



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

November 2, 2010

Ms. Ann Conner (*Sent via E-mail to: apb1@pge.com*)
PG&E
3401 Crow Canyon Road, Room 176C
San Ramon, CA 94583

Subject: Conditional Work Plan Approval for SLIC Case No. RO0000099 and Geotracker Global ID T0600100258, PG&E, 4930 Coliseum Way, Oakland, CA 94601

Dear Ms. Conner:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above referenced site including the recently submitted document entitled, "*Soil Investigation Work Plan, PG&E Oakland General Construction Yard, 4930 Coliseum Way, Oakland, California,*" dated September 16, 2010. The document, which was prepared on your behalf by AMEC Geomatrix, presents plans for collecting soil samples in the area of a former above ground natural gas holder tank (GHT).

The proposed scope of work may be implemented provided that the technical comments below are addressed during implementation of the field investigation. Submittal of a revised Work Plan or Work Plan Addendum is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

- Proposed Laboratory Analysis.** We note that cadmium and PCBs have been detected at concentrations exceeding screening criteria in one or more soil samples collected in the area of the GHT or the area immediately north of the GHT. We also note that only a few soil samples collected in the area of the former GHT have been analyzed for any chemicals other than lead. Based on previous sampling results and the history of the site, we request that you analyze a limited number of the proposed soil samples for analytes in addition to the lead. Specifically, we request that soil samples from five of the proposed sampling locations (see attached revision of Figure 7 of the Work Plan) be analyzed for California Title 22 metals using EPA Method 6010B, polycyclic aromatic hydrocarbons using EPA Method 8270 in selective ion monitoring mode, and PCBs using EPA Method 8080. Please include these results in the Site Investigation Report requested below.
- Groundwater Sampling.** Groundwater monitoring at the site was discontinued with ACEH concurrence following the November 2009 sampling event. During groundwater monitoring events, groundwater samples collected at the site were analyzed for dissolved lead, VOCs, and petroleum hydrocarbons. We request that groundwater samples be collected from the three monitoring wells in the area of the GHT to confirm that groundwater in the area of the GHT is not affected by chemicals of concern other than dissolved lead, VOCs, and petroleum hydrocarbons. Specifically, we request that groundwater samples be collected from wells OW-2, OW-5, and OW-8 and analyzed for dissolved California Title 22 metals using EPA Method 6010B and dissolved chromium VI using EPA Method 7196A.

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TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **March 18, 2011** – Site Investigation Report

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Attachments: Responsible Party(ies) Legal Requirements/Obligations
Modified Figure 7 Proposed Sampling Locations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Susan Gallardo, AMEC Geomatrix, 2101 Webster Street #12, Oakland, CA 94612 (*Sent via E-mail to: Susan.Gallardo@amec.com*)

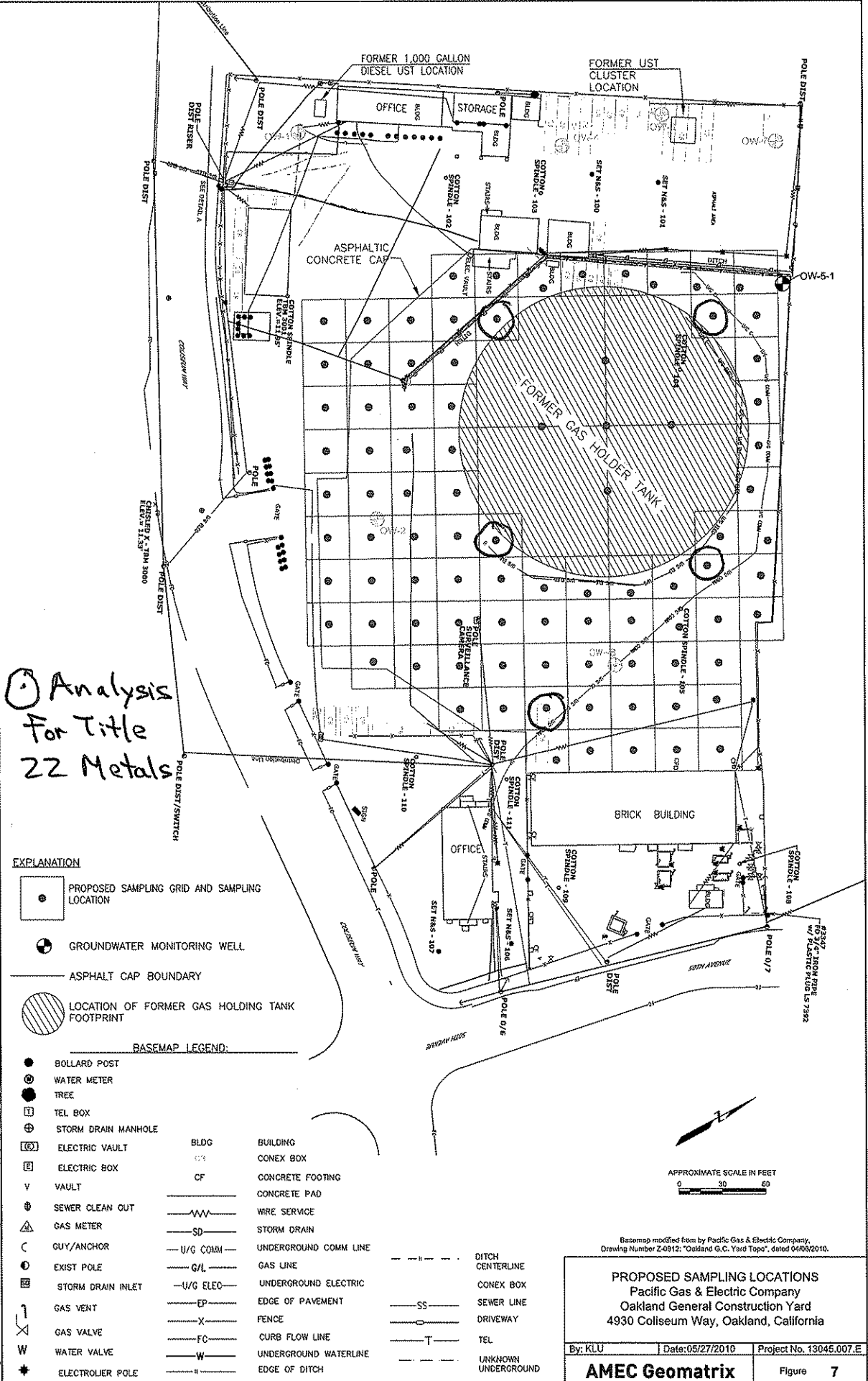
Yemia Hashimoto, AMEC Geomatrix, 2101 Webster Street #12, Oakland, CA 94612 (*Sent via E-mail to: Yemia.Hashimoto@amec.com*)

Donna Drogos, ACEH (*Sent via E-mail to: donna.drogos@acgov.org*)

Jerry Wickham, ACEH (*Sent via E-mail to: jerry.wickham@acgov.org*)

GeoTracker, File

Analysis
For Title
22 Metals

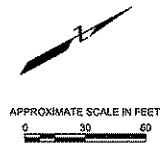


EXPLANATION

- PROPOSED SAMPLING GRID AND SAMPLING LOCATION
- GROUNDWATER MONITORING WELL
- ASPHALT CAP BOUNDARY
- LOCATION OF FORMER GAS HOLDING TANK FOOTPRINT

BASEMAP LEGEND:

- | | | | | | |
|--|---------------------|--|-----------------------|--|---------------------|
| | BOLLARD POST | | BUILDING | | DITCH CENTERLINE |
| | WATER METER | | CONEX BOX | | CONEX BOX |
| | TREE | | CONCRETE FOOTING | | SEWER LINE |
| | TEL BOX | | CONCRETE PAD | | DRIVEWAY |
| | STORM DRAIN MANHOLE | | WIRE SERVICE | | TEL |
| | ELECTRIC VAULT | | STORM DRAIN | | UNKNOWN UNDERGROUND |
| | ELECTRIC BOX | | UNDERGROUND COMM LINE | | |
| | VAULT | | GAS LINE | | |
| | SEWER CLEAN OUT | | UNDERGROUND ELECTRIC | | |
| | GAS METER | | EDGE OF PAVEMENT | | |
| | GUY/ANCHOR | | FENCE | | |
| | EXIST POLE | | CURB FLOW LINE | | |
| | STORM DRAIN INLET | | CURBED FLOW LINE | | |
| | GAS VENT | | UNDERGROUND WATERLINE | | |
| | GAS VALVE | | EDGE OF DITCH | | |
| | WATER VALVE | | | | |
| | ELECTROLIER POLE | | | | |



Basemap modified from by Pacific Gas & Electric Company, Drawing Number Z-0912, "Oakland G.C. Yard Topo", dated 04/08/2010.

PROPOSED SAMPLING LOCATIONS
Pacific Gas & Electric Company
Oakland General Construction Yard
4930 Coliseum Way, Oakland, California

By: KLU	Date: 05/27/2010	Project No. 13045.007.E
AMEC Geomatrix		Figure 7

Plot Date: 05/27/10 - 1:57pm, Plotted by: jbrubaker
 Drawing Path: N:\13045\013045_007_Etask.dwg, Drawing Name: 05_27_savory_and_gfd.dwg

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.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml).

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: 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 dehloptoxic@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 dehloptoxic@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.