



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

August 25, 2009

Mr. James Gotcher
City of Pleasanton Public Works
P.O. Box 520
Pleasanton, CA 94566-0802

Subject: Fuel Leak Case No. RO0002938 and Geotracker Global ID T0600194363, City of Pleasanton Fire Station #3, 3200 Santa Rita Road, Pleasanton, CA 94566 – Technical Comments on Site Assessment Report

Dear Mr. Gotcher:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site, including the recently submitted document entitled, "*Additional Phase II Environmental Site Assessment of Fire Station No. 3, 3200 Santa Rita Road, Pleasanton, California,*" dated June 30, 2009. The Site Assessment Report, which was prepared on behalf of the City of Pleasanton by Kleinfelder, presents soil and groundwater sampling results from five soil borings advanced at the site in March 2009. The report recommends no further action at the site based on several conclusions. Prior to evaluating whether no further action is appropriate for the site, we request that you address the following technical comments on the conclusions stated in the Site Assessment Report.

We request that you submit responses to the following technical comments **no later than October 25, 2009.**

TECHNICAL COMMENTS

- 1. Shallow Water Bearing Zone.** The Site Assessment Report concludes that the shallow water-bearing zone beneath the former USTs is impacted with TPH but has been well defined and is very limited in aerial extent. Groundwater was encountered in boring SR-2 at or above 40 feet bgs but was not encountered in other borings at the site. Groundwater is present at depths less than 40 feet bgs in several wells at the service station (3192 Santa Rita Road) located approximately 150 feet south of the site. Please review the boring logs and methods for drilling and of sampling borings at the site to potentially explain the absence of groundwater in the five borings advanced in March 2009. Please present this discussion in the Response to Comments requested below.
- 2. Source of TPHd and TPHmo in Groundwater.** We do not concur that sufficient data are available to conclude that groundwater in the deeper zone has not been impacted by the former on-site USTs. Soil data from below the USTs indicate that a residual source of TPHd and TPHmo remains in the area below the former on-site USTs. A grab groundwater sample from SR-1 indicates that shallow groundwater below the former USTs is significantly impacted. Based on several years of groundwater monitoring south of the site at 3192 Santa Rita Road, the predominant groundwater flow direction in the deeper zone is to the south. Based on these considerations, the detections of TPHd and TPHmo in the deeper zone are more likely related to downward migration of contamination from the on-site UST area. We request that you review site conditions and assess the need for further action based upon the TPHd and TPHmo contamination detected in the deeper zone more likely

originating from the on-site USTs. Please present this evaluation in the Response to Comments requested below.

3. **Comparison of TPHmo and TPHd Concentrations in Groundwater.** A comparison of the ratios of TPHd and TPHmo in grab groundwater samples cannot be the basis for concluding that groundwater contamination is from an off-site source. The ratio of TPHd and TPHmo would be unlikely to remain constant at a site given the expected variable effects of contaminant transport and degradation between source area and plume across a site. Please do not include discussion of comparisons of the ratios of TPHd to TPHmo in groundwater samples in the Response to Comments requested below.

TECHNICAL REPORT REQUEST

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

- **October 27, 2009** – Response to Comments

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

ELECTRONIC SUBMITTAL OF REPORTS

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

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is

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true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

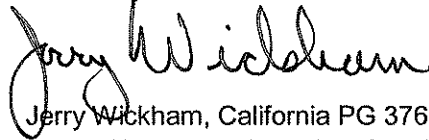
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

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

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at 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

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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

James Lehrman, Kleinfelder, 7133 Koll Center Parkway, Suite 100, Pleasanton, CA 94566

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

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

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

REQUIREMENTS

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

Additional Recommendations

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

Submission Instructions

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