

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

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

May 7, 2007

Mr. Chet Green
Clorox Services Company
7200 Johnson Drive
Pleasanton, CA 94588-8004

Subject: Fuel Leak Case No. RO0002859 and Geotracker Global ID T0600100447, Clorox Services Company, 7280 Johnson Drive, Pleasanton, CA 94588

Dear Mr. Green:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site, including the recently submitted report entitled, "Subsurface Investigation Report," dated April 2, 2007 and received by ACEH on April 19, 2007. The Subsurface Investigation Report, which was prepared on your behalf by Bureau Veritas, presents the results of one soil boring advanced in the area of a former diesel UST and dispenser. One grab groundwater sample was collected from the boring and analyzed for total petroleum hydrocarbons (TPH) as gasoline, TPH as diesel, BTEX, and MTBE. TPH as diesel, which was detected at a concentration of 80 micrograms per liter, was the only analyte detected. The report requests that ACEH review the site for case closure.

In our March 1, 2007 correspondence, we requested information regarding the UST and dispenser that were removed in 1989 from an area immediately south of the current fuel release site. ACEH files do not include information on a fuel leak investigation related to the 1989 UST removal. Our March 1, 2007 correspondence requested that you submit all data and reports for site investigation activities and the five monitoring related to the three USTs removed in 1989. The Subsurface Investigation Report dated April 2, 2007 does not include this information nor have we received this information in other correspondence. In order for the site at 7280 Johnson Drive in Pleasanton to be reviewed for case closure, submittal of all information regarding the 1989 UST removal, site investigation, and monitoring wells is necessary. We request that you address the following technical comment, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Monitoring Wells.** Please confirm that the five monitoring wells shown on Figure 2 of the Work Plan have been decommissioned. As described above in the Request for Information, data from these wells and any subsurface investigation conducted in this area are relevant to the current fuel leak release and are to be submitted to ACEH with the Site Investigation Report requested below.

Mr. Chet Green
RO0002859
May 7, 2007
Page 2

TECHNICAL REPORT REQUEST

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

- **July 6, 2007** – All Information and Reports Regarding 1989 UST Removal and Monitoring Wells

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

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).

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. Chet Green
RO0002859
May 7, 2007
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

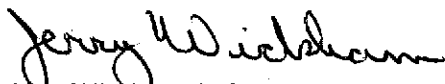
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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) 567-6791.

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Colleen Winey, QIC 80201
Zone 7 Water Agency
100 North Canyons Parkway
Livermore, CA 94551

Danielle Stefani
Livermore-Pleasanton Fire Department
3560 Nevada Street
Pleasanton, CA 94566

Michael Zimmerman
Bureau Veritas
6920 Koll Center Parkway, Suite 216
Pleasanton, CA 94566

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
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FAX (510) 337-9335

March 1, 2007

Mr. Chet Green
Clorox Services Company
7200 Johnson Drive
Pleasanton, CA 94588-8004

Subject: Fuel Leak Case No. RO0002859 and Geotracker Global ID T0600100447, Clorox Services Company, 7280 Johnson Drive, Pleasanton, CA 94588 – Work Plan Approval

Dear Mr. Green:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site, including the recently submitted work plan entitled, "Groundwater Sample Workplan," dated February 28, 2007. The Work Plan, which was prepared on your behalf by Bureau Veritas, proposed advancing one soil boring and collection and analysis of one grab groundwater sample. The proposed scope of work is acceptable provided that the technical comments below are addressed and incorporated during the proposed field investigation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan or technical comments below is proposed.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to jerry.wickham@acgov.org) prior to the start of field activities.

REQUEST FOR INFORMATION

ACEH's case files for the subject site contains only the report entitled, "Closure Report for Diesel Underground Storage Tank," dated May 21, 2004, which reports the results from the 2004 removal of a diesel UST and dispenser. We previously requested that you submit copies of any other reports you have documenting additional investigation activities or other work that is relevant to the fuel release case. We note that a UST and dispenser were removed in 1989 from an area immediately south of the current fuel release site. Information on the geology and hydrogeology and analytical results from the monitoring wells and any other investigation conducted in this area of the immediately to the south is directly relevant to the diesel UST release currently being investigated. Therefore, please submit all data and reports for the five monitoring wells and other investigation related to the three USTs removed in 1989. ACEH files do not include information on a fuel leak investigation related to the 1989 UST removal.

TECHNICAL COMMENTS

1. **Proposed Soil Sampling.** We request that soils from the proposed direct push soil boring be screened in the field as the boring is advanced. Soil samples are to be collected for laboratory analysis from any zones where visible staining, odor, or elevated PID readings are observed. Please note that if visible staining, odor, or elevated PID readings are observed, a sufficient number of soil samples must be collected to characterize the vertical interval over which the contamination occurs. Any soil samples collected from intervals of visible staining, odor, or elevated PID readings are to be analyzed for TPH as gasoline and TPH as diesel by EPA Method 8015 and BTEX and MTBE by EPA Method 8260. Please present boring logs, screening results, and any analytical data for soil samples in the Site Investigation Report requested below.
2. **Proposed Groundwater Sampling and Analyses.** The proposed grab groundwater sampling methods are acceptable. We request that the groundwater sample be analyzed for TPH as gasoline in addition to the proposed analyses for TPH as diesel, BTEX, and fuel oxygenates. Please present results in the Site Investigation Report requested below.
3. **Monitoring Wells.** Please confirm that the five monitoring wells shown on Figure 2 of the Work Plan have been decommissioned. As described above in the Request for Information, data from these wells and any subsurface investigation conducted in this area are relevant to the current fuel leak release and are to be submitted to ACEH with the Site Investigation Report requested below.

TECHNICAL REPORT REQUEST

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

- **July 2, 2007** – Site Investigation 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

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).

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.

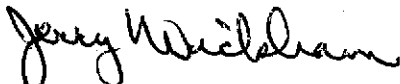
AGENCY OVERSIGHT

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Mr. Chet Green
March 1, 2007
Page 4

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Colleen Winey, QIC 80201
Zone 7 Water Agency
100 North Canyons Parkway
Livermore, CA 94551

Danielle Stefani
Livermore-Pleasanton Fire Department
3560 Nevada Street
Pleasanton, CA 94566

Michael Zimmerman
Bureau Veritas
6920 Koll Center Parkway, Suite 216
Pleasanton, CA 94566

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Wickham, Jerry, Env. Health

From: mike.zimmerman@us.bureauveritas.com
Sent: Thursday, March 01, 2007 1:08 PM
To: Wickham, Jerry, Env. Health
Cc: chester.green@clorox.com; allison.florence@us.bureauveritas.com
Subject: RE: RO2859 Report Upload

Thanks, Jerry, we received your fax.
We are making preparations to take care of the technical changes you had (soil logging, using a PID, adding TPH-gas as an analytical method for the gw, etc.). Thanks to your quick reply, we are still on for tomorrow.



**BUREAU
VERITAS**

Michael J. Zimmerman, P.E., R.E.A.
Senior Project Manager
Bureau Veritas North America, Inc.
Health, Safety, and Environmental Services
6920 Koll Center Parkway, Suite 216, Pleasanton, CA 94566
p: 925.426.2681, c: 925.580.5516, f: 925.426.0106
mike.zimmerman@us.bureauveritas.com
www.us.bureauveritas.com

"Wickham, Jerry, Env. Health"
<jerry.wickham@acgov.org>

To Mike Zimmerman/USA/VERITAS@VERITAS
cc
Subject RE: RO2859 Report Upload

03/01/2007 12:27 PM

Mike,

I completed a review and faxed over the comment letter.

Regards,
Jerry Wickham
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 fax
jerry.wickham@acgov.org

From: mike.zimmerman@us.bureauveritas.com [mailto:mike.zimmerman@us.bureauveritas.com]
Sent: Thursday, March 01, 2007 10:48 AM
To: Wickham, Jerry, Env. Health
Subject: RE: RO2859 Report Upload

3/1/2007

Thanks, Jerry.

I agree, we should not rush this and should have given you more time. We have the ability to postpone the work tomorrow and can do it if you'd prefer to give more time to review and discuss the project.



Michael J. Zimmerman, P.E., R.E.A.
Senior Project Manager
Bureau Veritas North America, Inc.
Health, Safety, and Environmental Services
6920 Koll Center Parkway, Suite 216, Pleasanton, CA 94566
p: 925.426.2681, c: 925.580.5516, f: 925.426.0106
mike.zimmerman@us.bureauveritas.com
www.us.bureauveritas.com

"Wickham, Jerry, Env. Health"
<jerry.wickham@acgov.org>

03/01/2007 09:50 AM

To Mike Zimmerman/USA/VERITAS@VERITAS, Allison
Florence/USA/VERITAS@VERITAS, <chester.green@clorox.com>
cc
Subject RE: RO2859 Report Upload

I will provide comments on the Work Plan by the end of the day; however, please note:

- 1) General comments provided during a phone conversation are not a basis for assuming work plan approval.
- 2) Allowing one day of regulatory review time prior to scheduled drilling is not a reasonable schedule.

Jerry Wickham
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 fax
jerry.wickham@acgov.org

From: mike.zimmerman@us.bureauveritas.com [mailto:mike.zimmerman@us.bureauveritas.com]
Sent: Wednesday, February 28, 2007 11:30 AM
To: allison.florence@us.bureauveritas.com; chester.green@clorox.com; dehloptoxic, Env. Health; Wickham, Jerry, Env. Health
Subject: RO2859 Report Upload

An electronic copy of the Sample Workplan for the Subject Case has been uploaded to the Alameda County website as required for the Clorox facility at 7280 Johnson Drive, in Pleasanton per the County's December 28, 2006 letter. We have included a P.G. certification/stamp as required by the County.

The Workplan filename is RO#2859_Workplan_2007-02-28.pdf

3/1/2007

We will collect one grab groundwater sample in the area of the former UST and dispenser and analyze it for TPH-d, MTBE, and VOCs.

We anticipate the Workplan meets your needs based on our call, but please let us know if you have any changes. We have scheduled with the driller to be onsite on Friday, March 2, 2007 to perform the sampling. Thank you.



Michael J. Zimmerman, P.E., R.E.A.

Senior Project Manager

Bureau Veritas North America, Inc.

Health, Safety, and Environmental Services

6920 Koll Center Parkway, Suite 216, Pleasanton, CA 94566

p: 925.426.2681, c: 925.580.5516, f: 925.426.0106

mike.zimmerman@us.bureauveritas.com

www.us.bureauveritas.com

Wickham, Jerry, Env. Health

To: mike.zimmerman@us.bureauveritas.com; allison.florence@us.bureauveritas.com;
chester.green@clorox.com

Subject: RE: RO2859 Report Upload

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- 2) Allowing one day of regulatory review time prior to scheduled drilling is not a reasonable schedule.

Jerry Wickham

Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 fax
jerry.wickham@acgov.org

From: mike.zimmerman@us.bureauveritas.com [mailto:mike.zimmerman@us.bureauveritas.com]

Sent: Wednesday, February 28, 2007 11:30 AM

To: allison.florence@us.bureauveritas.com; chester.green@clorox.com; dehloptoxic, Env. Health; Wickham, Jerry, Env. Health

Subject: RO2859 Report Upload

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HEALTH CARE SERVICES

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DAVID J. KEARS, Agency Director



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ENVIRONMENTAL PROTECTION
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Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

December 28, 2006

Mr. Chet Green
Clorox Services Company
7200 Johnson Drive
Pleasanton, CA 94588-8004

Subject: Fuel Leak Case No. RO0002859 and Geotracker Global ID T0600100447, Clorox Services Company, 7280 Johnson Drive, Pleasanton, CA 94588 – Request for Work Plan

Dear Mr. Green:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site, including the report entitled, "Closure Report for Diesel Underground Storage Tank," dated May 21, 2004. The report, which was prepared on your behalf by Clayton Group Services, presents the results of tank removal activities conducted at 7280 Johnson Drive in April 2004. Total petroleum hydrocarbons as diesel were detected in one composite soil sample collected from the soil stockpile. The site is within the Livermore-Amador Valley, which is an area where groundwater is actively used as a drinking water supply. Groundwater within the Livermore-Amador Groundwater Basin constitutes a valuable current and future resource. Due to the location of your site within a groundwater basin where groundwater is used for drinking water, we request that you collect a minimum of one groundwater sample at the site to evaluate whether groundwater has potentially been affected by a fuel release.

Please submit a work plan detailing your proposal to investigate potential soil and groundwater contamination by **March 23, 2007**. This report is being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

REQUEST FOR INFORMATION

ACEH's case files for the subject site contains only the report entitled, "Closure Report for Diesel Underground Storage Tank," dated May 21, 2004. We request that you submit copies of any other reports you have documenting additional investigation activities or other relevant work related to this UST system/site with the work plan requested below.

TECHNICAL REPORT REQUEST

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

- **March 23, 2007** – Work Plan for Subsurface Investigation

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

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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.

LANDOWNER NOTIFICATION REQUIREMENTS

Pursuant to California Health & Safety Code Section 25297.15, the active or primary responsible party for a fuel leak case must inform all current property owners of the site of cleanup actions or requests for closure. Furthermore, ACEH may not consider any cleanup proposals or requests for case closure without assurance that this notification requirement has been met. Additionally, the active or primary responsible party is required to forward to ACEH a complete mailing list of all record fee title holders to the site.

In the future, for you to meet these requirements when submitting cleanup proposals or requests for case closure, ACEH requires that you:

1. Notify all current record owners of fee title to the site of any cleanup proposals or requests for case closure;
2. Submit a letter to ACEH which certifies that the notification requirement in 25297.15(a) of the Health and Safety Code has been met;
3. Forward to ACEH a copy of your complete mailing list of all record fee title holders to the site; and
4. Update your mailing list of all record fee title holders, and repeat the process outlined above prior to submittal of any additional *Corrective Action Plan* or your *Request for Case Closure*.

Your written certification to ACEH (Item 2 above) must state, at a minimum, the following:

A. *In accordance with Section 25297.15(a) of the Health & Safety Code, I, (name of primary responsible party), certify that I have notified all responsible landowners of the enclosed proposed action. (Check space for applicable proposed action(s)):*

cleanup proposal (Corrective Action Plan)

request for case closure

local agency intention to make a determination that no further action is required

local agency intention to issue a closure letter

- OR -

B. *In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (name of primary responsible party), certify that I am the sole landowner for the above site.*

(Note: Complete item A if there are multiple site landowners. If you are the sole site landowner, skip item A and complete item B.)

Mr. Chet Green
December 28, 2006
Page 4

UNDERGROUND STORAGE TANK CLEANUP FUND

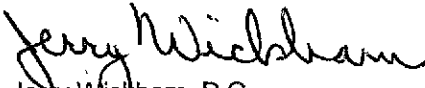
Please be aware that you may be eligible for reimbursement of the costs of investigation from the California Underground Storage Tank Cleanup Fund (Fund). In some cases, a deductible amount may apply. If you believe you meet the eligibility requirements, I strongly encourage you to call the Fund for an application.

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.

Sincerely,


Jerry Wickham, P.G.
Hazardous Materials Specialist

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Michael Hurd
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Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

F

Certified Mail #7002 2030 0006 9574 1730

December 27, 2006

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

NOTICE OF RESPONSIBILITY

Site Name & Address:

**CLOROX SERVICES COMPANY
7280 JOHNSON DR
PLEASANTON, CA 94588**

**Local ID: RO0002859
Related ID: NA
RWQCB ID:
Global ID: T0600100447**

Responsible Party:

**CHET GREEN
CLOROX SERVICES COMPANY
7200 JOHNSON DR
PLEASANTON CA 94588-8004**

Date First Reported: 5/21/2004

**Substance: 12034 Diesel fuel oil and additives, Nos.1-D, 2-D,
2-4**

Funding for Oversight: LOPF - LOP Federal Fund

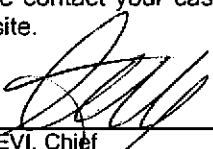
Multiple RPs?: No

Pursuant to sections 25297.1 and 25297.15 of the Health and Safety Code, you are hereby notified that the above site has been placed in the Local Oversight Program and the individual(s) or entity(ies) shown above, or on the attached list, has (have) been identified as the party(ies) responsible for investigation and cleanup of the above site. Section 25297.15 further requires the primary or active Responsible Party to notify all current record owners of fee title before the local agency considers cleanup or site closure proposals or issues a closure letter. For purposes of implementing section 25297.15, this agency has identified CLOROX SERVICES COMPANY as the primary or active Responsible Party. It is the responsibility of the primary or active Responsible Party to submit a letter to this agency, within 20 calendar days of receipt of this notice that identifies all current record owners of fee title. It is also the responsibility of the primary or active Responsible Party to certify to the local agency that the required notifications have been made at the time a cleanup or site closure proposal is made or before the local agency makes a determination that no further action is required. If property ownership changes in the future, you must notify this local agency within 20 calendar days from when you are informed of the change.

Any action or inaction by this local agency associated with corrective action, including responsible party identification, is subject to petition to the State Water Resources Control Board. Petitions must be filed within 30 days from the date of the action/inaction. To obtain petition procedures, please FAX your request to the State Water Board at (916) 341-5808 or telephone (916) 341-5650.

Pursuant to section 25296.10(c)(6) of the Health and Safety Code, a responsible party may request the designation of an administering agency when required to conduct corrective action. Please contact this office for further information about the designation process.

Please contact your caseworker WICKHAM, JERRY, at this office at (510)567-6791 if you have questions regarding your site.



ARIU LEVI, Chief
Contract Project Director

Date: 12/21/06

Action: Add
Reason:

Attachment A: Responsible Parties Data Sheet

cc: Jenniffer Jordan, SWRCB, D. Dragos, J Wickham

NOR1 rpt - NOR 2006 Revision

ALAMEDA COUNTY ENVIRONMENTAL HEALTH
LUFT LOCAL OVERSIGHT PROGRAM

ATTACHMENT A - RESPONSIBLE PARTIES DATA SHEET

December 27, 2006

Site Name & Address:

**CLOROX SERVICES COMPANY
7280 JOHNSON DR
PLEASANTON, CA 94588**

Local ID: RO0002859

Related ID: NA

RWQCB ID:

Global ID: T0600100447

All Responsible Parties

RP has been named a Primary RP - CHET GREEN
CLOROX SERVICES COMPANY
7200 JOHNSON DR | PLEASANTON, CA 94588-8004

Responsible Party Identification Background

Alameda County Environmental Health (ACEH) names a "Responsible Party," as defined under 23 C.C.R Sec. 2720. Section 2720 defines a responsible party 4 ways. An RP can be:

1. "Any person who owns or operates an underground storage tank used for the storage of any hazardous substance."
2. "In the case of any underground storage tank no longer in use, any person who owned or operated the underground storage tank immediately before the discontinuation of its use."
3. "Any owner of property where an unauthorized release of a hazardous substance from an underground storage tank has occurred."
4. "Any person who had or has control over an underground storage tank at the time of or following an unauthorized release of a hazardous substance."

ACEH has named the responsible parties for this site as detailed below.

Existence of Unauthorized Release

One 10,000-gallon Underground Storage Tank, that last contained diesel fuel, was removed from the site on April 16, 2004. Laboratory analytical results from the tank removal sampling indicated low levels of total petroleum hydrocarbons as diesel fuel in the tank excavation backfill material.

Responsible Party Identification

Clorox Services Company is a responsible party for the fuel leak because the unauthorized release occurred during the time that Clorox Services Company owned and operated the UST (Definition 2), Clorox Services Company is the current owner of the property where an unauthorized release has occurred (Definition 3), and Clorox Services Company had control of the UST at the time of or following an unauthorized release (Definition 4).

U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT <i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage \$ _____ Certified Fee _____ Return Receipt Fee (Endorsement Required) _____ Restricted Delivery Fee (Endorsement Required) _____ Total Postage & Fees \$ _____	Postmark Here
Sent To <u>Chet Green, Clorox Services Co.</u> Street, Apt. No., or PO Box No. <u>7200 Johnson Drive</u> City, State, ZIP+4 <u>Pleasanton CA 94588-8004</u>	
PS Form 3800, June 2002 See Reverse for Instructions	

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature <u>Chet Green</u> <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee B. Received by (Printed Name) <u>Chet Green</u> C. Date of Delivery <u>1/2/07</u> D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:
1. Article Addressed to: <u>Chet Green</u> <u>Clorox Services Company</u> <u>7200 Johnson Drive</u> <u>Pleasanton, CA 94588-8004</u>	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.
2. Article Number (Transfer from service label)	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes
7002 2030 0006 9574 1730	

Wickham, Jerry, Env. Health

From: mike.zimmerman@us.bureauveritas.com
Sent: Wednesday, May 16, 2007 2:26 PM
To: Wickham, Jerry, Env. Health
Cc: allison.florence@us.bureauveritas.com; chester.green@clorox.com
Subject: RO2859 Report - Groundwater Well Destruction Update



pic21768.jpg (3 KB)

Jerry, we received your letter dated May 7, 2007 requesting documentation of the destruction of the wells at the 7280 Johnson Drive Clorox site. This email provides a quick update for you and our client, Clorox.

Below is a summary of the wells and their destruction status.

* MW-1 - Based on historical reports, this well was installed in 1988 and destroyed in 1989 by Kleinfelder during a UST removal at the site. We currently do not have a well destruction report for MW-1. We conacted Wyman Hong at Alameda County Zone 7. He said the Zone 7 database showed the well was destroyed but the agency did not have a well destruction report. Mr. Hong said he has contacted Kleinfelder to provide a copy of a well destruction report. Mr. Hong will send us a copy when he receives it.

* MW-2 through MW-5 - Bureau Veritas opened a permit with Zone 7 and properly abandoned/closed these wells in December 2006. We have a Well Destruction Report that we will upload to the County website.

We will upload a summary report with the documenation to the County website as soon as we receive the information related to MW-1 from Zone 7.

(Embedded Michael J. Zimmerman, P.E., R.E.A.
image moved Manager, Environmental Compliance
to file: Bureau Veritas North America, Inc.
pic21768.jp Health, Safety, and Environmental Services
g) 6920 Koll Center Parkway, Suite 216, Pleasanton, CA 94566
p: 925.426.2681, c: 925.580.5516, f: 925.426.0106
mike.zimmerman@us.bureauveritas.com
www.us.bureauveritas.com

UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

EMERGENCY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		FOR LOCAL AGENCY USE ONLY I HEREBY CERTIFY THAT I HAVE DISTRIBUTED THIS INFORMATION ACCORDING TO THE DISTRIBUTION SHOWN ON THE INSTRUCTION SHEET ON THE BACK PAGE OF THIS FORM.	
REPORT DATE 1 <u>4</u> 2 <u>1</u> 1 <u>3</u> 0 <u>4</u>		CASE #		SIGNED <u>[Signature]</u> DATE <u>02/14/05</u>	
REPORTED BY:	NAME OF INDIVIDUAL FILING REPORT Chet Green		PHONE (925) 425-6624	SIGNATURE <u>[Signature]</u> 12/13/04	
	REPRESENTING <input type="checkbox"/> LOCAL AGENCY <input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> OTHER		COMPANY OR AGENCY NAME Clorox Services Co.		
RESPONSIBLE PARTY	ADDRESS 7200 Johnson Dr. Pleasanton, Ca 94588				
	NAME Clorox Services Co.		CONTACT PERSON Chet Green	PHONE (925) 525-6624	
SITE LOCATION	ADDRESS 7280 Johnson Dr. Pleasanton, Ca 94588				
	FACILITY NAME (IF APPLICABLE) Clorox Services Co.		OPERATOR Chet Green	PHONE (925) 425-6624	
	CROSS STREET Stoneridge Drive				
IMPLEMENTING AGENCIES	LOCAL AGENCY Livermore/Pleasanton Fire Dept.		CONTACT PERSON John Rigter	PHONE (925) 454-2337	
	REGIONAL BOARD State Water Resource Control Board			PHONE (916) 341-5250	
SUBSTANCES INVOLVED	(1) NAME Diesel Fuel		QUANTITY LOST (GALLONS) 24mg/kg <input type="checkbox"/> UNKNOWN		
	(2)		<input type="checkbox"/> UNKNOWN		
DISCOVERY/ABATEMENT	DATE DISCOVERED 0 <u>4</u> 1 <u>9</u> 0 <u>4</u>		HOW DISCOVERED <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS <input type="checkbox"/> TANK TEST <input checked="" type="checkbox"/> TANK REMOVAL <input type="checkbox"/> OTHER		
	DATE DISCHARGE BEGAN <input checked="" type="checkbox"/> UNKNOWN		METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input checked="" type="checkbox"/> REMOVE CONTENTS <input checked="" type="checkbox"/> CLOSE TANK & REMOVE <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> REPAIR TANK <input checked="" type="checkbox"/> CLOSE TANK & FILL IN PLACE <input type="checkbox"/> CHANGE PROCEDURE <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE 0 <u>4</u> 1 <u>6</u> 0 <u>4</u>		
	HAS DISCHARGE BEEN STOPPED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		REPLACE TANK <input type="checkbox"/> OTHER		
SOURCE/CAUSE	SOURCE OF DISCHARGE <input type="checkbox"/> TANK LEAK <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER		CAUSE(S) <input type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input type="checkbox"/> SPILL <input type="checkbox"/> CORROSION <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER		
	CHECK ONE ONLY <input type="checkbox"/> UNDETERMINED <input checked="" type="checkbox"/> SOIL ONLY <input type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)				
CURRENT STATUS	CHECK ONE ONLY <input checked="" type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT WORKPLAN SUBMITTED <input type="checkbox"/> POLLUTION CHARACTERIZATION <input type="checkbox"/> LEAK BEING CONFIRMED <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT UNDERWAY <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS <input type="checkbox"/> REMEDIATION PLAN <input type="checkbox"/> CASE CLOSED (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> CLEANUP UNDERWAY				
	CHECK APPROPRIATE ACTION(S) <input type="checkbox"/> EXCAVATE & DISPOSE (ED) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (IT) <input type="checkbox"/> CAP SITE (CD) <input type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS) <input type="checkbox"/> CONTAINMENT BARRIER (CB) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> VENT SOIL (VS) <input type="checkbox"/> VACUUM EXTRACT (VE) <input checked="" type="checkbox"/> OTHER (OT) UST removed on April 16, 2004				
COMMENTS					

INSTRUCTIONS

EMERGENCY

Indicate whether emergency response personnel and equipment were involved at any time. If so, a Hazardous Material Incident Report should be filed with the State Office of Emergency Services (OES) at 2300 Meadowview Road, Sacramento, CA 95832. Copies of the OES report form may be obtained at your local underground storage tank permitting agency. Indicate whether the OES report has been filed as of the date of this report.

LOCAL AGENCY ONLY

To avoid duplicate notification pursuant to Health and Safety code Section 25180.5, a government employee should sign and date the form in this block. A signature here does not mean that the leak has been determined to pose a significant threat to human health or safety, only that notification procedures have been followed if required.

REPORTED BY

Enter your name, telephone number, and address. Indicate which party you represent and provide company or agency name.

RESPONSIBLE PARTY

Enter name, telephone number, contact person, and address of the party responsible for the leak. The responsible party would normally be the tank owner.

SITE LOCATION

Enter information regarding the tank facility. At a minimum, you must provide the facility name and full address.

IMPLEMENTING AGENCIES

Enter names of the local agency and Regional Water Quality Control Board involved.

SUBSTANCES INVOLVED

Enter the name and quantity lost of the hazardous substance involved. Room is provided for information on two substances if appropriate. If more than two substances leaked, list the two of most concern for cleanup.

DISCOVERY/ABATEMENT

Provide information regarding the discovery and abatement of the leak.

SOURCE/CAUSE

Indicate source(s) of leak. Check box(es) indicating cause of leak.

CASE TYPE

Indicate the case type category for this leak. Check one box only. Case type is based on the most sensitive resource affected. For example, if both soil and ground water have been affected, case type will be "Ground Water". Indicate "Drinking Water" only if one or more municipal or domestic water wells have actually been affected. A "Ground Water" designation does not imply that the affected water cannot be, or is not, used for drinking water, but only that water wells have not yet been affected. It is understood that case type may change upon further investigation.

CURRENT STATUS

Indicate the category which best describes the current status of the case. Check one box only. The response should be relative to the case type. For example, if case type is "Ground Water", then "Current Status" should refer to the status of the ground water investigation or cleanup, as opposed to that of soil. Descriptions of options follow:

No Action Taken - No action has been taken by responsible party beyond initial report of leak.

Leak Being Confirmed - Leak suspected at site, but has not been confirmed.
Preliminary Site Assessment Workplan Submitted - workplan/proposal requested of/submitted by responsible party to determine whether ground water has been, or will be, impacted as a result of the release.
Preliminary Site Assessment Underway - implementation of workplan.
Pollution Characterization - responsible party is in the process of fully defining the extent of contamination in soil and ground water and assessing impacts on surface and/or ground water.
Remediation Plan - remediation plan submitted evaluating long term remediation options. Proposal and implementation schedule for appropriate remediation options also submitted.
Cleanup Underway - implementation of remediation plan.
Post Cleanup Monitoring in Progress - periodic ground water or other monitoring at site, as necessary, to verify and/or evaluate effectiveness of remedial activities.
Case Closed - regional board and local agency in concurrence that no further work is necessary at the site.

IMPORTANT: THE INFORMATION PROVIDED ON THIS FORM IS INTENDED FOR GENERAL STATISTICAL PURPOSES ONLY AND IS NOT TO BE CONSTRUED AS REPRESENTING THE OFFICIAL POSITION OF ANY GOVERNMENTAL AGENCY

REMEDIAL ACTION

Indicate which action have been used to cleanup or remediate the leak. Descriptions of options follow:

Cap Site - install horizontal impermeable layer to reduce rainfall infiltration.
Containment Barrier - install vertical dike to block horizontal movement of contaminant.
Excavate and Dispose - remove contaminated soil and dispose in approved site.
Excavate and Treat - remove contaminated soil and treat (includes spreading or land farming).
Remove Free Product - remove floating product from water table.
Pump and Treat Groundwater - generally employed to remove dissolved contaminants.
Enhanced Biodegradation - use of any available technology to promote bacterial decomposition of contaminants.
Replace Supply - provide alternative water supply to affected parties.
Treatment at Hookup - install water treatment devices at each dwelling or other place of use.
Vacuum Extract - use pumps or blowers to draw air through soil.
Vent Soil - bore holes in soil to allow volatilization of contaminants.
No Action Required - incident is minor, requiring no remedial action.

COMMENTS - Use this space to elaborate on any aspects of the incident.

SIGNATURE - Sign the form in the space provided.

DISTRIBUTION

If the form is completed by the tank owner or his agent, retain the last copy and forward the remaining copies intact to your local tank permitting agency for distribution.

1. Original - Local Tank Permitting Agency
2. Regional Water Quality Control Board
3. Local Health Officer and County Board of Supervisors or their designees to receive Proposition 65 notifications.
4. Owner/responsible party.

LIVERMORE - PLEASANTON FIRE DEPARTMENT
3560 Nevada Street, Pleasanton, CA 94566

Alameda County
DEC 08 2004
Environmental Health Services

Contaminated Site Case Transfer Form

Referral To:

From

Date	12/2/04 (INITIALS) 8/11/04		
By (name)	Donna Rogos - LOP	Phone	925-454-2337
Agency	Alameda County Environmental Health, 1131 Harbor Bay Parkway, Alameda, CA 94502		
Attention	Donna L. Rogos, LOP/TOXICS Program Manager		
Transferred as:	<input checked="" type="checkbox"/> LOP	<input type="checkbox"/> TOXICS	
Level of Update requested:	<input type="checkbox"/> distribution list <input type="checkbox"/> all meetings <input type="checkbox"/> all site visits <input checked="" type="checkbox"/> closure sign off <input type="checkbox"/> all the above		

Site Information:

Site Name	CLOROX SERVICES COMPANY
Site Address	7280 JOHNSON DR. PLEASANTON CA 94588
Site Phone	925-425-6117
Site Contractor/Consultant (if available)	CLAYTON SERVICES
Site DBA	CLOROX SERVICES COMPANY

Site Conditions:

UST	
Initiating Event	<input checked="" type="checkbox"/> Closure <input type="checkbox"/> Work on system <input type="checkbox"/> Other
If UST(s) removed: # removed: <u>1</u>	Date removed: <u>4/11/04</u>
Contents:	<input type="checkbox"/> gasoline <input checked="" type="checkbox"/> diesel <input type="checkbox"/> waste oil <input type="checkbox"/> heating oil <input type="checkbox"/> solvents <input type="checkbox"/> kerosene <input type="checkbox"/> stoddard solvent <input type="checkbox"/> other (specify) _____
Observations of system (holes, leaks)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Observed contamination (free product, smell, soil/water discoloration)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Unauthorized Release Form filed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
NON-UST <u>N/A</u>	
Former industrial use?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Former Use Specify:	
ALL REFERRALS	
Detectable concentrations of soil and/or groundwater contamination? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No o Highest Concentration Detected in Soil Contaminant (specify) Concentration <u>24</u> ppm o Highest Concentration Detected in Water Contaminant (specify) Concentration ppb <u>GROUND WATER NOT EXCEEDED</u>	
Future intended use if known?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, specify <u>WARRANT USE: PAVING/SIDING AREA ADJACENT TO UNPAVED</u> If available, attach pertinent reports	

cc: Colleen Winey, Zone 7



December 2, 2004

Alameda County

DEC 08 2004

Environmental Health

Douglas R. Matkins
H, S & E Manager
Clorox Services Company
7200 Johnson Drive
Pleasanton CA 94588-8004

Subject: Removal of the Underground Storage Tank (UST) System Located at 7280 Johnson Dr

Dear Mr. Matkins,

On April 16, 2004, one, 10,000-gallon tank system, that last contained diesel fuel, was removed from the above-mentioned site by Clayton Group Services under Project No. 70-04572.00. The Closure Report was received by Livermore-Pleasanton Fire Department (LPFD) and included the following:

- Tank removal information and summary of closure activities conducted,
- Analytical results for soil and water samples taken during the removal process, and
- Disposal documents for the system components and remaining product/liquid.

The sampling results submitted indicate, a low level of hydrocarbon compounds associated with diesel fuel in the tank excavation backfill material. The stockpile sample (3 discreet samples composited to 1) found 24 mg/kg as diesel fuel.

Due to the low levels of diesel fuel found in the back fill material, additional work may be needed with respect to this former underground tank system. This case has been referred to the Alameda County Health Care Services, Environmental Health Division for review. For additional information, please contact Ms. Donna Drogos, PE, at:

Alameda County Health Care Services (ACHCS)
1131 Harbor Bay Parkway
Alameda, CA 94502
510-567-6700

Since this release has not been reported to the State of California, please do so at this time. Enclosed is an Unauthorized Release (Leak) Report. This needs to be completed and returned to Alameda County Health Care Services (ACHCS) LPFD. The site will then appear on the State's "Hazardous Waste and Substance Site List" until a case closure is obtained from the ACHCS or the Regional Water Quality Control Board.

If you have any questions concerning this letter, please contact me directly at 925-454-2337. Thank you for your cooperation in this matter.

Sincerely,

John F. Rigter
Hazardous Materials Inspector
Livermore-Pleasanton Fire Department

Cc: Michael Hurd, Senior Project Manager, Clayton Services
Donna Drogos, PE, Alameda County Health Care Services, Environmental Health Division

3560 Nevada Street, Pleasanton, CA 94566

Administration & Suppression
(925) 454-2361
Fax 249-2397

Fire Prevention Bureau
(925) 454-2361
Fax 454-2367

UNDERGROUND TANK CLOSURE CHECKLIST

AUG 18 2004

Business Name: Chlorox Date: 4/16/04
 Business Address: 7280 Johnson Drive # Tanks being removed: 1
 Tank #1 316-SS Size: 10,000 Contents: Diesel
 Tank #2 Size: _____ Contents: _____
 Tank #3 Size: _____ Contents: _____
 Tank #4 Size: _____ Contents: _____

- Tank closure permit has been obtained and is on site. Yes No
 - Any changes from approved closure plan? None
 - A 40 B:C fire extinguisher on site? Yes No
 - A residual material removed from tank? Yes No
- If yes, have residuals been properly contained for off-site transport? Yes No

Name of Facility and location: ECL-Richmond
 5. Observed receipt for dry ice? Yes No

	#1	#2	#3	#4
Number of pounds of dry ice in each tank?	<u>500</u>	<u>—</u>	<u>—</u>	<u>—</u>

6. Contractor has calibrated combustible gas detector in presence of inspector? Yes No
 Comments: Done this AM - according to contractor

7. Combustible gas readings/oxygen readings:
 Take three measurements, one near the top, center and bottom of tank and report the findings:

Tank #	# of Dry Ice	% LEL (top)	% LEL (mid)	% LEL (bottom)	% O ₂ (top)	% O ₂ (mid)	% O ₂ (bottom)	OK to remove?
1	<u>500</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>7.5</u>	<u>7.5</u>	<u>8</u>	<u>Yes</u>
2	<u>/</u>	<u>/</u>	<u>/</u>	<u>/</u>	<u>/</u>	<u>/</u>	<u>/</u>	<u>/</u>
3	<u>/</u>	<u>/</u>	<u>/</u>	<u>/</u>	<u>/</u>	<u>/</u>	<u>/</u>	<u>/</u>
4	<u>/</u>	<u>/</u>	<u>/</u>	<u>/</u>	<u>/</u>	<u>/</u>	<u>/</u>	<u>/</u>

Tank cannot be pulled if concentration of flammable vapors exceeds 20% of the LEL of the material in the tank or the oxygen concentration exceeds 5%. Per Removal Plan (5%) OK

8. After tank is removed, conditions of tank(s) and piping:

	Tank 1	Tank 2	Tank 3	Tank 4
Any corrosion or holes?	<u>No *</u>			
Was the tank wrapped?	<u>Yes</u>			
Any hydrocarbon vapors?	<u>None</u>			
Any discoloration of the soil in the tank pit or along piping trench?	<u>No</u>			

* Holes in top - occurred during excavation according to contractor (bucket scraping)
 Composition of backfill and other observations: Per Orange Mined W/Clay

* Very slight adjacent to samples S-2 & S-3 (No PID readings - IE. NO)

9. Was there evidence of contamination which would trigger the 24-hour release reporting requirements? Yes No
If yes, was a blank copy provided to site operator? Yes No

10. Has all obvious contamination been removed? Yes No

Describe details of approximately how much and where it will be disposed of? 12,200 GALLONS WASTE

STOCKPILED PADWATER SURFACE WASTES RESIDUES (3 SLEDS)

11. Is water observed in tank pit? Yes No If yes, a sample of the water must be taken.
Sample collected? Yes No

12. Soil samples must be collected in the tank pit under each end of the tank, a minimum of two feet into native soil.

Soil samples were collected according to the closure plan. Yes No

Soil samples were collected under piping at 20 ft. intervals and/or fittings. Yes No UNDER DISPOSAL

Samples of the stockpile were taken to determine disposal options. Yes No

13. The samples were properly taken? Yes No

The samples were properly sealed and labeled. Yes No

The chain of custody form was observed to be properly completed? Yes No

The samples were placed in an iced chest? Yes No

Name and location of analytical laboratory STL - Pasadena

14. The tank pit must be filled with soil or properly barricaded to prevent unauthorized access.

Was the tank pit filled with: new soil excavated backfill - OR -

Was the tank pit left open pending analytical results? Yes No

Was the tank pit covered/barricaded? Yes No

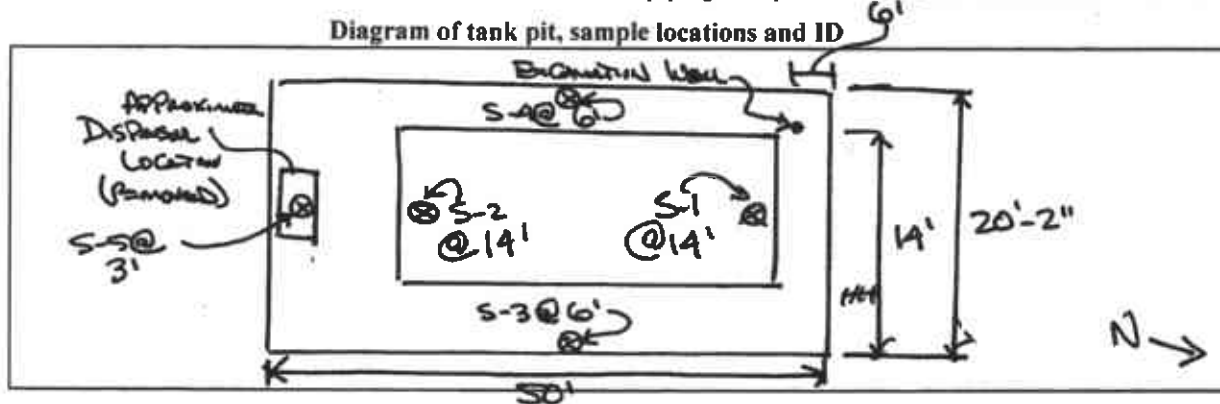
15. Tanks loaded onto hauler vehicle have identifying numbers spray painted on them? Yes No #31523

16. Hauler provides documentation of current certification as a hazardous waste hauler. Yes No

17. Manifest observed to be properly completed (name and address, EPA ID, hauler name, disposal site, signed and dated).

Name and address of disposal site: ECI - Richmond CA #23422823

18. Were all containers, residual materials, tanks and associated piping transported off site and manifested? Yes No



19. Tanks properly cleaned and certified if transported as non-hazardous waste? Yes No N/A

Signed Jan Ruff

Date: 4/16/04

Number of hours to complete: 2.5

Please Submit Closure Report By 6/16/04