



August 2, 2018

Ms. Carryl MacLeod (*Sent via E-mail to: [cmacleod@chevron.com](mailto:cmacleod@chevron.com)*)  
Chevron Environmental Management Company  
6101 Bollinger Canyon Road  
San Ramon, CA 94583

Mr. Eric Uranga (*Sent via E-mail to: [ejuranga@cityoflivermore.net](mailto:ejuranga@cityoflivermore.net)*)  
City of Livermore Economic Development  
1052 S. Livermore Ave.  
Livermore, CA 94550

Subject: Alameda County Response to Comments and Conditional Approval for *Lead Remedial Action Plan and Implementation* and *Soil and Groundwater Management Plan* for Site Cleanup Case No. RO0003255 and GeoTracker Global ID T10000010536, Livermorium Plaza – Mills Square Park Redevelopment, 2259 1st Street, Livermore, CA 94550

Dear Ms. MacLeod and Mr. Uranga:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file in conjunction with the following documents prepared by Arcadis U.S. Inc. (Arcadis) on behalf of Chevron Environmental Management Company (CEMC):

- *Remedial Action Implementation - Lead* (Lead RAP) dated March 2, 2018;
- *Soil and Groundwater Management Plan* (SGMP), dated July 27, 2018; and

ACDEH held a project meeting on April 23, 2018 with representatives from ACDEH, the City of Livermore (the City), CEMC and Arcadis to discuss the baseline project schedule regarding remediation activities at the subject site under two regulatory oversight programs including State Water Resources Control Board Leaking Underground Storage Tank (Case No. RO0003255) and Site Cleanup Program (Case No. RO0002908). Remediation of the lead impacted soil (RO0002908) will be conducted in accordance with the Lead RAP approved for public comment by ACDEH via email on March 5, 2018. A fact sheet for public comments regarding the Lead RAP was issued by ACDEH on April 25, 2018. Public comment period for the Lead RAP will close on May 25, 2018.

Subsequent to ACDEH's meeting, response to comments were provided by both the City and CEMC regarding the Lead RAP. In a letter dated April 26, 2018, the City's environmental consultant, Pangea Environmental Services, Inc. (Pangea), provided a document titled *Comments on Lead RAP Implementation*. Comments from this document consisted of (1) recommendations to revise the extent of soil excavation and methodology for waste profiling based on additional delineation sampling, and (2) a cost estimate for implementation of the soil excavation. In a letter dated May 4, 2018, CEMC's environmental consultant Arcadis U.S., Inc (Arcadis) provided a response to comments in a document titled *Reponses to Comments on Lead RAP Implementation*. CEMC's response to comments consisted of (1) agreement to potentially modify the extent of soil excavation (2) disagreement of the sampling methodology for waste profiling based on additional delineation sampling, and (3) disagreement on the timing of the RAP implementation.

Based on ACDEH's file review and conversations held during a series of meetings over the last few months, ACDEH conditionally approves implementation of the Lead RAP and SGMP provided that the *Deliverables* below are incorporated. Additionally, ACDEH has provided a response to comments to both the City and CEMC letters. We request that you address the *Technical Comments* and update the Lead RAP before uploading the document to the State Water Board's GeoTracker website.

### **TECHNICAL COMMENTS**

1. **Comment #1** – ACDEH agrees with the expanded excavation provided that excavation activities encompass the area of the two samples (B-2 and SSB-6) and an additional 2 feet will be excavated below these sample areas.
2. **Comment #2 and 3** – ACDEH requests that in-situ pre-characterization sampling be conducted at the site for waste disposal. As discussed during our meeting, based on the size and location of the Site in relationship to surrounding businesses, no stockpiling of impacted soil will be allowed onsite. Additionally ACDEH is of the opinion that in-situ pre-characterization samples will greatly reduce impacts to busy commercial activities conducted in the vicinity of the site. ACDEH agrees in-situ vertical delineation of soil will provide the location and segregation of non-impacted and impacted direct load excavated soils. Additionally, ACDEH notes that in-situ pre-characterization sampling will be required for proper waste manifesting on the site.
3. **Comment #4** – ACDEH requests a construction schedule that includes sequencing of construction activities during RAP implementation in order to minimize time the excavation area is open. ACDEH requests a figure illustrating an appropriately sized grid of the Site which outlines the sequencing steps in each grid. Additional information regarding soil excavation and disposal are requested on separate figures illustrating the soil sample location and excavation depths in each grid and the potential volume removed from each grid.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **Monday October 1, 2018** – Final Remedial Action Plan - Lead  
File to be named: RAP\_LEAD\_2018-10-01 RO3255

Ms. MacLeod and Mr. Uranga

RO0003255

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If you have any questions, please call me at (510) 639-1276 or send me an electronic mail message at [andrew.york@acgov.org](mailto:andrew.york@acgov.org).

Sincerely,



Drew J. York  
Senior Hazardous Materials Specialist



Dilan Roe, PE, C73703  
Chief – Land Water Division

Enclosure: Attachment 1 – Responsible Party (ies) Legal Requirement/Obligations Instructions  
Attachment 2 – Electronic File Naming Conventions

cc: Colleen Winey, QIC 80201, Zone 7 Water Agency, (*Sent via E-mail to: [cwiney@zone7water.com](mailto:cwiney@zone7water.com)*)  
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Electronic File, GeoTracker

ATTACHMENT 1

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> December 14, 2017
	<b>ISSUE DATE:</b> July 25, 2012
	<b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016
<b>SECTION:</b> ACDEH Procedures	<b>SUBJECT:</b> 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/](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 values<sup>1</sup> 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
<b>2016 Subsurface Investigation Report</b>	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
<b>2012 Site Assessment Work Plan</b>	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>2010 GW Investigation Report</b>	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	✓	✓	✓	✓	✓

<sup>1</sup> GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> NA
	<b>ISSUE DATE:</b> December 14, 2017
	<b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016
<b>SECTION:</b> ACDEH Procedures	<b>SUBJECT:</b> 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/](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 2

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> August 1, 2017
	<b>PREVIOUS REVISIONS:</b>  July 17, 2017, November 8, 2016, December 15, 2015, December 16, 2014, June 19, 2013, June 15, 2011, March 26, 2009, April 29, 2008
	<b>ISSUE DATE:</b> June 16, 2006
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> File Names for Electronic Reports

Format: REPORT\_NAME\_R\_YYYY-MM-DD  
Ex: SWI\_R\_VOL1\_2006-05-25

<b>LOP and SCP (VRAP) INCOMING REPORTS AND LETTERS</b>	
<b>Document Name</b>	<b>Abbreviation File Name= Abbreviation + Date (yyyy- mm-dd)</b>
Abandoned Well Information/Water Supply Well Information	ABWELLINF_R
Addendum	ADEND_R (added after report name)
Additional Information Report	ADD_R
Analytical Reports (Loose data sheets not in report)	ANALYT_R
As Built Drawings (or Plans)	AS_BUILT
Case File Scanned By OFD	CASE_FILE
Cleanup and Abatement Report	CAO_R
Case Transfer Form (from CUPA)	CASE_TRNSFR_F
Conduit Study/Well Search/Sensitive Receptor/Well Survey/Preferential Pathway Study	COND_WELL_R
Corrective Action Plan (CAP)	CAP_R
Correspondence	CORRES_L
Court Injunctions	INJ_L
Development Plans (Includes Plan Set, Cross-sections, and Related Drawings)	DEV_PLAN_date
Development Schedule (Project Schedule, Gant Chart, etc.)	DEV_SCHD_date
DWR Confidential Well Logs (Report containing)	report name_R_CONFIDENTIAL_YYYY-MM-DD (Ex: SWI_R_CONFIDENTIAL_YYYY-MM-DD)
DWR Well Completion Report-Confidential (Loose well logs)	DWR_WELL_CONFIDENTIAL_YYYY-MM-DD (Date of Well Log)
ESI/DAR (Environmental Site Investigation, Data Assessment Report)	ESI_R
Excavation Report	EX_R
Extension Request Letter	EXT_RQ_L
Fact Sheet	FACT_SHT



Feasibility Study	FEASSTUD_R
Groundwater Monitoring/Quarterly Summary Report	GWM_R
Financial Assurance/Letter of Credit	FNCL_ASSRNC_LOC
Interim Remedial Action Plan	IRAP_R
Interim Remediation Results (Includes Pilot Test Reports, Vapor Mitigation Reports, Soil Reports, Free Product Removal Reports, & Dual-Phase Extraction Reports)	IR_R
Lawsuit	LAWSUIT_R
Migration Control Report	MIG_R
Miscellaneous Report/Soil Sample	MISC_R
Miscellaneous Sample Report (analytical results)	MISC_SAMP_R
Notification Letter	NOT_L
NPDES Miscellaneous Reports	NPDES_R
Operations & Maintenance Plan	OM_P
Operations & Maintenance Report	OM_R
Pay for Performance	PFP_R
Petition	PETITION_R
Phase 1 Environmental Assessment Report	PHASE1_R
Photos	PHOTO_date
Preliminary Site Assessment Report/Phase 2 (historic reports only)	PSA_R
Remedial Action Plan	RAP_R
Remedial Design & Implementation Plan	RDIP_R
Remediation Progress Report	REM_R
Request for Closure	RFC(_L or _R)
Risk Assessment Report	RISK_R
Risk Based Corrective Action	RBCA_R
List of Landowners Forms	LNDOWNR_F_DATE
SB2004 Letter of Commitment	LOC_L
Site Conceptual Model/Conceptual Site Model	SCM_R
Site Health & Safety Plan	SFTY_PLAN_R
Site Management	SITE_MANAGE_R_
Site Management Plan	SMP_R
Site Summary Report	SITE_SUM_R

Soil and Water Investigation Report (Includes soil gas/vapor reports, indoor, additional site investigation, well installation, site characterization, cross section, indoor air, additional onsite investigation, Phase II/preliminary site assessment)	SWI_R
Soil Disposal Report	SOIL_DSPL_R
Source Area Characterization	SOURCAREA_R
State Information	STATE_INFO (no date)
Status Report(monthly remediation status reports addressed to sanitary district requires no stamp/perjury)	STAT_R
Tank/Tank System Removal Report	TNK_R
Tentative Order Report	TENT_R
Unauthorized Release Form	URF_R
UST Sampling Report	UST_SAMP_R
USTCF 5 Year Review	USTCF_5YR
USTCF issued Public Notice	USTCF_PP_L
Well Construction Report (limited to water supply wells)	WELL_CST_R
Well Decommissioning Report/Letter (well destruction/abandonment)	WELL_DCM_R
Work Plan	WP_R

**LOP and SLIC  
ACEH OUTGOING LETTERS AND CASE FILE DOCUMENTATION**

<b>Document Name</b>	<b>Abbreviation File Name= Abbreviation + Date (yyyy-mm-dd)</b>
90 Day Letter	90D_L
CAP Approval	CAP_AP_L
RP Certification of Public Notice	CAP_CERT_L
CAP Public Participation Letter	CAP_PP_L
CAP Public Participation Letter to RP	CAP_PPRP_L
Certified Mail Receipt	CERT_MAIL_RECEIPT
Cleanup and Abatement Order	CAO_L
Closure Public Participation Letter	CL_PP_L
Closure Package (Letter, RACC, Summary, Deed Restriction)	CLOS_L
Correspondence	CORRES_L
Deed Restriction	DEED_L_ (Copied from CLOS_L_)
Directive Letter containing Public Notice and/or Landowner request form	DIR_PP_L
Directive Letter (Landowner form, site management requirements, well decommission scheduling prior to closure of PP, copy of PP to all RPs)	DIR_L
Enforcement	ENF_L
Enforcement Referral Letter	ENF_REF_L
Extension Approval Letter	EXT_AP_L
Extension Denial Letter	EXT_DNY_L
Fund Requests	FUND_REQ_L
Final Voluntary Remedial Action Agreement	FVRAA_date
GeoTracker info	GEOTRACK_R
Late Letter	LATE_L
List of Landowners Forms	LNDOWNR_F_DATE
Mailing List for Public Notice in Excel Format	MAIL_PP_DATE
Maps & Assessor's Parcel Information	MAPS_ASSESSOR (no date)
Meeting Agenda, Minutes, Sign in Sheet	MEETING
Miscellaneous Letter	MISC_L
New Landowner Letters	LNDOWNR_REQ_L
Notice of Responsibility	NOR_L
Notice of Violation	NOV_L
Phone Log	PHONE_LOG
Photos	PHOTO_date
Post Closure Monitoring	PCMP_L
QA/QC Checklist (confidential)	QAC_report name_date
Responsible Parties Information	RPINFO_L_DATE OF THE LETTERHEAD
Returned Mail	RTN_MAIL_date

Site Visit/Inspection Report	SITEVISIT_R
Transfer Letter	TRANS_L
UST Permit	UST_PRMT
Voluntary Remedial Action Notice to State Agencies	VRA_NOTICE
Voluntary Remedial Action Request Form from RP	VREQ_F