



December 19, 2017

Mr. Jadwinder Singh  
AK Services, Inc.  
821 Corporate Way  
Fremont, CA 94539

Subject: Conditional Work Plan Approval; Fuel Leak Case No. RO0003260 and GeoTracker Global ID T10000010821, Chevron Gas Station (AK Services), 4707 First Street, Livermore, CA 94551

Dear AK Services:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file, including the *Data Gaps Investigation Work Plan*, dated October 28, 2017 prepared and submitted on your behalf by PIERS Environmental Services (PIERS). Thank you for submitting the work plan.

The referenced work plan proposed the installation of five soil bores to the depth of groundwater or 32 feet below grade surface (bgs) to collect soil, and grab groundwater analytical samples.

Based on ACDEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org)) prior to the start of field activities.

### **TECHNICAL COMMENTS**

1. **Site Assessment Work Plan Modifications** – The referenced site assessment work plan proposes a series of actions with which ACDEH is in general agreement of undertaking; however, ACDEH requests several modifications to the approach. Please submit the results of the investigation in a report by the date identified below.
  - a. **Soil Sample Selection** – ACDEH is in general agreement with the collection and submittal of soil samples at the specified intervals of 5, 10, 15, 20 feet below grade surface (bgs), provided no signs or indications of contamination were observed in each soil bore log within the interval. Otherwise, ACDEH requests that soil samples be collected between the depths of 0 to 5 and 5 to 10 feet as required by the Low Threat Closure Policy (LTCP), and requests the collection of soil samples within these depth intervals, and at deeper intervals, to be based on signs of contamination, including staining, odors, Photoionization Detector (PID) responses, or other signs of potential contamination, and at significant lithologic changes, and just above first encountered groundwater, rather than at set, predetermined depth intervals.
  - b. **Bore Placement** – ACDEH is additionally in general agreement with the location of the proposed soil bores; however, in an effort to determine the vertical extent of any residual soil contamination, requests that SB-2 and SB-5 be placed proximal to adjacent tank and piping removal confirmation samples with detectable concentrations (T3 d 4' and P3 d 3', respectively).
  - c. **Closest Wells** – Please utilize Alameda County Public Works Agency (ACPWA) and the Department of Water Resources (SWR) databases to locate wells that may have been installed since the previous well survey in 2010. Please utilize an expanded search radius of 2,000 feet, rather than the proposed 1,500 feet. This is requested in the event detectable concentrations

are present in the grab groundwater samples, and is expected to help ensure that a sufficient radius is searched only once.

- d. **Analytical Suite** – ACDEH is in agreement with the proposed analytical suite; however, under the LTCP, analysis for Poly-Aromatic Hydrocarbons (PAHs) are only required for sites with waste oil contamination. Thus the proposed PAHs can be eliminated from the analytical suite.
  - e. **Groundwater Flow Direction and Depth of Flow of Seco Arroyo Canal** – ACDEH requests verification of the depth of flow of the Seco Arroyo Canal relative to the depth of first encountered groundwater in onsite soil bores. In the event that groundwater concentrations are documented, this request is to verify that the Canal is not potentially receiving groundwater from the subject site.
  - f. **Data Quality Objectives** – In the event that the Canal receives groundwater from the subject site, please ensure that the laboratory meets the cited Data Quality Objective (DQO) for analytical detections less than Environmental Screening Levels (ESLs) as promulgated by the San Francisco Bay Regional Water Quality Control Board (RWQCB). In this situation fresh water ESLs are applicable, otherwise, applicable regulatory goals are defined by the LTCP.
2. **Claim Site On Geotracker** - As described in the Attachment 1, Responsible Party(ies) Legal Requirements/Obligations, all technical reports must be submitted to both the ACDEH ftp website and the State Water Resource Control Board (SWRCB) GeoTracker website. To upload to the Geotracker website you will need to claim your site on GeoTracker and then upload the Work Plan and all future reports to the GeoTracker website. Pursuant to CCR Sections 2729 and 2729.1, all analytical data submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, should groundwater wells be required, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports (LUFT or SLIC) is required in GeoTracker (in PDF format). Please upload all reports prepared after July 1, 2005 to the SWRCB's Geotracker database website in accordance with the above-cited regulation. At the same time, please upload the reports to the ACDEH ftp website.

#### **SUBMITTAL ACKNOWLEDGEMENT STATEMENT**

Please note that ACDEH has updated Attachment 1 with regard 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 SWRCB's Geotracker Website.*

Please make this change to your submittals to ACDEH.

#### **TECHNICAL REPORT REQUEST**

Please submit the following deliverable to ACDEH (Attention: Mark Detterman), according to the following schedule:


- **January 19, 2018** – Documentation of Geotracker Claim and Upload Status Completion
- **February 23, 2018** – Soil and Groundwater Investigation Report  
File to be named: RO3260\_SWI\_R\_yyyy-mm-dd

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.

Please note, that if your email does not appear next to your name and address, ACDEH requests that you forward it. This will expedite communications for the site.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mark Detterman', with a long horizontal flourish extending to the right.

Mark Detterman, PG, CEG  
Senior Hazardous Materials Specialist

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

cc: Tina Hariu, PIERS Environmental Services, Inc, 1038 Redwood Highway, Suite 100A, Mill Valley, CA 94941, (Sent via electronic mail to: [tina@pierses.com](mailto:tina@pierses.com))

Donal Manning, PIERS Environmental Services, Inc, 1038 Redwood Highway, Suite 100A, Mill Valley, CA 94941, (Sent via electronic mail to: [donal@pierses.com](mailto:donal@pierses.com))

Kay Pannell, PIERS Environmental Services, Inc, 1038 Redwood Highway, Suite 100A, Mill Valley, CA 94941, (Sent via electronic mail to: [kayppers@gmail.com](mailto:kayppers@gmail.com))

Dilan Roe, ACDEH, (Sent via electronic mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))

Paresh Khatri, ACDEH; (Sent via electronic mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org))

Mark Detterman, ACDEH, (Sent via electronic mail to: [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))

Electronic File; GeoTracker

<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.