. The April 22, 2014 sample from SG-6 contained benzene at a concentration of 50 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), which exceeds the Environmental Screening Level (San Francisco Bay Regional Water Quality Control Board December 2013) for residential land use of $42 \mu\text{g}/\text{m}^3$. In order to assess the sampling variability and whether benzene concentrations in soil vapor in the area of SG-6 exceed ESLs, we request that you conduct one additional soil vapor sampling event for newly installed probes SG-5 and SG-6 using the established sampling and analytical methods from the March 2014 sampling event. Please present the sampling results in the Soil Vapor Sampling Report requested below.

4. **Environmental Screening Levels.** Please check the values for Environmental Screening Levels (ESLs) cited in future documents. We note that the ESL for benzene in soil vapor for residential land use is $42 \mu\text{g}/\text{m}^3$ but is referenced as both 42 and 84 on Figure 2 in the *“Soil Gas Sampling Report – Fourth Round,”* dated May 30, 2014. The ESL for Total Petroleum Hydrocarbons as gasoline for residential land use is $300,000 \mu\text{g}/\text{m}^3$ but is referenced as $370,000 \mu\text{g}/\text{m}^3$ on Table 1 and Figure 2 in the Soil Gas Sampling Report.

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:

- **October 17, 2014** – Soil Vapor Sampling Report
File to be named: SWI_R_YYYY-mm-dd RO2918

- **November 7, 2014** – Soil Removal Action Report
File to be named: EX_R_YYYY-mm-dd RO2918

Responsible Parties
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If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@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

Attachments: 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)

Morgan Johnson, Engeo, Incorporated, 2213 Plaza Drive, Rocklin, CA 95765 (Sent via E-mail to: mjohnson@engeo.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 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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) 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 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 Spills, Leaks, Investigations, and Cleanup (SLIC) 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 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, 6835, 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, later 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 SLIC)	REVISION DATE: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) 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) Using Internet Explorer (IE4+), go to <ftp://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 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.