

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**  
AGENCY  
ALEX BRISCOE, Director



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

March 22, 2012

Mr. Melvin Siegel (*Sent via E-mail to: [melvin.siegel@saralee.com](mailto:melvin.siegel@saralee.com)*)  
Environmental Manager  
Earthgrains Baking Companies, Inc.  
955 Kennedy Street  
Oakland, CA 94606

Subject: Post Remedial Sampling For Fuel Leak Case No. RO0002569 and GeoTracker Global ID T0600177342, Earthgrains Baking Company, Inc., 955 Kennedy Street, Oakland, California, 94606

Dear Mr. Siegel:

Thank you for the recently submitted document entitled, "Case Closure Request Report," dated October 31, 2011, which was prepared by PSC Industrial Outsourcing, LP (PSC) for the subject site. Alameda County Environmental Health (ACEH) staff has reviewed the case file including the above-mentioned report for the above-referenced site. It is stated in the above-mentioned report that in lieu of preparing a work plan to obtain representative post remediation verification data necessary for case closure, PSC consulted with the State Water Resources Control Board on strategies to petition closure without performing the required verification monitoring per California Code of Regulations, Title 23, Division 3, Chapter 16, Article 11, Section 2727. Based on guidance from the State Board, PSC has submitted this separate closure request in order to receive case closure denial from ACEH so that the petition process can be initiated. It is unfortunate that these actions are now being considered as this case has successfully progressed through site characterization and remediation and has now stalled in the final phase, post remediation verification monitoring. Please be reminded that in March 2008, it was ACEH that informed Earthgrains that although an excavation work plan was submitted, preparation of a Feasibility Study/Corrective Action Plan would be necessary to justify the remediation alternative (excavation) and qualify for potential remediation cost reimbursement from the State UST Cleanup Fund, illustrating ACEH's genuine desire to progress this case to closure in an unbiased and cost-effective manner for all parties involved. And as such, ACEH will review the case for closure once representative post remediation verification monitoring has been conducted.

The rationale for case closure presented in the report has not been adequately justified and cannot be approved at this time, as post remediation verification sampling is incomplete. ACEH requests that you address the following technical comments and send us a work plan as requested below.

## **TECHNICAL COMMENTS**

1. **Post Remediation Sampling** – In our June 2, 2011 correspondence, ACEH stated that post remediation groundwater sampling is necessary in order to evaluate remediation effectiveness and requested a work plan. Since the zone of contamination that was remediated was shallow, groundwater monitoring wells must be installed with screened intervals that intersect this shallow zone only, and do not exhibit submerged screens. Monitoring well should be installed in locations within the source area(s) and down-gradient to adequately monitor the contaminant plume.

During our September 1, 2011 conference call, it was agreed that permanent groundwater monitoring wells may be not necessary provided that PSC obtain representative groundwater data from temporary borings. As such, ACEH was under the impression that a work plan was forthcoming.

In the above mentioned closure report, PSC states that “[g]roundwater in the shallow permeable zone is hydraulically connected to the permeable zone encountered in the screened interval of the surrounding monitoring wells and is representative of shallow groundwater quality beneath the site.” However in contrast to PSC’s September 17, 2009 “Tier 1 Risk Assessment and No Further Action Request Report,” PSC refers to the shallow water-bearing unit as “perched,” which includes areas where the former USTs were located. According to PSC in their Corrective Action Completion Report, “[t]his pump test indicated that there is a limited hydraulic connection between the groundwater in the former excavation and the groundwater encountered in the monitoring wells.” Therefore, PSC’s statement that “the shallow permeable zone is hydraulically connected to the permeable zone encountered in the screened interval of the surrounding monitoring wells and is representative of shallow groundwater quality beneath the site” does not appear adequately justified.

Please note that demonstrating plume stability, as well as demonstrating that concentrations of contaminants will ultimately achieve cleanup goals, are some of the criteria necessary to achieve case closure consideration. Since the shallow soil, which included the depths of the shallow water-bearing unit was remediated, it is only logical that this would be the zone from which verification soil and groundwater data is collected and monitoring well(s) would be installed. In our December 12, 2008 correspondence (enclosed), ACEH explicitly stated that the proposed monitoring wells should be installed to evaluate the shallow, first encountered water-bearing zone at the site. However, this information was ignored and the monitoring wells were installed intersecting a deeper water-bearing zone, which exhibited much lower petroleum hydrocarbon concentrations, as expected. It would appear that with the knowledge that the shallow water-bearing zone was significantly impacted with petroleum hydrocarbons, PSC should have installed monitoring wells in this shallow water-bearing zone to obtain verification monitoring data representative of the target zone.

ACEH respectfully requests that Earthgrains review this and the enclosed correspondences and submit a brief work plan to collect post-remediation verification groundwater data necessary for case closure evaluation. Please submit the work plan by the date specified below.

**TECHNICAL REPORT REQUEST**

Please submit technical reports to ACEH (Attention: Paresh Khatri), according to the following schedule:

- **April 27, 2012** – Soil and Water Investigation Work (Post Remediation Sampling Work Plan)

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 777-2478 or send me an electronic mail message at [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org).

Sincerely,

Paresh C. Khatri  
Sr. Hazardous Materials Specialist

Enclosure: ACEH March 4, 2008 Correspondence  
ACEH December 12, 2008 Correspondence  
Responsible Party(ies) Legal Requirements/Obligations  
ACEH Electronic Report Upload (ftp) Instructions

cc: John Carrow, PSC Environmental Services, 210 West Sand Bank Road, Columbia, Illinois,  
62236 (*Sent via E-mail to: [JCarrow@pscnow.com](mailto:JCarrow@pscnow.com)*)  
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA  
94612-2032 (*Sent via E-mail to: [lgriffin@oaklandnet.com](mailto:lgriffin@oaklandnet.com)*)  
Donna Drogos, ACEH (*Sent via E-mail to: [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org)*)  
Paresh Khatri, ACEH (*Sent via E-mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org)*)  
GeoTracker  
File

## 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](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.

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

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

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ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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(510) 567-6700  
FAX (510) 337-9335

March 4, 2008

Mr. Melvin Siegel  
Environmental Manager  
Earthgrains Baking Companies, Inc.  
955 Kennedy Street  
Oakland, CA 94606

Subject: Over-excavation at Fuel Leak Case No. RO0002569 and GeoTracker Global ID  
T0600177342, Earthgrains Baking Company, Inc., 955 Kennedy Street, Oakland,  
California, 94606

Dear Mr. Siegel:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Remedial Investigation Report," dated May 17, 2007, and the "Source Removal Work Plan Addendum," dated September 5, 2007, both prepared by PSC Environmental Services and ETIC Engineering for the subject site.

ACEH generally concurs with the proposed scope of work and requests that you note the following technical comments, perform the proposed work, and send us the technical report described below.

**TECHNICAL COMMENTS**

In the September 5, 2007, "Source Removal Work Plan Addendum," ETIC Engineering stated that Sara Lee Bakery Group Inc. (parent company to Earthgrains Baking Companies, Inc.) has indicated that California Underground Storage Tank (UST) Fund reimbursement is "another important factor in performing any corrective action." Please be aware the site characterization and/or site cleanup is not contingent upon receiving reimbursement monies from the UST Cleanup Fund. A Feasibility Study, prepared in accordance with California Code of Regulations, Title 23, Division 3, Chapter 16, §2725(f), which evaluates cost effective remedial approaches having likelihood of attaining site cleanup objectives has not been submitted. The UST Cleanup Fund typically reimburses costs associated with the most cost-effective remedial alternative. Since it has not been determined that over-excavation is the most cost-effective remedial approach, the UST Cleanup Fund may not fully reimburse all costs associated with the proposed over-excavation. Please contact the UST Cleanup Fund to address cost reimbursement concerns.

### TECHNICAL REPORT REQUEST

Please complete the proposed fieldwork and submit technical reports to Alameda County Environmental Health (Attention: Paresh Khatri), according to the following schedule:

- **April 29, 2008** – Complete over-excavation activities
- **June 24, 2008** – Submit Excavation 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

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

### 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**

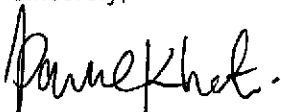
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

**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.

If you have any questions, please call me at (510) 777-2478 or send me an electronic mail message at Paresh.Khatri@acgov.org.

Sincerely,



Paresh C. Khatri  
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Scott Jander, PSC Environmental Services, 210 West Sand Bank Road, Columbia,  
Illinois, 62236  
Thomas Neely, ETIC Engineering, 2285 Morello Ave, Pleasant Hill, CA 94523  
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland,  
CA 94612-2032  
Donna Drogos, ACEH  
Paresh Khatri, ACEH  
File





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

December 12, 2008

Mr. Melvin Siegel  
Environmental Manager  
Earthgrains Baking Companies, Inc.  
955 Kennedy Street  
Oakland, CA 94606

Subject: Over-excavation at Fuel Leak Case No. RO0002569 and GeoTracker Global ID  
T0600177342, Earthgrains Baking Company, Inc., 955 Kennedy Street, Oakland,  
California, 94606

Dear Mr. Siegel:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Groundwater-Monitoring Well Installation Plan," dated November 18, 2008, which was prepared by PSC Industrial Outsourcing, LP (PSC) for the subject site. PSC proposes to install four groundwater monitoring wells and one dewatering well at the site. The purpose of the dewatering well would be twofold in that the monitoring wells will aid in assessing groundwater quality beneath the site and provide data for limited source removal activities at the site.

ACEH generally concurs with the proposed scope of work and requests that you address the following technical comments and send us the work plan addendum described below

#### **TECHNICAL COMMENTS**

1. **Hydrogeologic Setting and Monitoring Well Installation** – PSC proposes to install four 2-inch diameter groundwater monitoring wells at the site drilled to an approximate total depth of 25 to 30 feet below the ground surface (bgs) to intersect the well-graded gravelly sand and silty sand encountered at a depth of approximately 18 to 25 feet bgs with 10 feet of screen in the bottom. Static depth to groundwater at the site has been measured at approximately 10 bgs. A review of depth to groundwater data at nearby sites located within a mile north of the subject site verified that groundwater is encountered at shallow depths ranging from approximately 3 to 9 feet bgs. At a former LOP case located at 2100 Livingston Street in Oakland, groundwater was reported between 6.5 to 9.3 feet bgs. At another former LOP case located at 1441 Embarcadero, depth to groundwater ranged from 2.65 to 9.33 feet bgs in site groundwater monitoring wells screen to a maximum depth of 15 feet bgs. Therefore, the proposed depths of the site groundwater monitoring wells may not intersect the first water bearing zone, but rather a second water bearing zone. Based on site soil and groundwater analytical data, it appears that the first and second groundwater zones are impacted with petroleum hydrocarbons and that monitoring wells capable of sampling at discrete, distinct depths are appropriate. Please propose a scope of work to address the above mentioned

concerns and submit a work plan addendum due by the date specified below or sooner if possible.

### **TECHNICAL REPORT REQUEST**

Please submit technical reports to ACEH (Attention: Paresh Khatri), according to the following schedule:

- **February 10, 2009** – Soil and Water Investigation Work Plan Addendum

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](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

Mr. Siegel  
RO0002569  
December 12, 2008, Page 3

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**

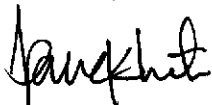
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

#### **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.

If you have any questions, please call me at (510) 777-2478 or send me an electronic mail message at [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org).

Sincerely,



Paresh C. Khatri  
Hazardous Materials Specialist



Donna L. Drogos, PE  
Supervising Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: John Carrow, PSC Environmental Services, 210 West Sand Bank Road, Columbia, Illinois, 62236  
Scott Jander, PSC Environmental Services, 210 West Sand Bank Road, Columbia, Illinois, 62236  
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA  
94612-2032  
Donna Drogos, ACEH  
Paresh Khatri, ACEH  
File

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>ISSUE DATE:</b> July 5, 2005
	<b>REVISION DATE:</b> December 16, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, 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](mailto:dehloptoxic@acgov.org)  
or
    - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
  - 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](mailto: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 at acgov.org. (e.g., [firstname.lastname@acgov.org](mailto: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)