ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
ALEX BRISCOE, Director

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

NOTICE TO COMPLY

November 4, 2010

Mr. Kent Nelson
San Francisco Public Utilities Commission
1000 El Camino Real
Millbrae, CA 94030

Subject: Notice to Comply for Fuel Leak Case No. RO0000340 and GeoTracker Global ID T0600101172, SFWD Sunol Yard, 505 Paloma Way, Sunol, CA 94586

Dear Mr. Nelson:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site. In correspondence dated October 13, 2006, ACEH requested additional information in order review the case for possible case closure. To date, we have received correspondence dated October 15, 2008 indicating that analytical data and monitoring well survey data had been uploaded to GeoTracker; however we have not received the information necessary to review this case for possible closure. Therefore, we are issuing this Notice to Comply to establish a schedule for obtaining this information and moving this case forward. If we do not receive the requested information **by February 10, 2011**, a Notice of Violation will be issued.

The case includes fuel and chemical releases from three separate areas of the San Francisco Public Utilities Commission (SFPUC) Sunol facilities:

- Sunol Pump Station. Three underground storage tanks (USTs), consisting of one 10,000-gallon diesel UST and two 400-gallon waste oil USTs, were removed from the Sunol Pump Station in November 1993. Total petroleum hydrocarbons as diesel (TPHd), oil and grease, and semi-volatile organic compounds (SVOCs) were detected in soil samples collected from the tank excavations.
- Sunol Maintenance Yard. Three USTs, consisting of one 550-gallon regular gasoline UST, one 1,000-gallon unleaded gasoline UST, and one550-gallon diesel UST, were removed from the southern portion of the Sunol Maintenance Yard in May 1990. Total petroleum hydrocarbons as gasoline (TPHg), TPHd, and BTEX were detected in soil samples collected from the tank excavations.
- Sunol Maintenance Yard. An unlined sump near the southeast corner of a storage shed in the Sunol Maintenance Yard was reportedly used for disposal of waste oil and other liquids. The storage shed was located approximately 50 feet southwest of the three USTs in the Maintenance Yard. Total recoverable hydrocarbons, oil and grease, volatile organic compounds (VOCs), and metals were detected in soil samples collected from the spill area.

In order to complete our review of this case for possible case closure, we request that you provide the additional information requested in the technical comments below. Therefore, we request that you address the following technical comments in a Site Summary Report **by February 10, 2011**.

TECHNICAL COMMENTS

1. **Sunol Filtration Galleries.** A report entitled, "Groundwater Monitoring Well Sampling at Sunol Water Department Facility," dated March 18, 1992, and prepared by Crosby & Overton, Inc. reports that, "the largest extraction of groundwater in the Sunol subbasin is within one quarter mile of the site at the Sunol filter galleries, which lie approximately 15 feet below ground surface." We request that you provide a map showing the location of the Sunol filter galleries in relation to the three areas where releases have occurred. In addition, please provide a description of the volume and duration of groundwater extraction from the Sunol filter galleries, the depth, configuration and elevation of the galleries, and any available information on groundwater flow velocities and vertical hydraulic gradients in this area of the Sunol subbasin. Please use this information to evaluate the potential for the galleries to be receptors for releases from the fuel leak sites. Present your evaluation in the Site Summary Report requested below.

2. **Detailed Well Survey.** ACEH requests that you locate all wells (monitoring and production wells: active, inactive, standby, decommissioned, abandoned and dewatering, drainage and cathodic protection wells) within 2,000 feet of the subject site. Well locations are to be shown on a map or aerial photograph of the site with a scale. Well construction details are to be listed in an accompanying table and are to include the well designation, location, total depth, diameter, screen or perforated interval, date of well installation, current status, historic use, owner of the wells, and other well construction details that may be relevant. As part of your detailed well survey, please perform a background study of the historical land uses of the site and properties in the vicinity of the site. Use the results of your background study to determine the existence of unrecorded/unknown (abandoned) wells, which can act as pathways for migration of contamination at and/or from your site. Please review historical sources such as Sanborn maps, aerial photos, etc., when performing the background study. Include appropriate photographic prints, in stereo pairs, of historic aerial photos used as part of your study. We also request that you list by date all aerial photographs available for the site from the aerial survey company or library you use during your study. Please refer to the Regional Board's guidance for identification, location, and evaluation of potential deep well conduits when conducting your preferential pathway study. We recommend that you obtain well information from both the Zone 7 Water Agency and the State of California Department of Water Resources. Two water wells, reportedly installed by the Alameda County Water District for measuring water levels and analyzing groundwater samples for pesticides, are within approximately 80 to 300 feet of the Sunol Maintenance Yard. A map showing the locations of the two wells is included as Attachment A to this correspondence. Please include discussion of the status (active, inactive, or decommissioned) and details of well construction in the requested Well Survey. In addition, please research whether any groundwater samples collected from these wells have been analyzed for petroleum hydrocarbons, VOCs, metals, or other potential chemicals of concern (COCs).

3. **Soil Contamination Beneath Storage Shed.** In November 1989, contaminated soil was excavated from the southeast corner of a storage shed located in the Sunol Maintenance Yard, where San Francisco Water Department personnel reportedly disposed of waste oil and solvents onto the ground. Analysis of soil samples indicated the presence of total oil and grease (TOG) at concentrations up to 31,000 ppm, various VOCs at concentrations ranging from 0.3 to 3.2 ppm, and elevated concentrations of metals. The excavation was extended to a depth of 7.5 feet below grade at the lowest point of the excavation. Confirmation soil samples collected at the base of the excavation contained total recoverable hydrocarbons at concentrations of 120 to 150 ppm. In addition, the excavation could not be extended beneath the concrete foundation of the shed. Elevated concentrations of TOG and potential VOCs were left in place beneath the shed. The report presenting the results of the removal and confirmation sampling ("Removal of Oil and Grease Contaminated Soils and Confirmation Sampling and Analysis at the Sunol Facility," American Environmental Management Corporation, January 4, 1990) concluded, "The area under the existing storage shed still has high concentrations of oil and grease as well as potential VOCs and should be removed. It [is] my understanding that the storage shed is scheduled for removal sometime in 1990 and that the SFDPH will remove the contaminated soil at that time." A work plan to conduct sampling in the area of the storage shed was submitted on March 12, 2002 (Work Plan for Soil and Groundwater Sampling, Sunol Maintenance Yard, Weiss Associates, March 13, 2002). On August 22, 2002, a soil boring was advanced beneath the shed to a depth of 20 feet below grade. The boring originated 3 feet from the shed and was angled at 14 degrees to terminate 20 feet below the shed. TPHd was detected in soil samples from the boring at concentrations of 1.3 to 3.1 milligrams per kilogram (mg/kg) but TPHd was not detected in one grab groundwater sample collected from the boring. Oil and grease, TPHg, BTEX, MTBE, and VOCs were not detected in the soil or groundwater samples from the angled boring. Based on the absence of COCs in groundwater and minimal levels of TPHd detected in soil beneath the shed, the report recommended that ACEH consider case closure. Please confirm whether residual contamination below the shed was left in place, the current use of this area, any future plans for this area. If the residual contamination remains in place, please evaluate the potential for current and future exposure to the COCs through direct exposure, leaching, and vapor intrusion. This information is to be presented in the Site Summary Report requested below.

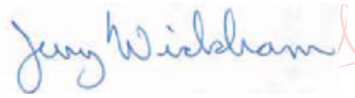
TECHNICAL REPORT REQUEST

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

- **February 10, 2011 –** Site Summary Report including a Detailed Well Survey

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, 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

Attachment A: Figure 3 of the report entitled, "Groundwater Monitoring Well Sampling at Sunol Water Department Facility," dated March 18, 1992," and prepared by Crosby and Overton, Inc.

Attachment: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

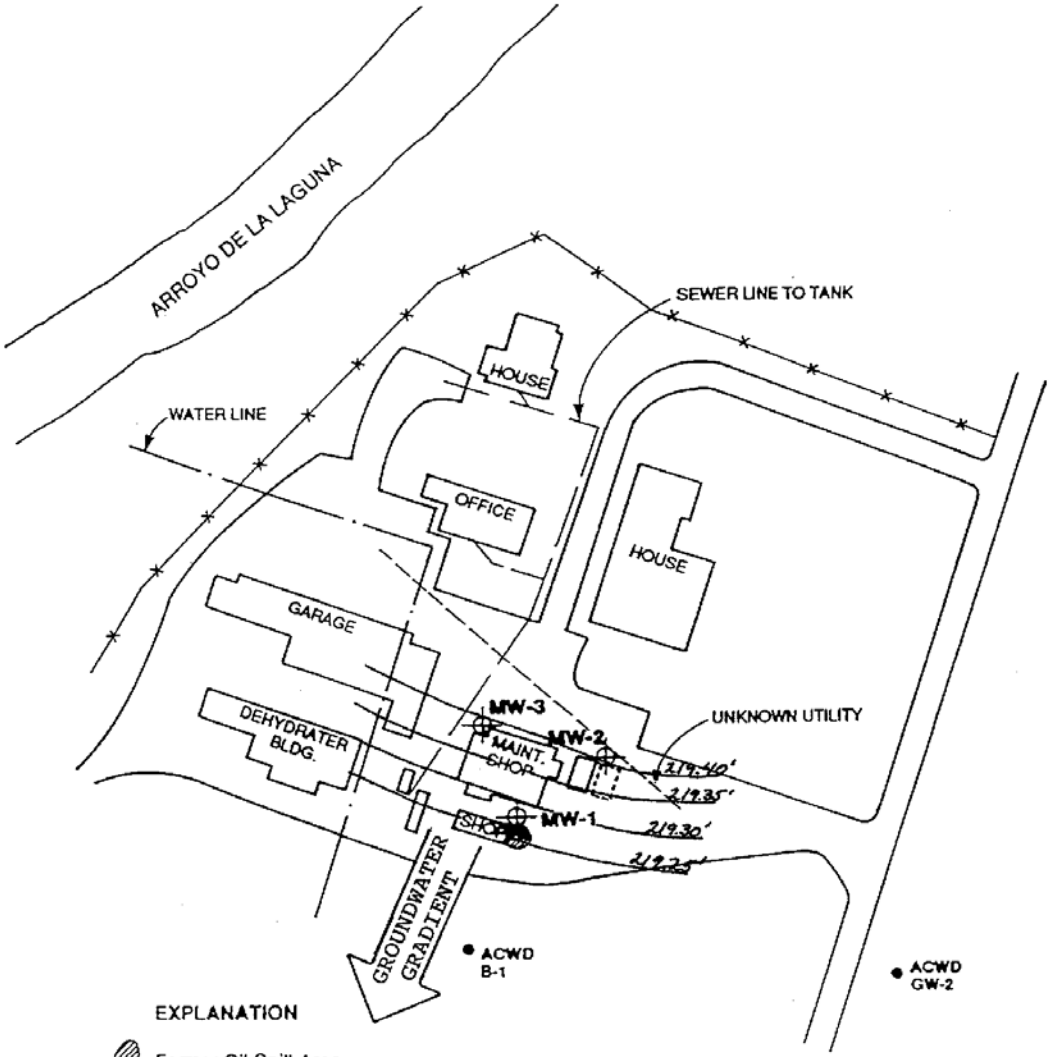
cc: Cheryl Dizon (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551 (Sent via E-mail to: cdizon@zone7water.com)

Joe Naras, San Francisco Public Utilities Commission, Natural Resources Division, 1657 Rollins Road, Burlingame, CA 94010

Craig Freeman, San Francisco Public Utilities Commission, Environmental and Regulatory Compliance Division, 1145 Market Street, Suite 500, San Francisco, CA 94103 (*Sent via E-mail to: CFreeman@sfwater.org*)

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



CROSBY & OVERTON, INC.

FIGURE 3
GROUNDWATER GRADIENT
AND POTENTIOMETRIC SURFACE

DATE: 3-16-92 JOB NUMBER: 9423-S DRAWN BY: after HLA 10/90

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.