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Alameda County
Environmental Health

APRIL 5, 2010

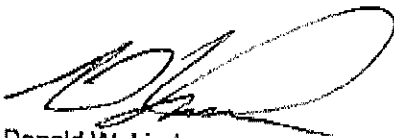
Mr. Jerry Wickham
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Re: **Perjury Statement-**
Revised Sub-Slab Attenuation Factor Determination Work Plan
Searway Property (SLIC Case No. RO0002584)
649 Pacific Avenue
Alameda, California

Dear Mr. Jerry Wickham,

"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."

Timber Dell Properties, LLC



Donald W. Lindsey, member



April 5, 2010
Project 103.001.001

Mr. Jerry Wickham
Hazardous Materials Specialist
Alameda County Environmental Health Department
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-5577

Re: *Revised Sub-Slab Attenuation Factor Determination Work Plan*
Searway Property
649 Pacific Avenue
Alameda, California

Dear Mr. Wickham:

This letter, prepared by Trinity Source Group, Inc. (Trinity) on behalf of Timber Del Properties, LLC, presents a *Revised Sub-Slab Attenuation Factor Determination Work Plan (Revised Work Plan)* to determine a site-specific attenuation factor (AF) for the slab foundation of the building at 649 Pacific Avenue in Alameda, California (Figures 1 and 2). The attenuation factor is used to evaluate vapor intrusion pathways from sub-slab materials to indoor air.

This *Revised Work Plan* addresses comments in a February 18, 2010 letter from the Alameda County Health Care Services Agency (ACHCSA), regarding the *Sub-Slab Attenuation Factor Determination Work Plan* submitted on January 7, 2010 by Trinity. The ACHCSA letter is included in Attachment A. In response to the ACHCSA comments, the scope of work has been modified as described below, and additional discussion of procedures is provided.

Radon gas measurements will be used to determine the site-specific attenuation factor (AF), following the methods described by McHugh, et al. (2008).¹ This reference article notes that many studies indicate that radon is a sensitive tracer for the movement of soil gas across a building foundation. In contrast, volatile organic compounds (VOCs) are not considered to be a suitable tracer gas, because typical indoor settings often have multiple potential sources of VOCs which may result in false positive analytical results for indoor air.

BACKGROUND

A Sub-Slab Vapor Depressurization System (SSVD) was installed and operated at the subject site following sub-slab vapor testing performed during 2007, which indicated elevated concentrations of

¹ McHugh, Thomas E., Hammond, Douglas E., Nickels, Tim, and Hartman, Blayne, "Use of Radon Measurements for Evaluation of Volatile Organic Compound (VOC) Vapor Intrusion," *Environmental Forensics*, 9:107-114, 2008. <http://dx.doi.org/10.1080/15275920801888491>

volatile organic compounds (VOCs) in the sub-slab vapor. The SSVD was designed, permitted and installed during July and August 2008, and started operation in September 2008. The site layout and SSVD components are shown on Figure 2.

The SSVD system includes two horizontal sub-slab extraction wells, with pipe runs trenched to nearby walls. The pipe runs continue up to the first floor ceiling, where they are manifolded together and connected to an exhaust fan equipped with a flow meter, then discharged through the roof and a 3-foot stack.

The SSVD has discharged a total of approximately 5.54 pounds of VOCs from start-up through November 6, 2009 after 422 days of operation. The VOC removal rate for 2009 ranged from approximately 0.005 pound per day to 0.02 pounds per day.

The SSVD is performing as expected with the removal of VOCs and depressurization of the sub-slab area.

In order to terminate the SSVD operation and pursue site closure, indoor air VOC concentrations must be below applicable indoor air screening levels². The indoor air concentrations are determined by multiplying the sub-slab concentrations of specific VOCs by an AF. The default AF prescribed by the California Department of Toxic Substances Control (DTSC) is 0.01.

The most recent SSVD effluent concentrations (August 7, 2009 and November 6, 2009) had VOC and Stoddard solvent concentrations higher than most previous influent data for the system, as shown on Table 1. Therefore, Trinity recommends continued operation of the SSVD until VOC and Stoddard solvent concentrations decline, and then collecting individual sub-slab vapor samples for closure evaluation using the AF determined by implementing this *Revised Work Plan*.

DETERMINATION OF SITE-SPECIFIC AF USING RADON

A site-specific AF can be determined by comparing sub-slab and indoor concentrations of a tracer gas. Radon has been used as such a tracer gas, because it is naturally-occurring, detectable in most locations, and indoor sources of radon are typically not present.

As described by McHugh, et al., in the previously-referenced article, the AF is determined “as the ratio of the measured concentration of the chemical of concern in indoor air (C_b ; corrected by subtracting the ambient air concentration) divided by the measured concentration of the chemical in soil gas (C_s ; i.e., $AF=C_b/C_s$).”

Accordingly, the following scope of work calls for collecting and analyzing samples of sub-slab gas, indoor air, and ambient air, in order to determine C_b and C_s . These results will be used to calculate the site-specific AF.

² Screening for Environmental Concerns at Sites With Contaminated Soil and Groundwater (November 2007, updated May 2008), San Francisco Bay Regional Water Quality Control Board, California EPA, <http://www.waterboards.ca.gov/sanfranciscobay/esl.htm>.

The original *Work Plan* included sampling for VOCs and Stoddard solvent, in addition to radon. However, the VOC and Stoddard analyses would not be used in the determination of the AF. Therefore, this *Revised Work Plan* eliminates the sampling for VOCs and Stoddard solvent, and just provides the method and rationale for the radon sampling and development of the site-specific AF. The AF will be applied to VOC and Stoddard solvent concentrations determined from sub-slab probe sampling after VOC concentrations decline in the future.

DISCUSSION IN RESPONSE TO SELECTED ACHCSA COMMENTS

The scope of work for this AF determination has been modified based on the comments from ACHCSA. The following paragraphs discuss specific ACHCSA comments which are not addressed in the Scope of Work described below.

Comment #3 requested that indoor and outdoor air samples be analyzed for VOCs and Stoddard solvent. Trinity has discussed this request with ACHCSA, and understands that the reason for this request is that VOC and Stoddard solvent analytical results from the sub-slab and indoor samples could be used to validate the AF determined using radon concentrations. Trinity initially recommended VOC and Stoddard solvent analysis in selected sub-slab probes to validate that these locations continue to have elevated concentrations of these compounds, and for preliminary closure evaluation. However, as noted above, the VOC and Stoddard solvent data collected during this investigation would not have been applicable to the AF determination, and has been eliminated from this proposed scope of work. Once the AF is determined using radon concentrations, the AF will be applied to sub-slab samples collected and analyzed following the methods used in previous assessments (Summa canisters and TO-15, etc.).

Trinity respectfully disagrees with the request for indoor and outdoor samples to be analyzed for VOCs and Stoddard solvent, because indoor air sampling for VOCs can be complicated by numerous common indoor sources of VOCs, particularly in a paint store. McHugh, *et al.*, (2008) notes that “direct measurement of VOC concentrations in indoor air is often not an effective method for identifying vapor intrusion impacts.” The California Department of Toxic Substances Control (DTSC)³ describes challenges presented by indoor air sampling to determine vapor intrusion, including presence of ambient pollution and consumer products. If VOCs are detected, the significance of the data would be questionable. The building use as a paint store presents significant VOC sources; even the restaurant occupying the remainder of the area studied contains VOC sources with the presence of cleaning and disinfecting products, carpeting and upholstery that may off-gas VOCs, and gas stoves. Therefore, Trinity recommends that indoor and outdoor air samples not be analyzed for VOCs and Stoddard solvent, simply to avoid the possibility of false positive readings and the complications presented in interpreting the data.

ACHCSA Comment #5 requested additional discussion of the methods that will be used to assure that the indoor air samples collected will be representative of typical exposure and that the factors affecting indoor

³ DTSC, “*Interim Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air*,” December 15, 2004, revised February 7, 2005.

air quality have been considered. USEPA⁴ has provided guidance regarding indoor radon sampling with the following conditions recommended:

- For short-term measurements, closed-building conditions should be maintained for 12 hours prior to and during the measurement period. Normal entrance and exit are acceptable, but external doors should not be left open for more than a few minutes.
- Internal-external air exchange systems (other than a furnace) such as high-volume attic and window fans should not be operating during measurements and for at least 12 hours before measurements are initiated. Air conditioning systems that recycle interior air may be operating. Normal operation of permanently installed air-to-air heat exchangers may also continue during closed-building conditions.
- Short-term tests lasting just two or three days should not be conducted if severe storms with high winds (e.g., >30 mph) or rapidly changing barometric pressure are predicted during the measurement period. Weather predictions available on local news stations can provide sufficient information to determine if these conditions are likely.

Trinity is incorporating these considerations into the scope of work.

ACHCSA Comment #6 requested continued semi-annual groundwater monitoring and reporting. Trinity will continue monitoring and reporting according to the schedule provided by ACHCSA.

SCOPE OF WORK

The scope of work to be performed will consist of the following work tasks:

- Trinity will conduct a pre-sampling building inspection to determine the typical HVAC operations, and work with the building tenants to maintain building closure conditions including HVAC operation or non-operation consistent with the USEPA guidance above. The inspection will also endeavor to identify other factors affecting indoor air sampling, and will modify the sampling protocol as appropriate.
- Trinity will turn off the SSVD seven days prior to sub-slab vapor and indoor air testing to allow sub-slab vapor and indoor radon concentrations to equilibrate.
- Trinity will notify the site tenants (Kelly Moore Paints and East Ocean Seafood Restaurant) at least 48 hours before sampling.
- Seven days after SSVD shutdown, four sub-slab vapor points (VS-3, VS-10, VS-11 and VS-13) will be sampled for radon. Probe VS-11 was added at the request of ACHCSA. These locations were selected to sample various areas within the building, both inside and outside the existing VOC plume. Proposed sampling locations are shown on Figure 2.

During the same sampling event, indoor air samples for radon analysis will be collected in the Kelly Moore Paint store at 649 Pacific Avenue, in the East Ocean Seafood Restaurant at

⁴ USEPA, *ibid.*

1713 Webster Street, and in the Kelly Moore Paint storage facility at 651 Pacific Avenue. These sample locations were selected to sample various rooms inside the building, while staying out of closets, walkways, and pathways of air current blowing between doorways. These three indoor air samples will provide a larger data set for determination of the AF in lieu of time-weighted sampling which is not practical for sub-slab samples as described below. Proposed sampling locations are shown on Figure 2.

As requested by ACHCSA Comment #1, an indoor air sample for radon analysis will be collected from a location near VS-11. However, the USEPA guidance⁵ recommends against indoor-air radon sampling in closets, bathrooms and kitchens, so the indoor air sample near VS-11 will be located in the East Ocean Seafood Restaurant dining room, generally between sub-slab Probes VS-11 and VS-10. This location will also be subject to the pre-sampling inspection and closed-building conditions described in the referenced guidance and discussed below under Sampling Procedures.

- During the same event, an outdoor ambient air sample will be collected in the parking lot area for radon analysis.
- Samples will be shipped to the University of Southern California Department of Geosciences laboratory for radon analysis.
- The SSVD system will be restarted after sample collection.
- The AF will be calculated using the radon analytical results as follows:
 - The four sub-slab sample results will be averaged to determine the Cs, soil gas radon concentration.
 - The three indoor radon concentrations will be averaged to determine the average indoor radon concentration.
 - The ambient sample radon concentration will be subtracted from the average indoor radon concentration, to determine the Cb, the corrected indoor air radon concentration.
 - The AF will be determined by dividing Cb by Cs; $AF = Cb/Cs$
- A report describing the procedures and results of the sampling event and calculations will be prepared.

SAMPLING PROCEDURES

The sampling procedures are described below:

- Four sub-slab gas probes (VS-3, VS-10, VS-11 and VS-13) will be sampled in 500-milliliter (ml) Tedlar bags with laboratory-supplied, dedicated disposable syringes and three-way valves

⁵ USEPA, "Indoor Radon and Radon Decay Product Measurement Device Protocols," Washington, DC: USEPA, 402-R-92-004, July, 1992 (revised), <http://www.epa.gov/radon/pubs/devprot2.html>.

appropriate for soil gas collection. Sample bags will be filled by quickly fitting the syringes to the Swagelok fitting of each vapor point. Sub-slab air will be collected by expanding the syringe plunger drawing air from below the foundation slab into the syringe. The three-way valve will then be turned and syringe depressed expelling the air into the sample bag. This process will continue, approximately 4 times, until the 500-ml Tedlar bag is approximately 80% full. The sample bag's valve will then be closed and the sample labeled and packaged for shipment. Two sample bags will be collected at each sub-slab probe, so that if one bag is compromised, there is another sample available.

The indoor air samples will be collected just above the floor surface in the Kelly-Moore Paint store at 649 Pacific Avenue, in the Kelly-Moore Paint storeroom at 951 Pacific Avenue, and in the East Ocean Seafood Restaurant at 1713 Webster Street. The samples will be drawn and placed into the Tedlar bag as described above. The sample bag valve will be closed and the sample labeled and packaged for shipment.

- The outdoor ambient air sample will be collected outside in the parking lot, following the procedures described above.
- The samples will be logged onto chain-of-custody documents and packaged in a rigid container for overnight shipment to the laboratory.

ACHCSA Comment #4 requested justification for collecting the samples for radon analysis using a syringe and Tedlar bag, rather than a time-weighted sampling method. The method proposed for use by Trinity is recommended as the most practical method in the McHugh, *et al.*, (2008) reference. The syringe and Tedlar bag grab-sample technique is preferred over other methods because:

- Other measurement devices (charcoal canister, etc.) require long-term exposure durations of 48 hours to three months. These devices are relatively large and cannot easily be placed below a building foundation for the required sampling period.
- High moisture levels in soil gas interfere with the sorption of radon onto charcoal canisters.
- McHugh, *et al.*, compared indoor air radon analytical results for samples collected using 48-hour charcoal canisters with grab samples, and found that the analytical results were similar with no consistent bias observed.

Trinity also notes that the purpose of this radon sampling is not to determine radon exposure data (the purpose for which radon sampling guidance was developed), but simply to determine the difference between sub-slab and indoor radon concentrations. Therefore, the sampling technique should be consistent between the two sample types. Because grab samples are the most practical method for sampling the sub-slab probes for radon, grab samples should similarly be used for the indoor air samples.

LABORATORY METHODS

The laboratory methods are listed below:

- The four sub-slab vapor samples, the three indoor air samples, and the ambient air sample will be analyzed for radon using an alpha-scintillation counting method. The analysis will be performed by the University of Southern California Department of Geosciences laboratory.

REPORTING

Following receipt of analytical results, Trinity will prepare a summary report of the procedures and findings of this AF determination. The report will include a map showing sample collection locations, field sampling data, AF calculations, and analytical data, along with certified analytical reports and chain-of-custody documentation.

DISTRIBUTION

A copy of this letter has been forwarded to:

Mr. Don Lindsey
Timber Del Properties, LLC
2424 Central Avenue
Alameda, CA 94501

Ms. Georgia Turner
Vice-President
The Mechanics Bank
1999 Harrison St., Suite 810
Oakland, CA 94612

Ms. Barbara Roesner
Senior Credit Analyst
The Mechanics Bank
1999 Harrison St., Suite 810
Oakland, CA 94612

Please call Trinity at (831) 426-5600 with any questions regarding this letter.

Sincerely,

TRINITY SOURCE GROUP, INC.

David A. Reinsma, PG
President and Principal Geologist



Debra J. Moser, PG, CEG, CHG
Senior Geologist

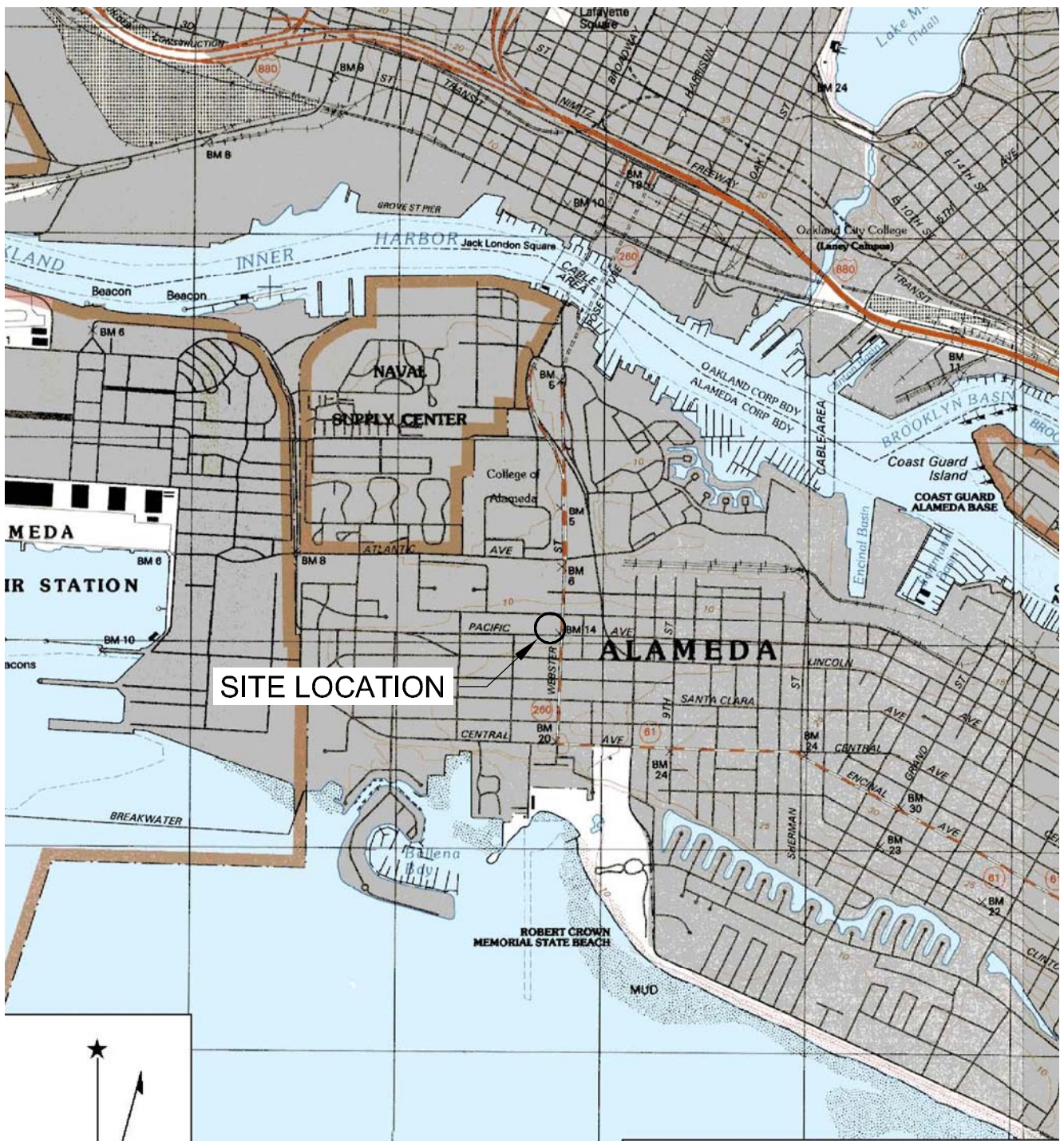
Attachments:

Figure 1 – Site Location Map

Figure 2 – Site Layout and Proposed Sampling Locations

Attachment A: Alameda County Health Care Services Agency Letter Dated February 18, 2010

FIGURES



Name: OAKLAND WEST
Date: 5/4/2006

Location: 037° 46' 34.86" N 122° 16' 37.65" W NAD 27
Caption: San Francisco Bay, Oakland West Quadrangle - 1:24,000

REF. 103_002\SLM.DWG
BASEMAP FROM MAPTECH, INC.

PREPARED BY



Tel: (831) 426-6600 Fax: (831) 426-6602

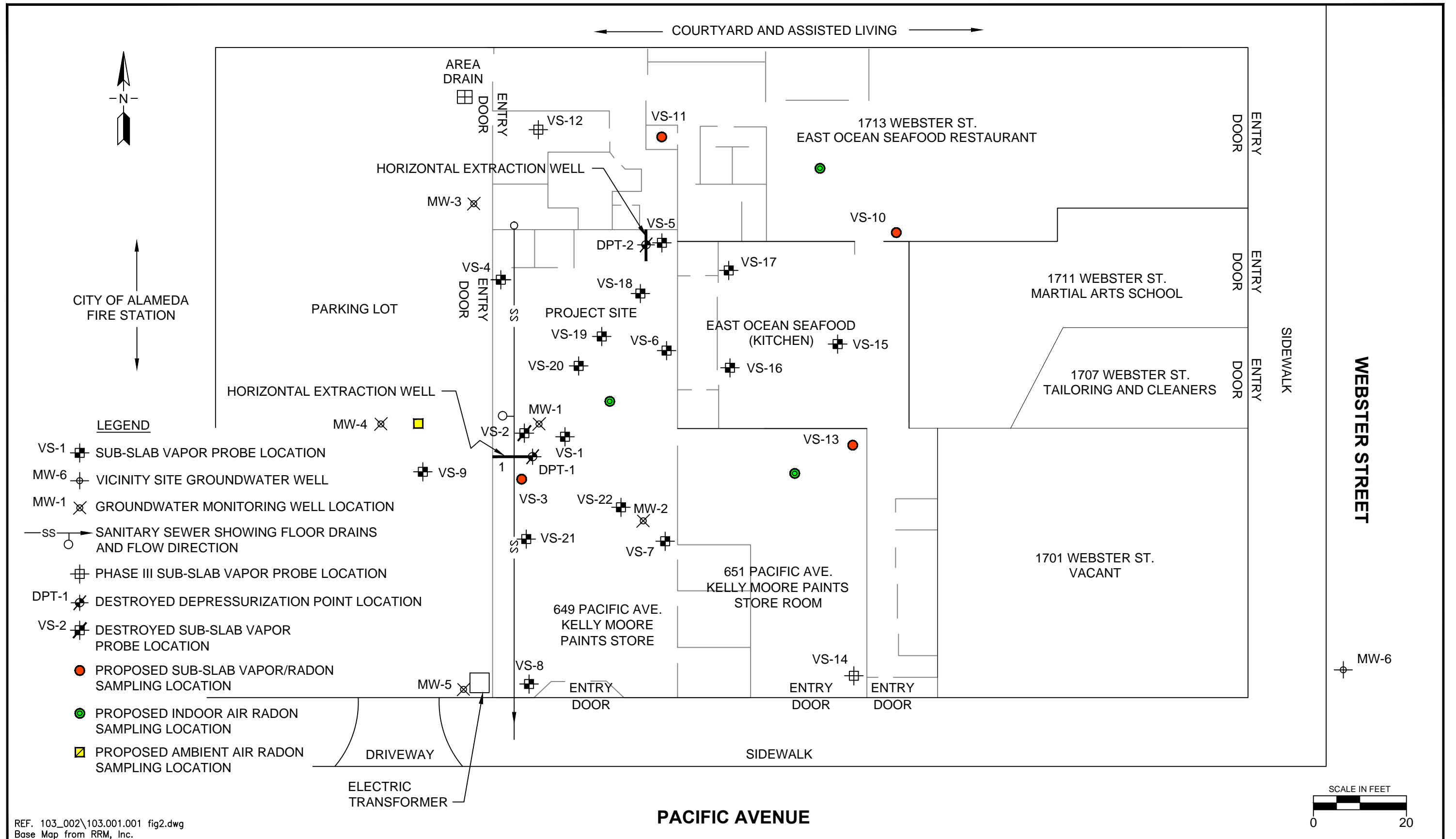
SITE LOCATION MAP

Searway Property
649 Pacific Avenue
Alameda, California

PROJECT:
103.001.001

FIGURE:

1



REF. 103_002\103.001.001 fig2.dwg
 Base Map from RRM, Inc.

PREPARED BY



TRINITY
 source group, inc.
 Environmental Consultants

500 Chestnut Street, Suite 225
 Santa Cruz, California 95060
 v: 831.426.5600
 f: 831.426.5602

SITE LAYOUT AND PROPOSED SAMPLING LOCATIONS

Searway Property
 649 Pacific Avenue
 Alameda, California



PROJECT: 103.001.001
FIGURE: 2

ATTACHMENT A

**ALAMEDA COUNTY HEALTH CARE
SERVICES AGENCY LETTER
DATED FEBRUARY 18, 2010**



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

February 18, 2010

Mr. Donald Lindsey
Timber Del Properties, LLC
2424 Central Avenue
Alameda, CA 94501

Mr. Carl Searway
3032 Dakota Street
Oakland, CA 94602

Subject: SLIC Case No. RO0002584 and Geotracker Global ID SL0600150413, Searway Property, 649 Pacific Avenue, Alameda, CA 94501 – Technical Comments on Work Plan

Dear Mr. Lindsey and Mr. Searway:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above referenced site including the recently submitted document entitled, "*Sub-Slab Attenuation Factor Determination Work Plan*," dated January 7, 2010 (Work Plan). The Work Plan, which was prepared on behalf of Mr. Lindsey by Trinity Source Group, Inc., proposes following the methods of McHugh et al (2008) to determine a site-specific attenuation factor for the building floor slabs at the above referenced site. In general, the proposed method may be suitable to estimate the site-specific attenuation factor if properly implemented. If VOC concentrations beneath the building continue to decrease, the estimation of a site-specific attenuation factor may be used to evaluate the conditions under which operation of the sub-slab depressurization system operation may be terminated at a future date.

Technical comments 1 through 5 will require revision of the Work Plan or will require justification of the proposed methods. Therefore, we request that you address the technical comments below and prepare a Revised Sub-Slab Attenuation Factor Determination Work Plan.

TECHNICAL COMMENTS

1. **Scope of Proposed Sub-slab and Indoor Air Sampling.** The Work Plan proposes the collection of soil vapor samples from three sub-slab vapor probes, one indoor air sampling location, and one outdoor ambient air sample. All three sub-slab vapor samples (VS-5, VS-19, and VS-3) are located within the Kelly Moore Paints store. VOCs have also been detected in sub-slab vapor samples at locations within the adjacent East Ocean Seafood Restaurant, which appears to be located within a different building than the Kelly Moore Paints store. The different buildings may have different floor slabs, ventilation, floor coverings, and other conditions that may affect vapor attenuation. We also note that potential vapor entry points in the foundation of the Kelly-Moore Paints store were inspected and sealed as part of the diagnostic test procedures conducted on October 17, 2007 but foundation penetrations in the East Ocean Seafood Restaurant were not sealed with the exception of the northwestern corner of the East Ocean Seafood Restaurant,. Due to these differences, the estimation of an attenuation factor based solely on results from the Kelly-Moore Paints store may not be representative of conditions in the East Ocean Seafood Restaurant. Therefore, we request that you add a minimum of one sub-slab vapor sample and one indoor air sample within the East Ocean

Seafood Restaurant. Based on previous results, the highest concentrations of VOCs beneath the sub-slab of the East Ocean Seafood Restaurant are present in the area of VS-11. Please include plans to collect a minimum of one additional sub-slab vapor sample from VS-11 and one additional indoor air sample from the area near VS-11.

2. **Sub-Slab Sampling and Analytical Methods.** The Work Plan proposes that sub-slab vapor samples will be collected without purging using disposable syringes and Tedlar bags. This method differs from the method previously used to collect sub-slab vapor samples at the site and the methods described in the guidance document prepared by the U.S. Environmental Protection Agency entitled, "*Draft Standard Operating Procedures (SOP) for Installation of Sub-Slab Vapor Probes and Sampling Using EPA Method TO-15 to Support Vapor Intrusion Investigations.*" In the Revised Work Plan requested below, please provide justification for using the proposed sub-slab vapor sampling and analytical methods including a comparison of the expected concentrations of the chemicals of concern to the reporting limits of the proposed analytical methods.
3. **Analysis of Indoor and Outdoor Air Samples.** The Work Plan indicates that the indoor air and outdoor air samples will be analyzed for radon only. We request that the indoor air and outdoor air samples also be analyzed for VOCs and Stoddard Solvent. Please include this modification to the Revised Work Plan requested below. We note that revised indoor air sampling methods will be required in order to analyze the samples for VOCs and Stoddard Solvent.
4. **Indoor Air Sampling and Analytical Methods.** The Work Plan proposes the collection of indoor air samples using a syringe and Tedlar bag for radon analysis. In the Revised Work Plan requested below, please provide justification for the proposed method versus a longer time weighted sampling method that may be less affected by temporal variability.
5. **Factors Affecting Indoor Air Sampling Results.** We request that you expand the discussion of the methods that will be used to assure that the indoor air samples collected will be representative of typical exposure and that the factors affecting indoor air quality have been considered. Such factors include but are not limited to the operation of the heating, ventilation, and air conditioning, (HVAC) systems, the proximity of the indoor sampling locations to ductwork or potential vapor entry points, and occupancy of the buildings prior to and during sampling. For example, will the HVAC system be operated 24 hours in advance of sampling and during sampling? In general, the HVAC system should be operated under normal conditions and unnecessary building ventilation should be avoided prior to and during sampling. An inspection of the building and sampling locations should be conducted prior to indoor air sampling to identify products or features that may affect the sampling results.
6. **Groundwater Monitoring.** Please continue groundwater monitoring at the site on a semi-annual basis and present the results in the reports requested below.

Mr. Donald Lindsey
Mr. Carl Searway
RO0002584
February 18, 2010
Page 3

TECHNICAL REPORT REQUEST

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

- **April 30, 2010** – Revised Sub-Slab Attenuation Factor Determination Work Plan
- **August 15, 2010** – Semi-Annual Groundwater Monitoring and Sub-slab Vapor Depressurization System Performance Report

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/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.

Mr. Donald Lindsey
Mr. Carl Searway
RO0002584
February 18, 2010
Page 4

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.

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) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



Digitally signed by Jerry Wickham
DN: cn=Jerry Wickham, o, ou,
email=jerry.wickham@acgov.org, c=US
Date: 2010.02.18 18:35:21 -08'00'

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

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: David Reinsma, Trinity Source Group, 500 Chestnut Street, Suite 225, Santa Cruz, CA 95060 (*Sent via E-mail to: dar@tsqcorp.net*)

Debra Moser, Trinity Source Group, 500 Chestnut Street, Suite 225, Santa Cruz, CA 95060 (*Sent via E-mail to: djm@tsqcorp.net*)

Donna Drogos, ACEH (*Sent via E-mail to: donna.drogos@acgov.org*)
Jerry Wickham, ACEH
Geotracker, File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: March 27, 2009
	PREVIOUS REVISIONS: December 16, 2005, October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:
RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Additional Recommendations

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

Submission Instructions

- 1) Obtain User Name and Password:
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to dehloptoxic@acgov.org
Or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of My Le Huynh.
 - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO# use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.