Stantec Consulting Services Inc.
15575 Los Gatos Boulevard Building C
Los Gatos CA 95032
Tel: (408) 356-6124
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February 21, 2012

Mr. Keith Nowell, P.G., C.H.G.
Alameda County Health Care Services
Environmental Protection Division
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Dear Mr. Nowell:

Reference: **Response to Alameda County Health Care Services Agency Technical Comments for the Former Hegenberger Maintenance Station**
555 Hegenberger Road
Oakland, California

Stantec Consulting Services Inc. (Stantec) has prepared this response to the technical comments provided by the Alameda County Environmental Health Care Services Agency (ACHCSA) in the February 3, 2012 letter regarding Stantec's previously submitted *"Semi-annual Groundwater Monitoring Report"*, *"Preferential Pathway Study"*, and *"Work Plan for a Subsurface Investigation"* for the California Department of Transportation (Caltrans) Former Hegenberger Maintenance Station, located at 555 Hegenberger Road, Oakland, California. The format of this response presents the ACHCSA technical comments in *italics*, followed by Stantec's response.

TECHNICAL COMMENTS

1. ELECTRONIC REPORT AND DATA UPLOAD COMPLIANCE – *A review of the case file and the State's GeoTracker database indicates that the site is not in compliance. Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs, including SLIC programs. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites was required in GeoTracker. At present missing data and documents include, but may not be limited to, depth to groundwater and all bore logs. Please see Attachment 1 for limited additional details, and state GeoTracker website for full details. ACEH requests notification of, and a list of, the documents uploaded to GeoTracker. Please upload all submittals to GeoTracker as well as ACEH's ftp website by the date specified below.*

Stantec has contacted the previous environmental consultants (GeoCon Consultants Inc. [GeoCon] and Professional Services Industries [PSI]) to inquire about the availability of electronic data deliverables (EDFs) for the analytical data for the previously submitted 2001 to 2005 groundwater monitoring reports. At this time, not all of the previous analytical data may be available. Stantec will upload what reports, analytical data, boring logs, groundwater monitoring well construction diagrams, and depth to water data for the Site is available by the requested date.

2. MONITORING WELL REHABILITATION

a. *Prior to the groundwater monitoring episode documented in the November 15, 2011 referenced report, the groundwater monitoring wells at the site had not been sampled in more than 5 years. ACEH requested the wells be redeveloped prior to sampling. Communications with your consultant, Stantec confirmed the wells would be redeveloped and that ten (10) well volumes of groundwater would be removed during the course of the development process. It appears only a minimal effort was performed with one of the five wells, with no attempt to redevelop the remaining four wells. Additionally, the wells were sampled a day after the wells were purged. Poor groundwater recharged was cited as the reason. All previous groundwater monitoring/sampling events were conducted on the same day the wells were purged. The poor groundwater recharge experienced by the recent sampling event suggests the wells need to be redeveloped. Please redevelop the wells using a truck-mounted development rig before the next sampling episode. Please remove a minimum of ten (10) well volumes of groundwater during the redevelopment process. Allow a minimum of seventy-two (72) hours between well redevelopment and sampling. Include the results in the First Quarter 2012 Soil and Groundwater Investigation report.*

Stantec will redevelop and remove 10 well volumes from each of the Site's groundwater monitoring wells with a truck-mounted development rig at least 72-hours prior to the next sampling event (First Quarter 2012). Following redevelopment, Stantec will utilize a low-flow submersible pump to collect groundwater for analysis.

b. *The groundwater monitoring wells may be improperly secured as the November 15, 2011 report indicated the wells are in disrepair with stripped or missing well cover bolts. Please perform maintenance on the wells to adequately secure the wells.*

Stantec will repair and/or replace the stripped and missing well cover bolts for the groundwater monitoring wells during the next sampling event. If necessary, entire well boxes may be removed and replaced with new traffic rated well boxes.

c. **REQUEST FOR COORDINATED GROUNDWATER CONTAMINANT PLUME MONITORING AND SAMPLING** – *ACEH is requiring that groundwater monitoring and sampling for this site be coordinated on the same day with groundwater monitoring, sampling, and reporting for the adjoining trucking facility west of the Caltrans site, at located at 8099 S. Coliseum Drive. The ACEH case number for the adjacent facility is RO1389. By copy of this letter requirement is provided to all the referenced sites. ACEH is requiring that groundwater monitoring, sampling, and reporting continue at these sites in accordance with the schedule below. Please submit groundwater monitoring reports for the First and Third Quarter, 2012 by the dates identified below.*

Caltrans has been in communication with representatives of the General Motors Truck Center (adjoining the Caltrans property at 8099 S. Coliseum Drive) to coordinate access to the Caltrans property and coordinate sampling events for the same day; however, at the time of this letter an access agreement has not been worked out and a schedule for sampling has not been finalized. Caltrans will continue to attempt to finalize the access agreement and to coordinate sampling activities with the adjoining trucking facility.

3. PREFERENTIAL PATHWAY STUDY - *Several omissions were noted in the Preferential Pathway Study (PPS). Please address in the work plan addendum or in the Site Conceptual Model (SCM) as specified below.*

a. *The December 12, 2012 PPS, Site History and Previous Investigations section, does not address the concentrations of residual petroleum hydrocarbons in soil at the site nor does not address the significance of the off0site borehole locations BH-1 through BH-4 depicted adjacent to the former UST pit on Figure 2 of the PPS. Documenting the distribution of the residual hydrocarbons in soil might aid in the placement of the proposed boring locations. Please address these in the addendum work plan.*

The off-Site borehole locations BH-1 and BH-4 adjacent to the former underground storage pit were not addressed in the PPS because email correspondence and ACHCSA letter dated September 28, 2011 stated the PPS should include an evaluation of utility lines and well survey within a ¼ mile radius. Stantec will include a discussion of the off-Site borehole results in the Site Conceptual Model.

b. *The PPS did not discuss the source of the apparent mounding of groundwater in the area east of MW-1 resulting in a somewhat radial flow. Please discuss how the source of the apparent mounting might be identified in the SCM.*

At this time, Stantec does not have a clear understanding of the source of the mounding in the vicinity of MW-1. As part of the next scope of work, Stantec will have each of the groundwater monitoring wells resurveyed in an effort to confirm that the groundwater monitoring well elevations are correct. The mounding of groundwater in area east of groundwater monitoring well MW-1 could be due to an inaccurate survey measurement. Stantec professional surveyor, registered in the State of California, will survey the location (X and Y coordinates) and elevation (Z coordinate) of all of the Site groundwater monitoring wells. The elevation of the well casing will be determined to within ± 0.01 feet with respect to mean sea level (MSL). Survey work will be performed in accordance with applicable standards of AB 2886. Survey data for the groundwater monitoring wells will be uploaded to Geotracker.

c. *The Groundwater section of the PPS indicates groundwater at the site may be tidally influenced. Communication at this distance would indicate nearby wells may be receptors. Also, the well survey section of the PPS does not identify Fitchburg well field, though the well field is within the survey radius. Please include Fitchburg well field information in the Preferential Pathway Study Addendum and evaluate these nearby receptors as part of the SCM.*

To help determine whether the Site wells are tidally influenced, groundwater samples collected during the next sampling event will be analyzed for salinity and total dissolved solids. With respect to the Fitchburg Well Field, Stantec was following the ACHCSA letter dated September 28, 2011, which stated that the PPS should include an evaluation of utility lines and well survey **within a ¼ mile radius**. The Fitchburg wells, destroyed in 1930, are located approximately 2,000 feet north of the Site, and were outside the required radius.

d. *Isolated storm drains are depicted on Figure 2 of the PPS. It is unclear from the figure and from the text if these features are sumps or are they connected to the subsurface drain system. Please indicate if there are subsurface drain lines, their depth and where the lines go. This can be discussed in the addendum preferential pathway study.*

The two storm drains located northwest of the Site were identified during the utility survey; however, the utility locating signal was lost due to a change in construction material (i.e. metal to PVC) and the utility locator was unable to confirm the connection to the subsurface drainage system. An alternate method of utility locating (i.e. ground penetrating radar) will be used to confirm the drainage connection.

e. *The Conclusions section of the PPS indicates the 4-inch low voltage line will be evaluated in the Site Investigation Work Plan- however, the utilities are not shown on any of the work plan figures. Please show the location 4-inch line on the work plan relative to the locations of the proposed borings.*

Stantec will include the location of the 4-inch low voltage line on the site plan in future reports showing the proposed boring locations.

4. BORING LOCATIONS

a. *The work plan states the borings will be located outward of the existing groundwater monitoring wells. One proposed boring location is shown adjacent to MW-1, inside the perimeter formed by MW-3 and MW-4. Please explain the rational for the placement of this boring. Please consider forming a transect by locating borings locations along a northerly trend west of the former tank pit. Some of your proposed boring locations already are in this general position for a portion of the transect. Please show the location of the transect in the addendum work plan.*

The rational for placement of the boring adjacent to MW-1 is to determine if first encountered groundwater in that vicinity corresponds to the static water level seen in MW-1. This information, along with the monitoring well resurveyed information will be used to better understand the reported mounding of groundwater associated with MW-1. Since a transect of borings along a northerly trend west of the former tank pit was already performed, additional borings will not be done. Results of all the previous borings and investigations conducted at the Site will be included in the SCM.

5. SITE MAPS AND AERIALS

a. *Please use an extended site map utilizing an aerial photographic base showing the facility in relation to its' immediate surrounding properties in all reports. Use the map as the base for depicting the locations of the borings, wells, and utilities.*

Stantec will extend the Site map with an aerial photograph background image to show the Site in relation to the immediate surrounding properties.

b. *Please plot the locations of the borings BH-6 through BH-9 advanced during the Caltrans site investigation performed in 2002 by Geocon Consultants, Inc (Geocon project #E8100-06-13 dated July 3, 2002) on all site maps. The locations of these previous borings may influence the proposed boring locations depicted on your work plan.*

The locations of borings BH-6 through BH-9 advanced by GeoCon in 2002 will be added to all future Site maps.

c. *Several boring and well locations for the adjacent truck facility located at 8099 S. Coliseum Drive are depicted on Figure 2 of the work plan. In addition to the boring and well locations depicted for the truck center site, please add the truck center boring location SB-21 to your Figure 2. Also verify the location of their monitoring well MW-1 prior to plotting the well location on the maps. Accurate placement of MW-1 may be useful when evaluating the groundwater data for the two sites. The ACEH case number for the adjacent facility is RO1389. Please show the locations of the boring and well in the addendum work plan.*

Once an access agreement is worked out between Caltrans and General Motors Truck Center and the next sampling event is conducted concurrently, Stantec will include the monitoring wells from the truck center site on the Caltrans Figures.

6. SOIL AND GROUNDWATER ANALYSES AND DATA PRESENTATION

a. *The work plan states soil and groundwater samples analyses will include TPH-g, BTEX, MTBE, and other fuel oxygenates by EPA Method 8260. Please identify the other fuel oxygenates to include tertiary amyl methyl ether (TAME), ethyl tertiary butyl ether (ETBE), diisopropyl ether (DIPE), and tertiary butyl alcohol (TBA), and lead scavengers ethylene dibromide (EDB) and ethylene dichloride (EDC). Please note that ethanol does not need to be included on the analyte list.*

The additional fuel oxygenates (TAME, ETBE, DIPE, and TBA) and lead scavengers (EDB and EDC) requested will be included in future groundwater monitoring events and subsurface investigations.

b*. Please depict groundwater isocontours in future groundwater monitoring reports.*

Groundwater isocontours will be included in future groundwater monitoring reports.

c. *This region of Oakland is Zone A, a "significant drinking water resource" within the East Bay Plain groundwater basin. Because of the likely presence of groundwater wells (either existing or improperly destroyed) in the vicinity, the likelihood of exposure to residual contamination could reasonably be presumed to be higher than typical for most of the East Bay Plain. At present groundwater in the area of the basin remains classified as 'MUN' (potentially suitable for municipal or domestic water supply). Groundwater beneath the subject site must be considered beneficial for these uses unless shown to be non-beneficial using criteria presented in the Basin Plan. Please adjust your evaluation to reflect this in future reports.*

Future groundwater monitoring reports, subsurface investigations, and the SCM will consider the groundwater beneath the Site to be considered "potentially suitable for municipal or domestic water supply" unless further research can prove the Site is designated as groundwater having non-beneficial use criteria in the Basin Plan.

d. *Please refrain from using colored blocks in the data tables as used in Table 2 of the Groundwater Monitoring Report.*

Color blocks will be removed from the data tables in future groundwater monitoring, subsurface investigation reports, and the SCM.

TECHINICAL REPORT REQUEST SCHEDULE

Please submit the following deliverables and technical reports to ACEH (Attention: Keith Nowell) according to the following schedule:

February 29, 2012 – GeoTracker Updates

Stantec will upload the available reports, boring logs, well construction information, and analytical data to Geotracker by the requested date of February 29, 2012; however, EDFs for the analytical data and survey data previously collected by GeoCon and PSI may be unavailable.

March 2, 2012 – Work Plan Addendum

Stantec has addressed the ACHCSA's requests related to the Work Plan in this response letter and feels that a work plan addendum is not required.

March 2, 2012 – Preferential Pathway Study Addendum

Stantec will address the ACHCSA comments regarding the additional information requested in the Preferential Pathway Study in the Site Conceptual Model that will be submitted with the results of upcoming soil and groundwater investigation. Therefore, no Preferential Pathway Study Addendum will be submitted at this time.

April 20, 2012 – First Quarter 2012 Groundwater Monitoring Report

Caltrans is currently negotiating with General Motors Truck Center (8099 S. Coliseum Drive) to arrange for a Site access agreement and to coordinate groundwater monitoring activities. If a Site access agreement is not finalized by March 16, 2012, Stantec will request a 30-day extension from the April 20, 2012 due date.

60 Days after Work Plan Approval – Site Conceptual Model with Results of Soil and Groundwater Investigation

As presented above, site activities are dependent upon the finalization of a site access agreement. If that is not in place at the time that the ACHCSA approves this response letter, Stantec will submit an extension request.

If you have any questions regarding this submittal, please contact Gary Messerotes at (408) 356-6124 extension 252.

Sincerely,

STANTEC CONSULTING SERVICES INC.

Jack C. Hardin, R.E.A.
Managing Principal

Gary P. Messerotes, P.G.
Project Manager

Attachments:

Appendix A – ACHCSA Letter dated February 3, 2012

APPENDIX A

ACHCSA LETTER DATED FEBRUARY 3, 2012

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
ALEX BRISCOE, Agency Director

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

February 3, 2012

Ray Boyer
Caltrans
111 Grand Ave.
Oakland, CA 64612

Subject: Fuel Leak Case No. RO0000225 and Geotracker Global ID T0600101696, Caltrans, 555 Hegenberger Rd., Oakland, CA 94621

Dear Mr. Boyer:

Alameda County Environmental Health (ACEH) Department has reviewed the following reports: a "Semi-annual Groundwater Monitoring Report" dated November 15, 2011, a "Preferential Pathway Study" dated December 12, 2012, and a "Work Plan for a Subsurface Investigation" work plan dated December 12, 2012. All documents were prepared by Stantec Consulting Corporation (Stantec). The scope of work presented in the work plan has not been adequately justified and cannot be approved at this time. ACEH requests that you address the following technical comments and send us a work plan addendum/revised work plan and preferential pathway study addendum as requested below.

TECHNICAL COMMENTS

1. **ELECTRONIC REPORT AND DATA UPLOAD COMPLIANCE** – A review of the case file and the State's Geotracker database indicates that the site is not in compliance. Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs, including SLIC programs. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites was required in GeoTracker. At present missing data and documents include, but may not be limited to, depth to groundwater and all bore logs. Please see Attachment 1 for limited additional details, and the state GeoTracker website for full details. ACEH requests notification of, and a list of, the documents uploaded to Geotracker. Please upload all submittals to GeoTracker as well as ACEH's ftp website by the date specified below.

2. **MONITORING WELL REHABILITATION**

   a. Prior to the groundwater monitoring episode documented in the November 15, 2011 referenced report, the groundwater monitoring wells at the site had not been sampled in the more than 5 years. ACEH requested the wells be redeveloped prior to sampling. Communications with your consultant, Stantec, confirmed the wells would be redeveloped and that ten (10) well volumes of groundwater would be removed during the course of the development process. It appears only a minimal effort was performed with one of the five wells, with no attempt to redevelop the remaining four wells. Additionally, the wells were sampled a day after the wells were purged. Poor groundwater recharged was cited as the reason. All previous groundwater monitoring/sampling events were conducted on the same day the wells were purged. The poor groundwater recharge experienced by the recent sampling event suggests the wells need to be redeveloped. Please redevelop the wells using a truck-mounted development rig before the next sampling episode. Please remove a minimum of ten (10) well volumes of groundwater during the redevelopment process. Allow a minimum of seventy-two (72) hours between well redevelopment and sampling. Include the results in the First Quarter 2012 Soil and Groundwater Investigation report.

b. The groundwater monitoring wells may be improperly secured as the November 15, 2011 report indicated the wells are in disrepair with stripped or missing well cover bolts. Please perform maintenance on the wells to adequately secure the wells.

a. REQUEST FOR COORDINATED GROUNDWATER CONTAMINANT PLUME MONITORING AND SAMPLING- ACEH is requiring that groundwater monitoring and sampling for this site be coordinated on the same day with groundwater monitoring, sampling, and reporting for the adjoining trucking facility west of the Caltrans site, at located at 8099 S. Coliseum Drive. The ACEH case number for the adjacent facility is RO1389. By copy of this letter this requirement is provided to all the referenced sites. ACEH is requiring that groundwater monitoring, sampling, and reporting continue at these sites in accordance with the schedule below. Please submit groundwater monitoring reports for the First and Third Quarter, 2012 by the dates identified below.

3. **PREFERENTIAL PATHWAY STUDY -** Several omissions were noted in the Preferential Pathway Study (PPS). Please address in the in the work plan addendum or in the Site Conceptual Model (SCM) as specified below.

a. The December 12, 2012 PPS, Site History and Previous Investigations section, does not address the concentrations of residual petroleum hydrocarbons in soil at the site nor does not address the significance of the off-site borehole locations BH-1 through BH-4 depicted adjacent to the former UST pit on Figure 2 of the PPS. Documenting the distribution of the residual hydrocarbons in soil might aid in the placement of the proposed boring locations. Please address these in the addendum work plan.

b. The PPS did not discuss the source of the apparent mounding of groundwater in the area east of MW-1 resulting in a somewhat radial flow. Please discuss how the source of the apparent mounding might be identified in the SCM.

c. The Groundwater section of the PPS indicates groundwater at the site may be tidally influenced. Communication at this distance would indicate nearby wells may be receptors. Also, the well survey section of the PPS does not identify Fitchburg well field, though the well field is within the survey radius. Please include Fitchburg well field information in the Preferential Pathway Study Addendum and evaluate these nearby receptors as part of the SCM.

d. Isolated storm drains are depicted on Figure 2 of the PPS. It is unclear from the figure and from the text if these features are sumps or are they connected to a subsurface drain system. Please indicate if there are subsurface drain lines, their depth and where the lines go. This can be discussed in the addendum preferential pathway study.

e. The Conclusion section of the PPS indicates the 4-inch low voltage line will be evaluated in the Site Investigation Work Plan- however, the utilities are not shown on any of the work plan figures. Please show the location 4-inch line on the work plan relative to the locations of the proposed borings.

a. BORING LOCATIONS- The work plan states the borings will be located outward of the existing groundwater monitoring wells. One proposed boring location is shown adjacent to MW-1, inside the perimeter formed by MW-3 and MW-4. Please explain the rational for the placement of this boring. Please consider forming a transect by locating boring locations along a northerly trend west of the former tank pit. Some of your proposed boring locations already are in this general position for a portion of the transect. Please show the location of the transect in the addendum work plan.

4. **SITE MAPS AND AERIALS**

a. Please use an extended site map utilizing an aerial photographic base showing the facility in relation to its' immediate surrounding properties in all reports. Use the map as the base for depicting the locations of the borings, wells, and utilities.

b. Please plot the locations of the borings BH-6 through BH-9 advanced during the Caltrans site investigation performed in 2002 by Geocon Consultants, Inc (Geocon project #E8100-06-13 dated July 3, 2002) on all site maps. The locations of these previous borings may influence the proposed boring locations depicted on your work plan.

c. Several boring and well locations for the adjacent truck facility located at 8099 S. Coliseum Drive are depicted on Figure 2 of the work plan. In addition to the boring and well locations depicted for the truck center site, please add the truck center site boring location SB-21 to your Figure 2. Also verify the location of their monitoring well MW-1 prior to plotting the well location on the maps. Accurate placement of MW-1 may be useful when evaluating the groundwater data for the two sites. The ACEH case number for the adjacent facility is RO1389. Please show the locations of the boring and the well in the addendum work plan.

5. SOIL AND GROUNDWATER ANALYSES AND DATA PRESENTATION

a. The work plan states soil and groundwater samples analyses will include TPH-g, BTEX, MTBE and *other fuel oxygenates* by EPA Method 8260. Please identify the other fuel oxygenates to include tertiary amyl methyl ether (TAME), ethyl tertiary butyl ether ETBE, diisopropyl ether (DIPE), and tertiary butyl alcohol (TBA), and the lead scavengers ethylene dibromide (EDB) and ethylene dichloride (EDC). Please note that ethanol does not need to be included on the analyte list.

b. Please depict groundwater isocontours in future groundwater monitoring reports.

c. This region of Oakland is in Zone A, a "significant drinking water resource" within the East Bay Plain groundwater basin. Because of the likely presence of groundwater wells (either existing or improperly destroyed) in the vicinity, the likelihood of exposure to residual contamination could reasonably be presumed to be higher than is typical for most of the East Bay Plain. At present groundwater in this area of the basin remains classified as 'MUN' (potentially suitable for municipal or domestic water supply). Groundwater beneath the subject site must be considered beneficial for these uses unless shown to be non-beneficial using criteria presented in the Basin Plan. Please adjust your evaluation to reflect this in future reports.

d. Please refrain from using colored blocks in the data tables as is used in Table 2 of the Groundwater Monitoring Report.

TECHNICAL REPORT REQUEST

Please submit the following deliverables and technical reports to ACEH (Attention: Keith Nowell) according to the following schedule:

- **February 29, 2012**- Geotracker Updates
- **March 2, 2012**- Work Plan Addendum
- **March 2, 2012**- Preferential Pathway Study Addendum
- **April 20, 2012**- First Quarter 2012 Groundwater Monitoring Report
- **60 Days after Work Plan Approval**- Site Conceptual Model with Results of Soil and Groundwater investigation

If your email address does not appear on the cover page of this notification, ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Thank you for your cooperation.

Sincerely,

Keith Nowell

Digitally signed by Keith X Nowell
DN: cn=Keith X Nowell, o, ou, email=keith.nowell@acgov.org, c=US
Date: 2012.02.03 16:21:12 -08'00'

Keith Nowell, PG, CHG
Hazardous Materials Specialist

Enclosure: Responsible Party(ies) Legal Requirements/Obligations
ACEH Electronic Report Upload (ftp) Instructions

Cc: Caltrans Hegenberger Maintenance Facility (RO0000225):

Ray Boyer (Sent via Email to: Ray.Boyer@dot.ca.gov)

Alicia Falk, Stantec Consulting Corporation, 15575 Los Gatos Boulevard Building C, Los Gatos, CA, 95032 (*Sent via E-mail to:* alicia.falk@stantec.com)

GM Truck Center (RO0001389):

Argonaut Holdings Inc. 8099 S. Coliseum Way Oakland, CA 94621

Charles Dittmar, ARCADIS (*Sent via E-mail to: Charles.dittmar@arcadis-us.com)*

Regulator Contacts:

Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (*Sent via E-mail to: lgriffin@oaklandnet.com*)

Donna Drogos, ACEH (*Sent via E-mail to donna.drogos@acgov.org*)
Keith Nowell, ACEH (*Sent via E-mail to keith.nowell@acgov.org)*
Geotracker
File

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/).

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 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 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.

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: General Transportation

Address: 3211 Wood Street

City, State, Zip: Oakland, CA 94608

Record ID #: RO0000338

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: P

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 Responsible Party	Printed Name	Date	E-mail Address