

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

COLLEEN CHAWLA, Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

July 23, 2018

Ms. Carryl MacLeod
Chevron Environmental Management Company
6101 Bollinger Canyon Road
San Ramon, CA 94583
(Sent via electronic mail to:
CMacleod@chevron.com)

4336 Broadway, LLC
c/o Page Van Loben Sels
4336 Broadway
Oakland, CA 94611
(Sent via electronic mail to:
page@pagevls.com)

Gail & Heath Angelo Jr
Richard and Alice Miles
H & RK & G Block
Address Unknown

Richard and Alice Miles
Gail & Heath Angelo Jr
2608 Saklan Indian Drive
Walnut Creek, CA 94595

Barbara & Dominic Devincenzi
3348 Deer Park Drive
Walnut Creek, CA 94596

Subject: Conditional Work Plan Approval; Fuel Leak Case No. RO0003278 and GeoTracker Global ID T10000011091, Standard Oil, 4300 Broadway, Oakland, CA 94611

Dear Ladies and Gentlemen:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file, including the *Data Gap Investigation Work Plan*, dated June 12, 2018. The report was prepared and submitted on your behalf by Arcadis US, Inc. Thank you for forwarding the work plan.

The work plan proposed the installation of three groundwater monitoring wells, one soil bore, and the collection of soil and groundwater samples from beneath the site. The wells and bore were proposed proximal to historic infrastructure that appears to have been associated with fuel dispensing or storage. Thank you for including a figure in the work plan that included a current site aerial image with former infrastructure overlaid on the image and map.

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) 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 2.5, 5, 7.5, and 10 feet below grade surface (bgs). Otherwise, ACDEH 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. Additional Soil Bore for Confirmation of Potential Secondary Source Removal** – In an effort to move the case forward, ACDEH requests the addition of one soil bore at the location tentatively identified as a potential former underground storage tank (UST) by the identification of a rectangular “unknown” object by the GPR survey beneath the asphalt patch in the northern portion of the site, and the previous installation of three soil bores around the perimeter of the patch. ACDEH requests the collection of soil samples at 2.5, 5, 7.5, and 10 feet bgs within the 0 – 5 and the 5 – 10 foot depth intervals as proposed for other bores, with slight modifications as discussed above.
 - c. Full Scan VOC Analysis** – Due to the likely presence of former waste oil handling or storage, ACDEH requests the collection, on potentially a one-time basis, of Volatile Organic Compounds (VOCs) in soil and groundwater from bores near and downgradient of structures identified as potentially associated with waste oil handling or storage.
 - d. Vapor Data Evaluation** – Per the conference call and discussions of July 20, 2018 between ACDEH, Chevron, and Arcadis, ACDEH requests an evaluation of existing vapor data at the site be included in the site investigation report requested below.
- 2. GeoTracker Compliance** – A review of the State Water Resources Control Board's (SWRCB) GeoTracker website indicates the site has not been claimed, as the site was recently established in Geotracker. Because this is a state requirement, ACDEH requests that the site be claimed in GeoTracker by the date identified below. Recent modifications have been made to Geotracker for this site which should allow the site to be claimed by Responsible Parties.

TECHNICAL REPORT REQUEST

Please submit the following technical reports and deliverables to the State Water Board's Geotracker website and notify your case worker by electronic mail (mark.detterman@acgov.org), in accordance with the following specified file naming convention and schedule, as provided below, and in the Responsible Party(ies) Legal Requirements/Obligations which is included as Attachment 1. Please note ACDEH no longer accepts reports on the ftp site.

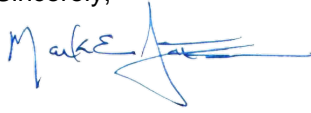
- **August 31, 2018** – Documentation of Geotracker Claim and Upload Status Completion
- **October 1, 2018** – Soil and Groundwater Investigation and Third Quarter 2018 Groundwater Monitoring Report; File to be named: RO3278_SWI_R_YYYY-mm-dd
- **January 18, 2019** – Fourth Quarter 2018 Groundwater Monitoring Report
File to be named: RO3278_SWI_R_YYYY-mm-dd
- **April 26, 2019** – First Quarter 2019 Groundwater Monitoring Report
File to be named: RO3278_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.

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

Sincerely,

A handwritten signature in blue ink that reads "Mark Detterman". The signature is stylized with a long horizontal stroke at the end.

Mark Detterman, PG, CEG
Senior Hazardous Materials Specialist

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

cc: Katherine Szymanowski, 2300 Clayton Road, Suite 400, Concord, CA 94520, (Sent via electronic mail to: Katherine.Szymanowski@arcadis.com)

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

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

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

Electronic File; GeoTracker

LIST OF LANDOWNERS FORM

County of Alameda
Environmental Health Services
Environmental Protection
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR:

Site Name: Standard Oil
Address: 4300 Broadway
City, State, Zip: Oakland, CA 94611
Record ID #: RO0003278

Please fill out item 1 if there are multiple site landowners (attach an extra sheet if necessary). If you are the sole site landowner, skip item 1 and fill out item 2.

1. In accordance with Section 25297.15(a) of Chapter 6.7 of the California Health & Safety Code, I, _____ (name of primary responsible party), certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site:

Name: _____
Address: _____
City, State, Zip: _____
E-mail Address: _____

Name: _____
Address: _____
City, State, Zip: _____
E-mail Address: _____

Name: _____
Address: _____
City, State, Zip: _____
E-mail Address: _____

2. In accordance with Section 25297.15(a) of Chapter 6.7 of the California Health & Safety Code, I, _____, certify that I am the sole landowner for the above site.

Sincerely,

Signature of Primary Printed Name Date E-mail Address

Responsible Party

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: 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/)

- 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 values¹ 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
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	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	✓	✓	✓	✓	✓

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

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

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.