



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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August 14, 2009

Mr. Jeff LeBow
East Bay Regional Parks District
17930 Lake Chabot Road
Castro Valley, CA 94546

Subject: Request for Work Plan Modification, Spills, Leaks, Investigations and Cleanup (SLIC) Case No. RO0002963 and Geotracker, Global ID # T0619715536, EBRPD Lake Chabot Marine Maintenance Yard, 17930 Lake Chabot Road, Castro Valley, CA 94546

Dear Mr. LeBow:

Alameda County Environmental Health (ACEH) staff has received the *Work Plan for Environmental Site Investigation of a Diesel Release from an Above Ground Storage Tank*, dated June 15, 2009, and submitted on your behalf by Kleinfelder. Alameda County Environmental Health (ACEH) staff has reviewed the document and are in general agreement with the approach outlined in the work plan; however, request that you address the following technical comments and send us the documents described below.

TECHNICAL COMMENTS

1. The referenced work plan indicates that four direct push (Geoprobe) soil bores will be installed around the former location of the aboveground storage tank (AST) at locations specified in the work plan, but that locations may move due to surface impediments such as overhead or underground utilities and accessibility. As currently situated the number of bores around the AST are more than adequate; however, it also appears warranted that a minimum of two additional bores should be installed to confirm the vertical extent of hydrocarbon impacts associated with soil samples collected along piping runs.
2. The work plan also states that the borings will be installed up to a depth of 16 feet below grade surface (bgs), unless bedrock or groundwater is encountered first. The site is noted to sit on a ridge top and that bedrock is expected to be shallow. This is substantiated by existing AST removal photographs in the file that suggest a rocky soil. Consequently, because Geoprobe systems have difficulty achieving depth in coarsely granular or rocky soil, it would appear warranted to have a contingency to allow a switch to hollow-stem auger (HSA) drilling capabilities, either in-field or a later mobilization. As a consequence ACEH is requesting modification of the work plan to include this contingency and the inclusion of appropriate HSA drilling and sampling methodology. This can be done in an addendum.

3. The work plan also indicates Total Petroleum Hydrocarbons as gasoline (TPHg) will be included in the analysis. Because this was a heating oil tank analysis for TPHg does not appear necessary. File photographs also indicate the area does not appear to be underlain by organic rich soil, thus inclusion of silica gel cleanup for the heavier hydrocarbon compounds may not be warranted.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Mark Detterman), according to the following schedule:

- **October 30, 2009** – Revised Work Plan or addendum

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

ELECTRONIC SUBMITTAL OF REPORTS

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

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

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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.

Should you have any questions, please contact me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,



Mark E. Detterman, PG, CEG
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Jeffrey Gravesen, Kleinfelder, 4670 Willow Road, Suite 100, Pleasanton, CA
94566-3101