

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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June 29, 2007

Mr. Robert Saur
PG&E
3400 Crow Canyon Road
San Ramon, CA 94583

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

Dear Mr. Saur:

Subject: Leak Site RO0000099 & Global ID # T0600100258, PG&E GC Gas Service,
4930 Coliseum Way, Oakland, CA 94601

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the subject site including your May 10, 2007 letter and the May 2007 Semiannual Groundwater Monitoring Report, April 2007 Sampling Event prepared by ITSI. Your letter states that PG&E plans to seek "clean closure" for your site and that you would not choose to use a deed restriction. You also encourage the County to actively pursue the up-gradient sites, which may be a contributor to the halogenated volatile organic compounds (HVOCs), including dichlorobenzene, detected in groundwater beneath your site.

The presence of chlorinated solvents on this and the neighboring properties (AAA Property, 745 50th Ave., Learner Property, 768 46th Ave. and Superior Plaster Property, 4800 Coliseum Way) appears to have been through common historic releases that occurred on each of the properties resulting in a commingled plume. Therefore, all parties are considered responsible for the release. Although there may be differences in the contaminant concentrations on these properties, there is insufficient data to determine the relative contribution from individual properties, therefore, we encourage all parties to co-operate in terms of sharing data and generating compatible and comprehensive CAPs for their sites. It may not be technically feasible to remediate all contaminant sources, particularly when contamination exists beneath buildings. As such, all properties may not be able or may not choose to remediate their sites to "clean" closure. You are aware that AAA Property has chosen to seek closure for their site for industrial use only and will include a deed restriction. We recognize these sites are located within an industrial area and therefore it may not be reasonable to remediate sites to unrestricted use.

Although we have no objection with a proposal to remediate your site to "clean" unrestricted use, we believe this is not possible without the co-operation of all source properties. A joint work plan would be required to insure that your property met all the requirements for such a closure. This corrective action plan (CAP) would require public notification, comment and regulatory approval.

We anticipate your work plan would include the following elements:

- All historical information including Phase I and Phase II reports for the PG&E and neighboring sites
- A site conceptual model

- Soil and groundwater iso-concentration maps
- Evaluation of plume definition
- Your Corrective Action Plan or Interim Remediation Plan should include proposed clean-up levels for soil and groundwater and a plan for soil vapor sampling.

TECHNICAL REPORT REQUEST

Please submit the following technical report to our office according to the following schedule:

- July 29, 2007- Joint Work Plan for Remediation of Site

ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, 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 ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at barney.chan@acgov.org.

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

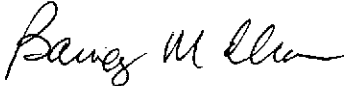
The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For 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.

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.

If you have any questions, please call me at (510) 567-6765.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: files, D. Drogos, J. Wickham

Leroy Griffin, OFD

Stephen Hill, SFRWQCB

Mr. Bob Schultz, Geomatrix, 2101 Webster St. #12, Oakland, CA 94612

Mr. Jack Krause, Alta Properties LLC, P.O. Box 2399, Oakland,
CA 94614

Ms. Marcella Harrison, GVA Kidder Mathews, 505 Sansome Street, Suite 300,
San Francisco, CA 94111

Mr. Robert Nichols, P.O. Box 6716, Oakland, CA 94603-0716

Mr. John Miller, 1550 Wakefield Terrace, Los Altos, CA 94024-5864

Mr. Richard Nue, Nue Investments, 47 Parsipny Rd., Whippany, NJ, 7981