

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**

AGENCY

REBBECA GEBHART, Interim Director



September 30, 2016

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

Kay & Merkle, LLP  
c/o Mr. Walter Merkle  
100 The Embarcadero,  
Penthouse

San Francisco, CA 94105

(Sent via electronic mail to: [wmerkle@kmlaw100.com](mailto:wmerkle@kmlaw100.com))

Shirley J Davini & Dorothy D McGuire  
Address Unknown

Mr. David Davini  
Loretta A McGrath Family Trust  
Address Unknown

Subject: Data Gap Work Plan and Interim Remedial Actions; Fuel Leak Case No. RO0000063;  
(Global ID # T0600102099); McGrath Steel Company, 6655 Hollis Street, Emeryville, CA  
94608

Dear Ladies and Gentlemen:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file for the above referenced site including the *Data Gap Investigation Report*, dated August 3, 2016 (received August 22, 2016). The report was prepared and submitted on your behalf by AllWest Environmental, Inc. (AllWest). Thank you for submitting the report.

The report documented the installation of an upgradient soil bore, and the installation of temporary soil vapor probes, sub-slab vapor pins in the warehouse associated with the subject site, as well as the collection of indoor air vapor samples in the warehouse. The work was conducted in large part to determine if an imminent vapor intrusion concern is present for the subject warehouse and downgradient buildings. As such not all areas of concern within the context of the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) were evaluated.

ACDEH has evaluated the data and recommendations presented in the above-mentioned reports, in conjunction with the case files, and SWRCBs LTCP. Based on ACDEH staff review, we have updated the LTCP checklist on Geotracker; however, have also determined that the site currently fails to meet the LTCP General Criteria d (LNAPL Removal), f (Secondary Source Removal), the Media-Specific Criteria for Groundwater, the Media-Specific Criteria for Vapor Intrusion to Indoor Air, and the Media-Specific Criteria for Direct Contact (see Geotracker for an updated copy of the LTCP checklist).

At this juncture ACDEH requests that you prepare a Data Gap Investigation Work Plan and identify Interim Remedial Actions that are supported by a focused Site Conceptual Model (SCM) to address the Technical Comments provided below.

Prior to submitting the Data Gap Work Plan, ACDEH would like to invite you to meeting in order to discuss the site and to discuss a path forward. ACDEH requests notification of suitable dates and times for the meeting by the date identified below.

### **TECHNICAL COMMENTS**

**1. LTCP General Criteria d; Removal of LNAPL to the Maximum Extent Practicable** – The LTCP requires LNAPL to be removed to the extent practicable at release sites where investigations indicate the presence of free product by removing in a manner that minimizes the spread of the unauthorized release into previously uncontaminated zones by using recovery and disposal techniques appropriate to the hydrogeologic conditions at the site, and that properly treats, discharges, or disposes of recovery byproducts in compliance with applicable laws. Additionally, the LTCP requires that

abatement of free product migration be used as a minimum objective for the design of any free product removal system.

ACDEH's review of the case files indicates that there is indirect evidence of LNAPL in the vicinity of well MW-3, at a minimum. Groundwater concentrations in well MW-3, B-22, B-21, B-20, and B-16 exceed concentrations that the *Technical Justification for Vapor Intrusion Media-Specific Criteria*, generated in support of the LTCP, suggest is "indirect" evidence of LNAPL. Grab groundwater concentrations collected in January 2013 in the soil bores, and in February 2015 in well MW-3, indicate that concentrations up to 160,000 micrograms per liter ( $\mu\text{g/l}$ ) Total Petroleum Hydrocarbons [TPH] as gasoline, 95,000  $\mu\text{g/l}$  TPH as diesel, 21,000  $\mu\text{g/l}$  benzene, and 140,000  $\mu\text{g/l}$  MTBE were detected at groundwater collected from these soil bores.

Groundwater monitoring has apparently not been conducted since February 2015; however, was previously requested to be placed on a semi-annual groundwater monitoring and sampling interval. The site is out of compliance with this request. Data generated during groundwater monitoring events will help to determine the status of LNAPL on groundwater at the site and vicinity. Please present a strategy to address this Technical Comment, including any appropriate pilot tests, as requested below in Technical Comment 6 and 7.

2. **General Criteria f – Secondary Source Has Been Removed to the Extent Practicable** – The bore log for soil bore B-22 appears to have documented the removal of the secondary soil source beneath the former underground storage tanks (USTs) to the extent practicable. As documented by the bore log for soil bore B-24, it is not clear that the secondary source beneath the former dispenser has been removed to the extent practicable. Additionally, the presence of LNAPL can be considered a significant source; however, under the LTCP it is not considered a secondary source, but a residual source. Please present a strategy to address this Technical Comment in the Interim Remedial Action Plan (IRAP) requested below in Technical Comment 6 and 7.
3. **LTCP Media Specific Criteria for Groundwater** – To satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites listed in the policy.

Our review of the case files indicates that the site data collection and analysis do not support the requisite characteristics of one of the five scenarios under the criteria. Our review of the case files indicates that insufficient data and analysis has been presented to support the requisite characteristics of plume stability or plume classification as follows:

- a. **Length of LNAPL Plume** – As noted above the extent of the LNAPL plume may extend further west than well MW-3. Based on grab groundwater analytical concentrations at soil bore B-21, soil vapor concentrations documented at a depth of 5 feet below the warehouse foundation, and the southwesterly groundwater gradient direction generally depicted for the site, the LNAPL plume may extend beneath the warehouse. At present the extent of the LNAPL plume in soil or groundwater does not appear to be defined.
- b. **Length of Groundwater Dissolved-Phase Plume** – The length of the dissolved-phased plume may be adequately defined to the west; however, the southwest groundwater flow direction beneath the warehouse building as well as the elevated soil vapor concentrations collected at five feet below the warehouse foundation confirm that the dissolved-phase groundwater plume extends beneath the warehouse and is thus undefined. Based on soil bore SB-26, the upgradient extent of groundwater concentration also does not appear to be defined.
- c. **Water Well and Sensitive Receptor Survey** – Please note that the previous requested water well survey has not been conducted and the site is not in compliance with ACDEH directives, and with LTCP requirements. A water survey is required to determine the location of any water supply wells in the vicinity of the subject site. As a consequence, ACDEH requests the identification and location on a site vicinity figure all active, inactive, standby, decommissioned

(sealed with concrete), unrecorded, and abandoned (improperly decommissioned or lost) wells including irrigation, water supply, industrial, dewatering, and cathodic protection wells within a 2,000-foot radius of the site. Additionally, please identify on the same figure beneficial resources and other sensitive receptors including, but not limited to, groundwater classification, wetlands, surface water bodies, natural resources, schools, hospitals, day care centers, elder care facilities, etc. Please plot the numbered well locations on an aerial photography-based figure and provide an associated table using the same numbered well locations. Please note that well construction details are considered to be confidential and therefore should not be referenced or uploaded to public websites.

- d. **Benzene Concentrations** – Benzene concentrations up to 21,000 µg/l have been detected in grab groundwater samples (B-20), and up to 9,800 µg/l in groundwater collected from well MW-3. Thus benzene concentrations exceed all LTCP groundwater media-specific criteria.

Please present a strategy to address this Technical Comment as requested below in Technical Comment 7.

4. **LTCP Media Specific Criteria for Vapor Intrusion to Indoor Air** – The LTCP describes conditions, including bioattenuation zones, which if met will assure that exposure to petroleum vapors in indoor air will not pose unacceptable health risks to human occupants of existing or future site buildings, and adjacent parcels. Appendices 1 through 4 of the LTCP criteria illustrate four potential exposure scenarios and describe characteristics and criteria associated with each scenario.

Our review of the case files indicates that the site data and analysis fail to support the requisite characteristics of one of the vapor scenarios as follows:

- a. **Bioattenuation Zone** – In the view of ACDEH, a five foot bioattenuation zone has not been established beneath the warehouse building, or further downgradient, due to the lack of soil analysis for Total Petroleum Hydrocarbons as diesel (TPHd) from recent soil bores. The Vapor Intrusion Criteria of the LTCP requires determining that the total TPH mass in the bioattenuation zone for all hydrocarbons released at a site be less than 100 milligrams per milligram (mg/kg). Based on other onsite data, the site does not appear to have a bioattenuation zone.
- b. **Soil Vapor Concentrations** – Recently collected soil vapor concentrations, collected in accordance within LTCP guidelines, fail to meet a site with, or without, a five foot bioattenuation zone (Scenario 4). Benzene concentrations up to 1,600,000 micrograms per cubic meter (µg/m<sup>3</sup>), ethylbenzene concentrations up to 810,000 µg/m<sup>3</sup>, and naphthalene up to < 260,000 µg/m<sup>3</sup> were detected. Oxygen was as low as 2.72 percent, but ranged between 2.72 and 11.3 percent.
- c. **Methane** – At two locations (SVP-1 and SVP-3) methane concentrations were near or above the Lower Explosive Level (LEL) for methane of approximately 5 percent. These concentrations represent potential explosion risks for the site, can be considered a nuisance concern within the context of the LTCP, and at a minimum require mitigation.
- d. **Sub-Slab Vapor Concentrations** – Sub-slab vapor concentrations were collected during the recent site vapor investigation. Based on the one-time event it appears that sub-slab vapor concentrations generally meet the San Francisco Bay Regional Water Quality Control Board (RWQCB) Environmental Screening Levels (ESLs) except for TPH as gasoline (TPHg) at SVP-7. Of note to ACDEH is that SVP-7 is located furthest from the release source, yet consistently produced the highest sub-slab vapor concentrations at the site. This can suggest an extensive groundwater contaminate plume beneath the warehouse, or a potential additional source near that location and at a minimum requires repeat sampling to clarify the data. In conformance with Department of Toxics Control (DTSC) guidance, repeat vapor sampling events are appropriate to determine seasonal vapor ranges.
- e. **Indoor Air Vapor Concentrations** – Indoor air vapor concentrations were also collected during the recent site vapor investigation. Although indoor air vapor concentrations were consistently

higher than the outdoor ambient air vapor concentration collected on the date of the sampling event for the contaminants of concern at the site, the referenced report concluded that an outdoor air source was likely the cause of the indoor air concentrations. This statement appears to be based on the results of the sub-slab vapor concentrations and the attenuation seen between soil vapor probe sampling depths and the sub-slab sample depth. Based on the one-time sampling data, ACDEH is not in agreement with the stated conclusions. Additional sampling events appear warranted per DTSC guidance.

Review of the building survey form in the report indicates some consumer products were noted in the office; however, it is not clear that the products were removed for a period of time prior to the collection of the indoor air samples to prevent potential cross-contamination of the indoor air samples. ACDEH notes that no consumer products were noted in the warehouse; however, indoor air vapor concentrations were generally higher than the office. This suggests a vapor intrusion concern is present downgradient of the source. ACDEH additionally notes that the limits of detection for TPHg indoor air samples did not achieve RWQCB indoor air ESLs for a commercial property, thus cannot determine if these concentrations are below the commercial ESL for TPHg.

- f. **Nature and Quality of On-Site and Downgradient Slab** – At present the general condition and quality of the slab at the site, and slabs downgradient of the site, have not been described or documented. The number and size of cracks, joints, thickness, age, pour quality, and the number of slab penetrations are unknown factors in determining the potential for vapor intrusion to the site and downgradient properties.

Please present a strategy in the Data Gap Investigation Work Plan as described in Technical Comment 7 below to collect additional data to satisfy the bioattenuation zone characteristics of one of the four LTCP vapor intrusion scenarios, to ensure that exposure to petroleum vapors in indoor air does not pose unacceptable health risks to human occupants of existing or future site buildings, and adjacent properties. ACDEH requests that soil samples be collected from all proposed bores for all requisite analysis, including naphthalene.

Please note, that if direct measurement of soil gas is proposed, ensure that your strategy is consistent with the field sampling protocols described in the Department of Toxic Substances Control's Final Vapor Intrusion Guidance (October 2011). Consistent with the guidance, ACDEH requires installation of permanent vapor wells to assess temporal and seasonal variations in soil gas concentrations.

5. **LTCP Media Specific Criteria for Direct Contact and Outdoor Air Criteria** – The LTCP describes conditions where direct contact with contaminated soil or inhalation of contaminants volatilized to outdoor air poses a low threat to human health. According to the policy, release sites where human exposure may occur satisfy the media-specific criteria for direct contact and outdoor air exposure and shall be considered low-threat if the maximum concentrations of petroleum constituents in soil are less than or equal to those listed in Table 1 for the specified depth bgs. Alternatively, the policy allows for a site specific risk assessment that demonstrates that maximum concentrations of petroleum constituents in soil will have no significant risk of adversely affecting human health, or controlling exposure through the use of mitigation measures, or institutional or engineering controls.

Our review of the case files indicates that benzene concentrations up to 12 mg/kg was recently (2013) documented to be present at a depth of 10 feet in soil bore B21, and that this concentration exceeds allowable concentrations listed in Table 1 of the LTCP. Because of the presumed southwesterly groundwater flow direction, additional elevated soil contamination is likely to be present beneath the warehouse, at a minimum. The referenced report established that contaminant concentrations in soil between 0 and 5 feet bgs do not appear to exceed Table 1 values beneath the warehouse located at the site; however, soil between 5 and 10 feet must also be characterized within the context of Table 1 of LTCP. ACDEH does not agree that the vertical extent of soil contamination is defined beneath the warehouse.

Therefore, please present a strategy in the Data Gap Investigation Work Plan as described in Technical Comment 7 below to collect additional data to laterally define the extent of soil contamination that does not satisfy the direct contact and outdoor air exposure criteria in areas immediately downgradient of the former UST location and soil bore B21. As before, ACDEH requests that soil be collected and analyzed in the 0 to 5 and the 5 to 10 foot intervals, at the groundwater interface, lithologic changes, and at areas of obvious impact. ACDEH additionally requests that groundwater samples be collected from these borings and requisite analysis, including naphthalene, be conducted. Due to the former presence of a diesel UST, TPHd is required to be collected.

6. **Interim Remedial Action Plan** - ACDEH requests the identification of interim remedial actions, including any requisite pilot testing, to investigate and abate potential LNAPL migration. Please present the proposed strategy in an Interim Remedial Action Plan (IRAP) by the date identified below.
7. **Focused Site Conceptual Model and Data Gap Investigation Work Plan** – Please prepare a Data Gap Investigation Work Plan to address the technical comments listed above. Please support the scope of work in the Data Gap Investigation Work Plan with a focused SCM and Data Quality Objectives (DQOs) that relate the data collection to each LTCP criteria. For example please clarify which scenario within each Media-Specific Criteria a sampling strategy is intended to apply to.

In order to expedite review, ACDEH requests the focused SCM be presented in a tabular format that highlights the major SCM elements and associated data gaps, which need to be addressed to progress the site to case closure under the LTCP. Please sequence activities in the proposed data gap investigation scope of work to enable efficient data collection in the fewest mobilizations possible.

8. **Semi-Annual Groundwater Monitoring** – As previously requested, please initiate groundwater monitoring of all site vicinity wells on a semi-annual basis, and continue analytical analysis for all chemicals of concern at the site. The site is out of compliance with ACDEH directives in this regard. Please sample groundwater in the months of August and February of each year until otherwise arranged. Please include a table reporting the total volume of free-phase and groundwater removed during each servicing of the free-phase passive skimmer (past and future) in these groundwater monitoring reports. Please submit semi-annual reports by the dates identified below.

#### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACDEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with Attachment 1 and the specified file naming convention below, according to the following schedule:

- **May 20, 2016** – Semi-Annual Groundwater Monitoring Report - **Late**  
File to be named: RO63\_GWM\_R\_YYYY-MM-DD
- **October 28, 2016** – Potential Meeting Dates  
Please email you case worker
- **November 4, 2016** – Semi-Annual Groundwater Monitoring Report  
File to be named: RO63\_GWM\_R\_YYYY-MM-DD
- **December 5, 2016** – Data Gap Investigation Plan, Interim Remedial Actions, and Focused Site Conceptual Model; File to be named: RO63\_WP\_SCM\_R\_YYYY-MM-DD
- **60 Days After Work Plan Approval** – Soil and Groundwater Investigation Report  
File to be named: RO63\_SWI\_R\_YYYY-MM-DD
- **April 28, 2017** – Semi-Annual Groundwater Monitoring Report  
File to be named: RO63\_GWM\_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

Ladies and Gentlemen  
RO0000063  
September 30, 2016, Page 6

party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

Online case files are available for review 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, ACDEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

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

Sincerely,

Mark E. Detterman, PG, CEG  
Senior Hazardous Materials Specialist

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

cc: Leonard Niles, AllWest Environmental, Inc, 530 Howard Street, Suite 300, San Francisco, CA 94105; (Sent via electronic mail to: [leonard@allwest1.com](mailto:leonard@allwest1.com))

Jon Wactor, Esq., Wactor & Wick LLP Environmental Attorneys, 180 Grand Avenue, Suite 950, Oakland, CA 94612; (Sent via electronic mail to: [jonwactor@ww-envlaw.com](mailto:jonwactor@ww-envlaw.com))

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

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

## 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/](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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> May 15, 2014
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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](mailto: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](mailto: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.