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9:36 am, Oct 13, 2010

Alameda County  
Environmental Health

**Eric Frohnapple, P.E.**  
Project Manager  
Marketing Business Unit

**Chevron Environmental  
Management Company**  
6111 Bollinger Canyon Road  
San Ramon, CA 94583  
Tel (925) 543-5336  
Fax (925) 543-2324  
ericf@chevron.com

Alameda County Health Care Services  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577

Re: Former Chevron Service Station No. 30-7233  
2259 First Street  
Livermore, California

I accept the **Response to Request for Pilot Test Work Plan or Draft Corrective Action Plan** dated October 12, 2010.

I agree with the conclusions and recommendations presented in this document. The information included is accurate to the best of my knowledge, and appears to meet local agency and Regional Board guidelines. This **Response to Request for Pilot Test Work Plan or Draft Corrective Action Plan** was prepared by Conestoga Rovers & Associates, upon whose assistance and advice I have relied.

This letter is submitted pursuant to the requirements of California Water Code Section 13267(b)(1) and the regulating implementation entitled Appendix A pertaining thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Sincerely,

A handwritten signature in black ink that reads "Eric Frohnapple".

Eric Frohnapple, P.E.  
Project Manager

Attachment: Response to Request for Pilot Test Work Plan or Draft Corrective Action Plan



**CONESTOGA-ROVERS  
& ASSOCIATES**

5900 Hollis Street, Suite A  
Emeryville, California 94608  
Telephone: (510) 420-0700 Fax: (510) 420-9170  
<http://www.craworld.com>

October 12, 2010

Reference No. 312264

Mr. Jerry Wickham  
Alameda County Environmental Health Services  
1131 Harbor Bay Parkway, Suite 250  
Alameda, California 94502-6577

Re: Response to Request for Pilot Test Work Plan or Draft Corrective Action Plan  
Former Texaco Service Station 30-7233  
2259 First Street  
Livermore, California  
Fuel Leak Case RO0002908

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Dear Mr. Jerry Wickham:

Conestoga-Rovers & Associates (CRA) is submitting this response to the request for a Pilot Test Work Plan or Draft Corrective Action Plan (CAP) on behalf of Chevron Environmental Management Company (Chevron) for the site referenced above. In April 2010, CRA installed nine groundwater monitoring wells as proposed in as proposed in CRA's January 6, 2010 *Revised Work Plan for Well Installation*. Three are screened in a perched groundwater bearing zone between approximately 30 and 40 feet below grade (fbg) and six are screened in a deeper groundwater bearing zone from 54 to 59 fbg, as requested by the ACEH. In a letter dated July 26, 2010, Alameda County Environmental Health Services (ACEH) requested a Pilot Test Work Plan or Draft CAP without one year of groundwater monitoring and sampling data (Attachment A). CRA appreciates ACEH's request, however we believe it necessary to understand seasonal groundwater and hydrocarbon concentration fluctuations in the two monitored groundwater zones beneath the site prior to performing remedial pilot testing or evaluating potential remedial alternatives. Presented below are the site background and our technical comments to your request for a pilot test work plan.

## **SITE BACKGROUND**

The site is located on the eastern corner of First Street and South Livermore Avenue in Livermore, California (Figure 1). Currently the site is Mill Square Park, owned by the City of Livermore. The site is approximately 485 feet above mean sea level and regional topography slopes gently to the north. The park consists of grass and trees with a concrete walkway. Land use surrounding the park is primarily commercial.

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Equal  
Employment Opportunity  
Employer

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October 12, 2010

Reference No. 312264

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The earliest available aerial photograph from 1959 shows a station building located on the southern edge of the property and two dispenser islands located on the western portion of the property. The 1973 aerial photograph indicates that the station building and dispenser islands had been removed and only a paved lot remained. By 1978, the property had been redeveloped as a park (Figure 2). The park remains in the same configuration as shown on the 1978 aerial photo. To date, 31 soil borings, 6 soil vapor probes and 9 wells have been installed.

### **SITE GEOLOGY AND HYDROGEOLOGY**

According to the September 2005 *Groundwater Management Plan* prepared by the Zone 7 Water Agency (Zone 7), the site is located in the Mocho II Sub-Basin of the Main Livermore-Amadore Valley Groundwater Basin. Zone 7 Water Agency extracts groundwater from this basin for municipal drinking water. Sediments in this basin are described as recent alluvium consisting of sandy gravel and sandy clayey gravel from the surface to approximately 150 feet below grade (fbg). This alluvium overlies the Livermore Formation.

Sediments encountered beneath the site consist of silty sand, silty gravel and sandy gravel from the surface to approximately 9 fbg. Silts and clays are encountered between approximately 9 and 45 fbg. Sands and gravels are predominately encountered from approximately 45 fbg to the total depth explored of 62 fbg.

A current network of nine onsite and offsite wells monitor groundwater in two water-bearing zones that have been identified below the site; Zone A at approximately 28 to 40 fbg and Zone B at approximately 55 fbg. Zone A is believed to be a seasonal perched zone and is not horizontally continuous as it was only encountered in the southern and eastern portion of the site. Depth to groundwater has only been measured during the months of May and September 2010. In the shallow Zone A, groundwater ranged from approximately 28.5 to 36.5 fbg and flowed toward the southwest, and in the deep Zone B, groundwater ranged from approximately 30 to 38 fbg and flowed toward the northwest. A well construction summary table is included as Table 1.

### **TECHNICAL COMMENTS**

In a letter dated July 26, 2010, the ACEH requested that a Pilot Test Work Plan or Draft CAP be submitted by October 15, 2010, stating that "remedial alternatives can be developed and assessed without waiting for one year of groundwater monitoring data." CRA respectfully disagrees with this view and believes that one year of hydrologic data and dissolved hydrocarbon concentration trends in the two monitored groundwater zones are necessary to thoroughly evaluate all remedial options. To select an appropriate



October 12, 2010

Reference No. 312264

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remedial option to address hydrocarbon concentrations at varying depths it is critical that we collect four quarters of the following data:

- Groundwater flow direction at varying depths
- Horizontal and vertical groundwater gradients
- Seasonal groundwater depth fluctuations
- Hydrocarbon concentration trend data from each zone
- Determine hydrocarbon degradation rates in each zone
- Distribution of dissolved-phase petroleum hydrocarbons in each zone

This data may rule out some remedial options that do not merit feasibility testing or determine that each zone requires a different remedial option. In addition, without this data we will be unsure how to scale the appropriate equipment or inject the correct chemical or quantities of chemical to successfully complete a feasibility test. Therefore, it is still necessary to monitor and sample the new monitoring wells for at least four quarters. After four quarters of groundwater data is collected, CRA will further evaluate the appropriate remedial options and recommend an appropriate feasibility test.

CRA believes this is an appropriate approach which has been previously approved by the ACEH for the former Texaco at 930 Springtown Boulevard in Livermore (RO0000189). In a letter dated July 1, 2009 (Attachment B), the ACEH approved CRA's proposal to collect four quarters of groundwater data to assess groundwater conditions beneath the site prior to preparing and submitting a Pilot Test Work Plan or Draft CAP.

CRA respectfully requests the same management of this site, and allow for four quarters of groundwater monitoring and sampling data prior to evaluating and recommending the appropriate remedial option for this site. Additionally, the station was removed over 30 years ago, the orphan tank discovered in 2007 was also removed, and there are currently no known risks as indicated by the vapor assessments conducted in 2008 and 2009. Accordingly, CRA proposes to submit a pilot test work plan or draft CAP by May 1, 2011.



**CONESTOGA-ROVERS  
& ASSOCIATES**

October 12, 2010

Reference No. 312264

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We appreciate the opportunity to work with you on this project. Please contact Ms. Kiersten Hoey at (510) 420-3347 or Mr. Eric Frohnapple at (925) 543-2339 if you have any questions of concerns.

Sincerely,  
CONESTOGA-ROVERS & ASSOCIATES

Kiersten Hoey

Brandon S. Wilken, PG 7564



KH/doh/7

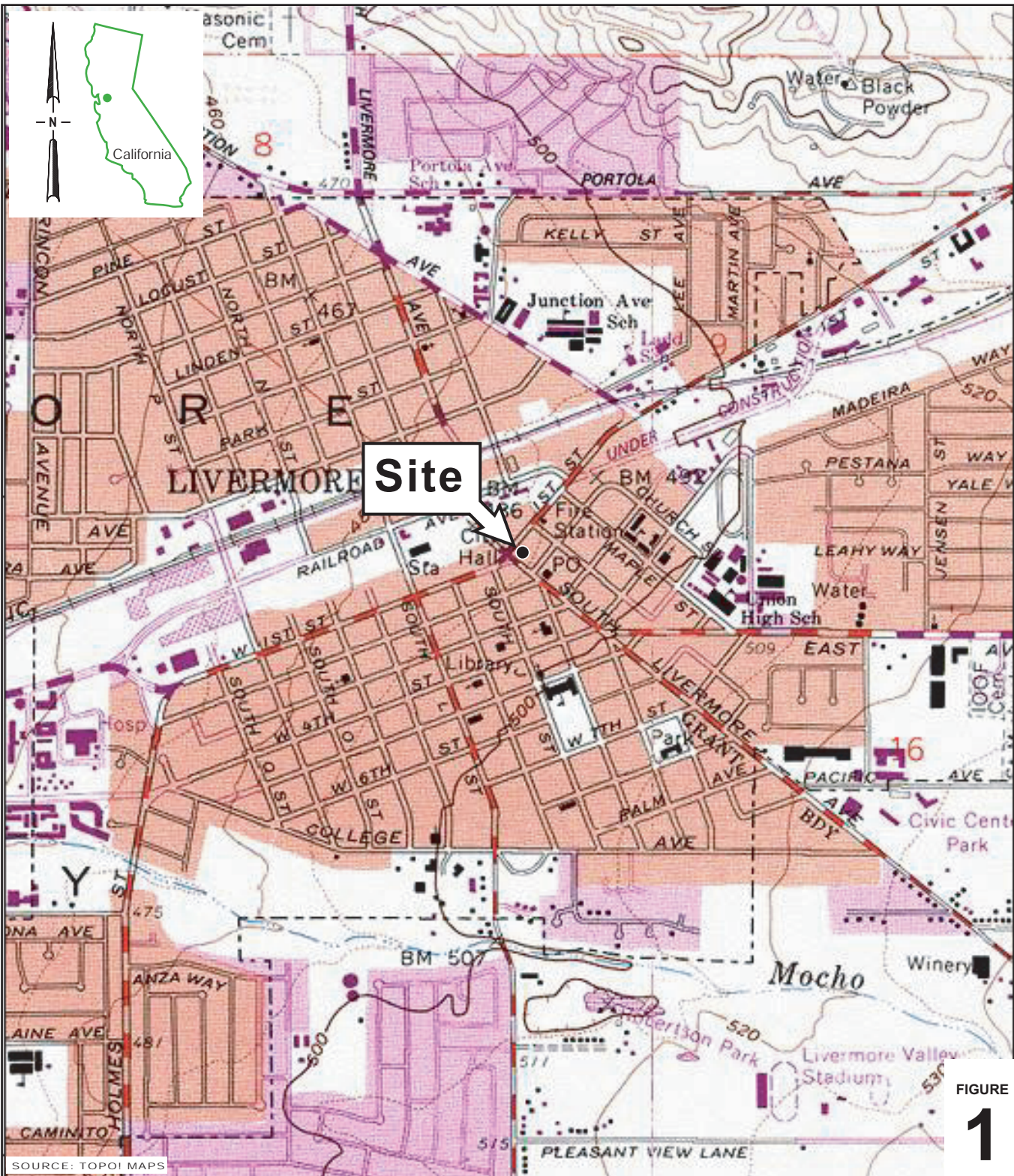
Encl.

Figure 1	Vicinity Map
Figure 2	Site Plan
Table 1	Well Construction Details
Attachment A	ACEH July 26, 2010 Letter
Attachment B	ACEH July 1, 2009 Letter

cc: Mr. Eric Frohnapple, Chevron Environmental Management Company  
Mr. Eric Uranaga, City of Livermore Economic Development

## FIGURES





L:\CHEVRON\307233 LIVERMORE\FIGURES\30-7233\_VICINITY\_MAP.AI

SOURCE: TOPOI MAPS

0 1/8 1/4 1/2 1  
SCALE : 1" = 1/4 MILE

**Chevron Service Station 30-7233**  
2259 First Street  
Livermore, California



**CONESTOGA-ROVERS & ASSOCIATES**

**Vicinity Map**



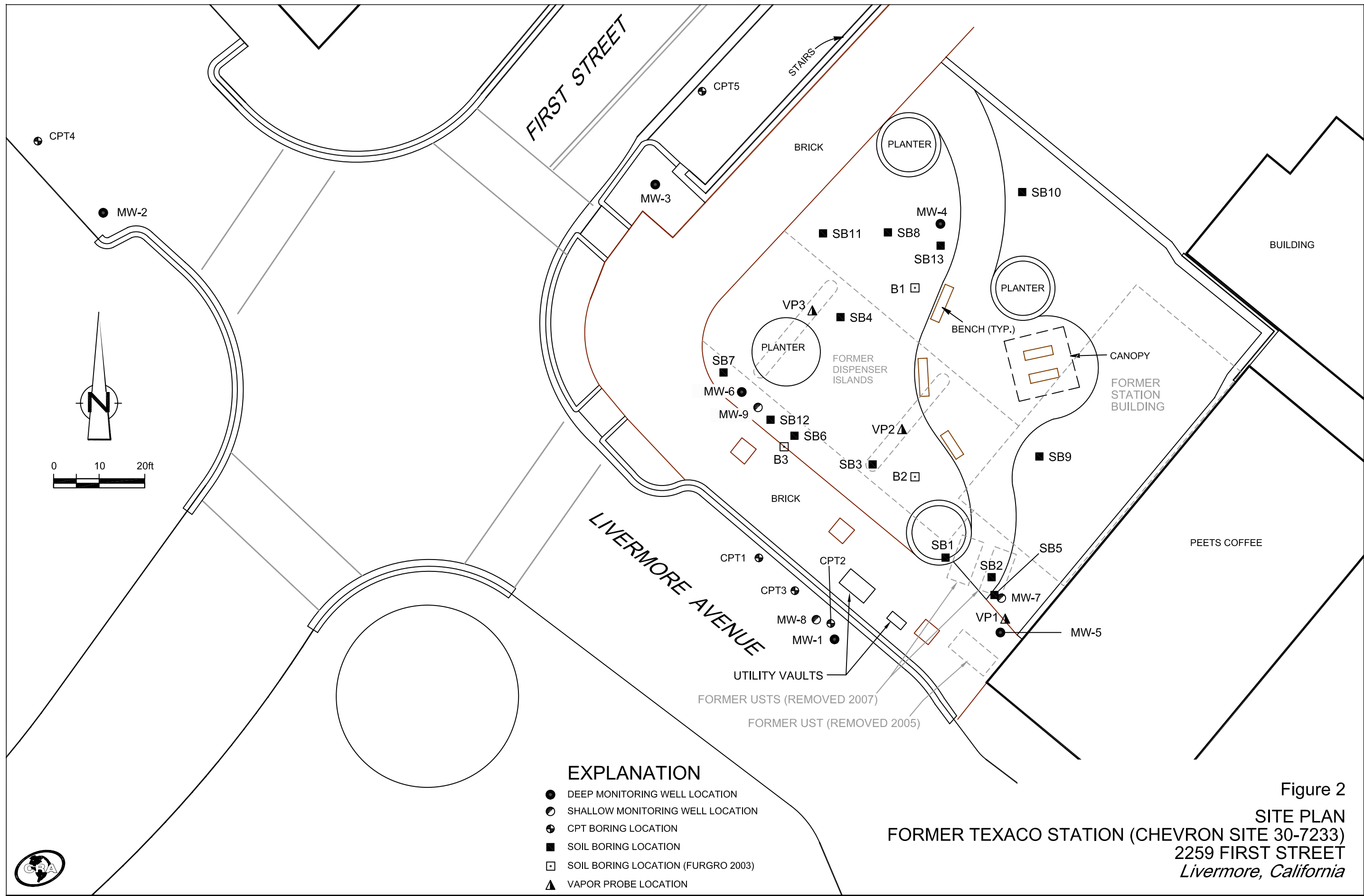


Figure 2  
 SITE PLAN  
 FORMER TEXACO STATION (CHEVRON SITE 30-7233)  
 2259 FIRST STREET  
 Livermore, California



## TABLE

**TABLE 1**  
**WELL CONSTRUCTION DETAILS**  
**FORMER TEXACO STATION 30-7233**  
**2259 FIRST STREET, LIVERMORE , CALIFORNIA**

<i>Well ID</i>	<i>Date Installed</i>	<i>TOC</i>	<i>Total Depth (fbg)</i>	<i>Casing Diameter (inches)</i>	<i>Screen Interval (fbg)</i>	<i>Zone</i>	<i>Status</i>
MW-1	4/7/2010	490.89	59	2	54-59	Zone B	<i>Active/New</i>
MW-2	4/5/2010	489.43	59	2	54-59	Zone B	<i>Active/New</i>
MW-3	4/6/2010	490.38	59	2	54-59	Zone B	<i>Active/New</i>
MW-4	4/12/2010	492.27	59	2	54-59	Zone B	<i>Active/New</i>
MW-5	4/8/2010	491.99	59	2	54-59	Zone B	<i>Active/New</i>
MW-6	4/9/2010	491.52	59	2	54-59	Zone B	<i>Active/New</i>
MW-7	4/8/2010	492.29	33	2	28-33	Zone A	<i>Active/New</i>
MW-8	4/7/2010	490.86	39	2	34-39	Zone A	<i>Active/New</i>
MW-9	4/9/2010	491.64	40	2	35-40	Zone A	<i>Active/New</i>

**Abbreviations/Notes:**

fbg = feet below grade

TOC = Top of casing elevation (feet above mean sea level)

TOC elevations for wells for all existing wells were surveyed by Morrow Surveying on April 19, 2010.

Zone A = Shallow perched water zone

Zone B = Deeper water zone

ATTACHMENT A

ACEH JULY 26, 2010 LETTER



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

July 26, 2010

Mr. Ian Robb (*Sent via E-mail to: [ianrobb@chevron.com](mailto:ianrobb@chevron.com)*)  
Chevron Environmental Management Company  
6001 Bollinger Canyon Road  
San Ramon, CA 94583-2324

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

Subject: Well Installation Report for Fuel Leak Case No. RO0002908 and Geotracker Global ID T0600196622, Miller Square Park, 2259 First Street, Livermore, CA 94550

Dear Mr. Robb and Ms. Davidson:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above referenced site including the most recently submitted document entitled, "*Well Installation Report, Former Texaco Station, 30-7233, 2259 First Street, Livermore, California,*" dated June 3, 2010, which was prepared on behalf of Chevron by Conestoga-Rovers & Associates. The Well Installation Report presents results from installation of monitoring wells MW-1 through MW-9. This work was proposed in a January 6, 2010, "*Revised Work Plan for Well Installation,*" and approved in an ACEH letter dated January 29, 2010.

We request that you address the following technical comments, perform the proposed work and send us the reports described below.

### **TECHNICAL COMMENTS**

1. **Cross Sections.** Thank you for presenting cross sections in the report. The cross sections were well done and quite useful for visualization of the site geology and contaminant distribution.
2. **Groundwater Monitoring.** We concur with the recommendation to conduct quarterly groundwater monitoring of the newly installed wells. The groundwater samples are to be analyzed for Total Petroleum Hydrocarbons (TPH) as diesel by EPA Method 8015B with silica gel cleanup, TPH as gasoline using EPA Method 8015B, and BTEX using EPA Method 8260B. Please present the results in the Groundwater Monitoring Reports requested below.
3. **Recommendations.** We do not concur with the recommendation to sample all wells for one year before evaluating the groundwater sampling data and conducting additional work. Remedial alternatives can be developed and assessed without waiting for one year of groundwater monitoring data. Therefore, we request that you submit a Pilot Test Work Plan or Draft Corrective Action Plan no later than October 15, 2010 following the second quarter groundwater sampling event.



Mr. Ian Robb  
Ms. Chris Davidson  
RO0002908  
July 26, 2010  
Page 2

### **TECHNICAL REPORT REQUEST**

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

- **August 16, 2010** – Groundwater Monitoring Report – Second Quarter 2010
- **October 10, 2010** – Groundwater Monitoring Report – Third Quarter 2010
- **October 15, 2010** – Pilot Test Work Plan or Draft Corrective Action Plan
- **January 10, 2011** – Groundwater Monitoring Report – Fourth Quarter 2010
- **April 10, 2011** – Groundwater Monitoring Report – First Quarter 2011

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org).

Sincerely,

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

Attachment: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Cheryl Dizon, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway  
Livermore, CA 94551 (Sent via E-mail to: [cdizon@zone7water.com](mailto:cdizon@zone7water.com))

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street  
Pleasanton, CA 94566 (Sent via E-mail to: [DStefani@lpfire.org](mailto:DStefani@lpfire.org))

John Rigter, Livermore-Pleasanton Fire Department, 3560 Nevada Street  
Pleasanton, CA 94566 (Sent via E-mail to: [jrigter@lpfire.org](mailto:jrigter@lpfire.org))

Brandon Wilken, Conestoga-Rovers & Associates, 5900 Hollis Street, Suite A  
Emeryville, CA 94608 (Sent via E-mail to: [BWilken@crworld.com](mailto:BWilken@crworld.com))

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

Attachment 1  
**Responsible Party(ies) Legal Requirements/Obligations**

**REPORT REQUESTS**

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

**ELECTRONIC SUBMITTAL OF REPORTS**

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

**PERJURY STATEMENT**

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

**PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS**

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

**UNDERGROUND STORAGE TANK CLEANUP FUND**

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

**AGENCY OVERSIGHT**

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>ISSUE DATE:</b> July 5, 2005
	<b>REVISION DATE:</b> July 8, 2010
	<b>PREVIOUS REVISIONS:</b> December 16, 2005, October 31, 2005
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

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

#### REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:  
RO#\_Report Name\_Year-Month-Date (e.g., RO#5555\_WorkPlan\_2005-06-14)

#### Additional Recommendations

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

#### Submission Instructions

- 1) Obtain User Name and Password:
  - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
    - i) Send an e-mail to [dehloptoxic@acgov.org](mailto:dehloptoxic@acgov.org)
    - Or
    - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Teena Le Khan.
  - 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 Page on upper right side of browser, and then scroll down to Open FTP Site in Windows Explorer.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
  - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
  - a) Send email to [dehloptoxic@acgov.org](mailto:dehloptoxic@acgov.org) notify us that you have placed a report on our ftp site.
  - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
  - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
  - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.

ATTACHMENT B

ACEH JULY 1, 2009 LETTER



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY  
DAVID J KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-93

July 1, 2009

Mr Ian Robb  
Chevron Environmental Management Company  
6001 Bollinger Canyon Rd , K2256  
San Ramon, CA 94583-2324

Mr Ken Hilliard  
Environmental Services  
7-Eleven, Inc  
One Arts Plaza, 1722 Routh St , Suite 1000  
Dallas, TX 75201

Subject Fuel Leak Case No RO0000189 and Geotracker Global ID T0600101353, Chevron #21-1253/Texaco, 930 Springtown Boulevard, Livermore, CA 94550

Dear Mr Robb and Mr Hilliard

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site, including the recently submitted correspondence entitled, "*Response to Request for Pilot Test Work Plan of Draft Corrective Action Plan*," dated June 19, 2009. In correspondence dated April 10, 2009, ACEH approved the installation and sampling of the proposed monitoring wells and requested that you prepare a Pilot Test Work Plan or Draft Corrective Action Plan to initiate site cleanup. The June 19, 2009 correspondence, which was prepared on Chevron's behalf by Conestoga-Rovers & Associates, presents a discussion of the rationale for collecting groundwater monitoring data for a one year period prior to evaluating remedial options in a Corrective Action Plan (CAP).

Based on the rationale presented in the June 19, 2009 correspondence, the proposal to collect groundwater monitoring data for a period of one year to assess current groundwater conditions is acceptable. A Pilot Test Work Plan or Draft CAP is to be prepared following the collection of four quarters of groundwater data from the recently installed six monitoring wells.

**TECHNICAL REPORT REQUEST**

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

- **August 19, 2009** – Monitoring Well Installation Report
- **30 days following end of each quarter** – Groundwater Monitoring Report
- **August 19, 2010** – Pilot Test Work Plan or Draft Corrective Action Plan

Mr Ian Robb  
Mr Ken Hilliard  
RO0000189  
July 1, 2009  
Page 2

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](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.

Mr Ian Robb  
Mr Ken Hilliard  
RO0000189  
July 1, 2009  
Page 3

### **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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If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org)

Sincerely,



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

Enclosure ACEH Electronic Report Upload (ftp) Instructions

cc Cheryl Dizon, 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

Charlotte Evans, Conestoga-Rovers & Associates, 5900 Hollis Street, Suite A,  
Emeryville, CA 94608

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

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

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

#### REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection** (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:  
RO#\_Report Name\_Year-Month-Date (e.g., RO#5555\_WorkPlan\_2005-06-14)

#### Additional Recommendations

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

#### Submission Instructions

- 1) Obtain User Name and Password
  - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
    - i) Send an e-mail to [dehloptoxic@acgov.org](mailto:dehloptoxic@acgov.org)
    - Or
    - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of 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](mailto:dehloptoxic@acgov.org) notify us that you have placed a report on our ftp site
  - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org (e.g., firstname.lastname@acgov.org)
  - c) The subject line of the e-mail must start with the RO# followed by **Report Upload** (e.g., Subject: RO1234 Report Upload). If site is a new case without an RO# use the street address instead.
  - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.