



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

April 13, 2009

Geoffrey Sears
Wareham Property Group
5858 Horton St., Suite 263
Emeryville, CA 94608

Mrs. Wilma Alders
3356 Betty Lane
Lafayette, CA 94549

Subject: Fuel Leak Case No. RO0000201 and Geotracker Global ID T0600101109, Hydraulic Electro Service, 5812 Hollis St., Emeryville, CA

Dear Mr. Sears and Mrs. Wilma Alders:

Alameda County Environmental Health (ACEH) staff have reviewed the fuel leak case file and the report submitted by Leong Environmental entitled, *Revised Groundwater Investigation Work Plan* dated November 25, 2008. The work plan proposes installing three borings in the area of the former underground storage tanks (USTs). Two borings will be advanced in the corner of the former tank pit to evaluate the lateral extent of contaminants in groundwater. The remaining boring will be advanced in the middle of the former tank pit to delineate the vertical extent of soil and groundwater contamination. The existing monitoring well, MW-1, will be redeveloped and sampled.

The proposed work scope may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during field implementation. Submission of a revised work plan is not required. Please perform the work and submit the report by the date requested below.

Please provide 72-hour advance written notification to this office by e-mail (barbara.jakub@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Investigation of Former UST Area** – Your proposal to collect groundwater samples through temporary casings that extend across the water table is approved. However, we require that each of the screened intervals be no longer than 4 feet in length with a maximum sand pack interval of 5 feet to ensure that the samples are depth discrete. In addition to your proposed soil sampling at five foot intervals, we request that you continuously log the soil and submit soil samples for analysis in each of these borings at the capillary fringe, at lithologic changes and areas of obvious contamination. We also request that if the boring locations need to be adjusted based on utilities, that they not be placed on the downgradient side of the sewer line.
2. **Depth to Groundwater** – The depth of the groundwater samples were not included on the tables presented in the work plan. Please update the table to include the depths to water and ensure that the depths to water are included on the tables for groundwater and

monitoring well samples (as well as on the boring logs) collected during this investigation and submit this information in the report requested below.

3. **Sewer Line** – The depth of the sewer line was not specified on the map. Please identify the depth of the sewer and evaluate if this could be a potential migration pathway for contaminants. Also, determine where the sewer lateral connects to the sewer main and include on the map. Include all information on a cross-section using your new and old soil borings, analytical data and groundwater level data obtained from this investigation. If the groundwater and soil results indicate that contamination is present in the borings, please provide a proposal to evaluate the lateral and vertical extent of contamination and whether contamination is preferentially migrating through the sewer backfill in the report requested below.
4. **Motor Oil** – TPH as motor oil has been detected in soil both nearby the former UST locations and on the adjacent site currently managed by the City of Emeryville under a Memorandum of Understanding with the Department of Toxic Substances Control (DTSC). A maximum concentration of TPH_{mo} was detected in soil from TR-4 at a depth of 1.5 to 2.0 feet below ground surface approximately 25 feet away from the former USTs. Please analyze all samples collected during this investigation for motor oil and also furnish this data to the City of Emeryville.
5. **GeoTracker Compliance** – Per previous request dated July 3, 2008, please claim the site in Geotracker and upload the necessary reports. These include the two work plans that have been submitted to the ACEH ftp site but have not been uploaded to the State Water Resources Control Board's (SWRCB) GeoTracker website. Electronic reporting is described below.

TECHNICAL REPORT REQUEST

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

- **May 13, 2009** – Claim site in Geotracker and upload reports
- **July 13, 2009** – Soil and Water Investigation Report

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.

LANDOWNER NOTIFICATION REQUIREMENTS

Pursuant to California Health & Safety Code Section 25297.15, the active or primary responsible party for a fuel leak case must inform all current property owners of the site of cleanup actions or requests for closure. Furthermore, ACEH may not consider any cleanup proposals or requests for case closure without assurance that this notification requirement has been met. Additionally, the active or primary responsible party is required to forward to ACEH a complete mailing list of all record fee title holders to the site.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please be aware that you may be eligible for reimbursement of the costs of investigation from the California Underground Storage Tank Cleanup Fund (Fund). In some cases, a deductible amount may apply. If you believe you meet the eligibility requirements, we strongly encourage you to call the Fund for an application.

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

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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.

If you have any questions, please call me at (510) 639-1287.

Sincerely,

A handwritten signature in black ink that reads "Barbara J. Jakub". The signature is written in a cursive style and is followed by a long horizontal line that extends to the right.

Barbara J. Jakub, P.G.
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Glenn Leong, Leong Environmental, 2534 42nd Ave., San Francisco, CA 94116
Susan Coleman, c/o City of Emeryville, 1333 Park Avenue, Emeryville, CA 94608
Barbara Jakub, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: March 27, 2009
	PREVIOUS REVISIONS: December 16, 2005, October 31, 2005
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

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- 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)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

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
Or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of My Le Huynh.
 - 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 and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - 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.