



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

April 23, 2012

Ms. Rita Sullins
Don Sul, Inc.
187 North L Street
Livermore, CA 94550

Ms. Jennifer Sedlacheck (*Sent via E-mail to: jennifer.c.sedlachek@exxonmobil.com*)
Exxon Mobil
4096 Piedmont, #194
Oakland, CA 94611

Subject: Case File Review for Fuel Leak Case No. RO0000394 and GeoTracker Global ID T0600100116, Arrow Rentals, 187 North L Street, Livermore, CA 94550

Dear Ms. Sullins and Ms. Sedlacheck:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including correspondence from Geologic Technics Inc. dated February 9, 2012. The February 9, 2012 correspondence indicates that a dual-phase extraction (DPE) remediation system which operated from November 15, 2011 to February 1, 2012, has been shut down due to limited budget available from the Underground Storage Tank Cleanup Fund (USTCF). We have been in contact with the USTCF and find that some funds are remaining for this case during the current fiscal year which ends June 30, 2012. In addition, please note that the requirements for site cleanup are not contingent upon funding availability from the USTCF.

Please assure that you have taken all steps to assure optimal funding from the USTCF. No later than June 8, 2012, we request that you submit a schedule for re-starting and operating the DPE system.

TECHNICAL REPORT REQUEST

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

- **June 8, 2012** – Detailed Project Schedule for DPE Operation

Responsible Parties
RO0000394
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If you have any questions, please call me at 510-567-6791 or send me an electronic mail message at jerry.wickham@acgov.org. Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. 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.

Sincerely,

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

Attachments: Correspondence from Geological Technics, Inc. dated February 9, 2012
Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Danielle Stefani, Livermore Pleasanton Fire Department, 3560 Nevada St, Pleasanton, CA 94566
(Sent via E-mail to: dstefani@lpfire.org)

Colleen Winey (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551
(Sent via E-mail to: cwiney@zone7water.com)

Eric Uranga, City of Livermore, Economic Development, 1052 S. Livermore Ave., Livermore, CA 94550 (Sent via E-mail to: ejuranga@ci.livermore.ca.us)

Raynold I. Kablanow II, Geological Technics, Inc., 1172 Kansas Avenue, Stockton, CA 95351 (Sent via E-mail to: gti@gtienv.com)

Jenny Weese, Geological Technics, Inc., 1172 Kansas Avenue, Stockton, CA 95351 (Sent via E-mail to: jennyw@gtienv.com)

Heidi Timken, Timken, Johnson, Hwang, 1931 San Miguel Drive, Suite 100, Walnut Creek, CA 94596

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, eFile

Geological Technics Inc.

1172 Kansas Avenue
Modesto, CA 95351
209.522.4119
209.522.4227 (fax)
gti@gtienv.com

February 9, 2012

Project No.: 1262.2
Project Name: Sullins (L St.)

Jerry Wickham
Hazardous Materials Specialist
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

RE: Arrow Rentals Service
187 North L Street
Livermore, CA 94550

Dear Mr. Wickham:

The purpose of this correspondence is to respectfully inform you that due to budgetary constraints, the dual phase extraction (DPE) remediation system at the above site has been shutdown. With the current status of the USTCF and the limited budget, the funds are not available to continue operation and maintenance of the system and it will have to be shut down until more funds are available.

The DPE system performed remediation for a total of 1,148 hours between November 15th, 2011 and February 1st, 2012, when the system was shut down to implement a cost savings pulse mode operation. However, this past week we have been adding up operation and maintenance costs and realized the project is too low on funds to continue operation.

The site has been experiencing a historically low groundwater elevation, approximately 18 feet below the historical high groundwater elevation, allowing for extensive remediation of the vadose zone. PID data from the system's vapor stream have ranged from <1,000 to 6,800 ppm, with laboratory data ranging from 2,380 to 3,360 mg/m³ of TPH-g. Laboratory data of the groundwater removed during remediation has ranged from 2,400 to 6,400 µg/L of TPH-g.

GTI submitted a change order to the USTCF on November 14th, 2011 requesting more funds to continue operating the sites remediation system. Based on inquires to the Fund, the change order is currently in review and it is unknown if and when it will be granted. GTI respectfully requests if you have any influence with the USTCF, can you assist the Sullins in acquiring further funding to continue operating the DPE system through the remainder of the fiscal year, when a new budget will be allocated.

Please contact me at (209) 522-4119 should you have any questions or need more information.

Thank you,

Raynold Kablanow II, Ph.D.

cc. Tony & Rita Sullins
Chris Davidson – City of Livermore



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.