

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY, SUITE 250
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

August 11, 2017

Mr. Ernie Lee
Marina Faire, Shopping Center
3271 South Highland Drive, Suite 704
Las Vegas, NV 89109
(Sent via electronic mail to: ernestlee@gmail.com)

Subject: Request for Additional Actions and Conditional Work Plan Addendum Approval; Site Program Case No. RO0003155 and Geotracker Global ID T10000006425, Four Seasons Cleaners, 13778 Doolittle Drive, San Leandro, CA 94577

Dear Mr. Lee:

Alameda County Department of Environmental Health (ACDEH) staff have reviewed the *Work Plan Addendum*, dated July 31, 2017 which was submitted on your behalf by RRM, Inc. Thank you for submitting the work plan. The work plan was prepared the recent discovery of Dense Non Aqueous Phase Liquids (DNAPL) concentrations in soil during implementation of interim remedial actions performed in conjunction with tenant Americans With Disability Act (ADA) improvements at the site. Interim removal actions were presented in the *IRM, Vapor Mitigation, and FS Work Plan*, (IRAP) dated September 19, 2016 and prepared by Well Test Inc. on your behalf. Portions of the IRAP were conditionally approved by ACDEH on November 21, 2016, and subsequent to further correspondence, dated December 21, 2016, and a stakeholder meeting on March 8, 2017, to discuss the site and the IRAP, additional portions of the IRAP were approved by ACDEH on March 17, 2017.

Implementation of interim remedial actions were conducted in conjunction with tenant improvements for ADA bathrooms, including sanitary sewer modifications. Elements of the approved IRAP that were implemented when a portion of the slab was removed for ADA improvements, included targeted excavation of contaminated soil and the installation of a horizontal vapor extraction network and a subslab depressurization system beneath the slab. In an effort to meet time constraints imposed by the ADA improvements, ACDEH additionally approved installation of Air Sparging / Soil Vapor Extraction (AS/SVE) wells for future pilot tests for determining the effectiveness of remediating dissolved phased Halogenated Volatile Organic Compounds (HVOCs), including Tetrachloroethene (PCE) and Trichloroethene (TCE). ACDEHs approval for the start of AS/SVE pilot test was contingent upon receiving results of the targeted soil excavation. The IRAP additionally proposed the installation of three groundwater monitoring wells and one deep soil bore to explore site vertical lithology, and paired subslab and vapor wells.

During the excavation ACDEH was notified by Brian Kelleher of the potential for much more significant contamination than was planned for based on field instrument screening, and protective measures were being implemented including tenting the excavation and mobilizing a mobile blower and carbon unit.

Subsequent to this notification, ACDEH was contacted by Julie Avanto with RRM requesting approval of the installation of additional bores to evaluate the extent and magnitude of the source area. Prior to approving the request, ACDEH requested submittal of a work plan documenting the analytical data collected during soil excavation, and the additional requested scope of work discussed. The requested work plan was received by ACDEH on Friday August 4, 2017, and documented PCE and TCE DNAPL concentrations of 7,000 milligrams per kilogram (mg/kg) and 190 mg/kg, respectively, in soil at 1 ft bgs in the vicinity of a drain. Additionally, PCE and TCE concentrations in confirmation samples collected from the bottom of the planned excavation at a depth of 7 feet bgs (due to structural and equipment limitations) were 2,300 mg/kg and 6.1 mg/kg, respectively. On Monday August 7, 2017, ACDEH requested a meeting with site representatives to observe site conditions and discuss the path forward for evaluating potential vapor intrusion risks, and additional source characterization.

On August 8, 2017, ACDEH (Dilan Roe [Chief, Land and Water Division], Paresh Khatri (Program Manager, LOP and SCP Programs), and myself) additionally meet or spoke with members of your team including Brian Kelleher of Kelleher & Associates, and Julie Avanto and Matt Paulus of Remediation Risk Management, Inc (RRM) to discuss the status of the site. These discussions occurred at the site, on the phone, and in our office, at separate times. Based on these conversations, RRM has informed ACDEH that the previously proposed AS/SVE remedial option has been eliminated, but may include SVE in some capacity. This change is based on the presence of substantial amount of clay beneath the site, as well as the discovery of significant contaminant concentrations beneath the site, as discussed below.

The referenced work plan proposed the installation of four Cone Penetrometer Test (CPT) bores in the parking lot to the southwest of the subject commercial suite at the subject site, and one CPT bore to the south of the release to attempt to define the extent in that direction. The CPT bores will additionally be used to assist in identifying site stratigraphy and water-bearing zones. Additionally, a CPT bore, using Membrane Interface Probe (MIP) technology, is proposed to be installed at the release location in an attempt to identify Dense Non Aqueous Phased Liquids (DNAPL) that may be present beneath the site based on the discovery of substantial contamination discussed below. The MIP will additionally be used at select bores to be located in the parking lot or to the south of the release.

Based on ACDEH staff discussions with your team, and review of the work plan, ACDEH requests further immediate actions at the site as discussed below to evaluate potential vapor intrusion risks due to HVOCs in soil and groundwater at the site. Additionally, with the exception of the air sparge wells, ACDEH requests that the scope of work previously approved in the ACDEH letter dated March 17, 2017 be implemented provided the technical comments below are incorporated.

Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide at least a 48-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- 1. Dry Cleaner Site History** – Documents in the case file do not adequately identify the history of the dry cleaner operations at the site, including dry cleaning equipment configurations, when dry cleaning equipment was removed, or PCE using machines were replaced with hydrocarbon-based machines in sufficient detail. The *Report of Limited Phase II Soil, Water and Soil Vapor Investigation*, dated September 2, 2014, prepared by PEIRS Environmental Services, Inc, states that the existing dry cleaning machine at the time of the Phase II investigation uses ECOSOLV, a hydrocarbon-based solvent. The report states that based on historical data, this location was the location of the pre-2000 dry cleaning machine that used PCE. The report entitled *Indoor Air Sampling Work Plan* dated Feb 5, 2016, prepared by Well Test, Inc, refers to current and/or historic dry cleaning operations at the site. The *Air Sampling Results Notification* report, dated Feb 8, 2016, prepared by Well Test Inc, refers to the dry cleaners as the former Four Season Cleaners and references the former dry cleaner location. Please submit detailed documentation, by the date identified below, on the history of dry cleaning operations, including any data and/or figures gleaned from of historic Hazardous Materials Business Plan from the San Leandro CUPA.
- 2. Site and Vicinity Maps** – Documents in the case file do not adequately depict the site and vicinity configuration. The former Four Seasons dry cleaner is located within a strip mall on APN No. 80G-931-1-5 within a mixed use neighborhood. The parcel is located on the block bound by Doolittle Drive on the southwest, Fairway Drive on the northwest, and Catalina Street to the northeast, and commercial property to the southeast. The total parcel consists of a rectangular parcel of approximately 5.5 acres in size which is improved with a strip mall building, with a separate restaurant building totaling

approximately 71,026 sq. feet. Based on a discussion with RRM, the DNAPL concentrations of PCE and TCE in soil were located adjacent to a hole in a deteriorated iron P-trap that was located within a sewer line servicing in the tenant space. ACDEH understands that the configuration of the sewer alignment did not match that shown on the work plan figures. ACDEH additionally understands that sewer modifications were conducted in association with ADA improvements. Based on the DNAPL concentrations it appears that historic drain was used to dispose of PCE to the sanitary sewer.

- a. **Sanitary Sewer Information** - Please prepare site and vicinity figures showing the current configuration of the sewer in the tenant space, and the alignment of the sewer main that it connects to. ACDEH requests identification of manholes, cleanouts, laterals, utility depths, and flow directions on the figures in order to help assess sewer sampling locations and potential sensitive receptors to chlorinated solvents that were disposed of in the sewer.
 - b. **Preferential Pathway (Other Utilities) Locations** – In that utility lines can act as preferential pathways for vapor migration due to the general use of granular backfills, ACDEH requests that all underground preferential pathways, not necessarily limited to active or inactive utility lines, be located beneath the strip mall building (not limited to the subject suite and adjacent suites, but expanding as necessary), and extending to and beyond property lines for the subject parcel, to the utility mains beneath vicinity streets. Please also identify the location of any above ground utilities in order to account for all potential utility conduits service the site.
 - c. **Tenant Space Information** – ACDEH requests that information be provided on site figures and supporting documentation include current tenant occupants of the strip mall and hours of operations. Additionally ACDEH requests information on the HVAC systems in operations for each adjacent tenant suites as well as documentation of HVAC system modifications (i.e. fresh air intakes, etc.) that are reported to have been recently installed as mitigation measures due to potential vapor intrusion risk to adjacent suites at 13770 and 13778 Doolittle Avenue. Documentation should include HVAC equipment location on the roof, as the recently installed subslab venting system in the former dry cleaner tenant space will require the installation of a riser to vent subsurface vapors to outside air at the roof level.
 - d. **Adjacent Parcel Information** – Please identify the type of use (i.e. commercial, residential, etc.) of parcels adjacent to the site in all four cardinal directions.
3. **Indoor and Outdoor Air, and Subslab Sampling** – In order to assess the risk of vapor intrusion to indoor air in the former dry cleaner space subsequent to Interim Remedial Actions and ADA tenant improvements, and the adjacent dentist suite that had a previous air sample with HVOCs above screening levels for vapor intrusion to indoor air, ACDEH requests concurrent collection of indoor air and outdoor air samples and subslab vapor samples in these tenant spaces. ACDEH notes that the indoor air sample located in the dentist office (IA-9-2) with documented PCE concentrations in indoor air is located adjacent to the drain where DNAPL concentrations were discovered in the former dry cleaner suite. The collection of concurrent samples will help determine interference from other chemicals in indoor air as well as provide information to calculate site specific attenuation factors across the concrete slab. One outdoor air sample has been collected at the site and contained PCE and TCE concentrations of 1,500 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) and 32 $\mu\text{g}/\text{m}^3$ of TCE. The outdoor air sample must be located sufficiently upgradient of the former dry cleaner to obtain representative samples that are not biased from the release from this site. At this time, and based on previous indoor air sample concentrations, ACDEH requests the collection of 24-hour indoor and outdoor air samples in the subject suite and in the dentist office. This effort may require initial efforts in the dentist's suite due to the lack of a concrete slab in the subject suite. Samples should be located in areas previously sampled in order to allow comparisons to previously collected data. ACDEH requests the samples be analyzed on a rush basis. Additional step out samples may be required in adjacent suites depending on the results of the initial sampling and the delineation of soil gas and groundwater impacts at the site.

4. **Sewer Gas Sampling** – Because of the magnitude of contamination documented in soil beneath the broken drain at the site, and the high probability that substantially more PCE liquid flowed through the sewer than the amount that exited the sewer at the location of the drain, ACDEH requests the collection of direct sewer gas sampling at cleanouts or sewer manholes in order to trace potential PCE liquids beneath the site and offsite areas, as necessary. It is likely appropriate to work outward in an effort to identify the primary flow pathway route. In pending California regulatory guidance changes to be promulgated by the DTSC and the RWQCB, sewer vapor sampling is a “Primary Line of Evidence” which will be incorporated into all vapor investigations before the end of the year, and due to the nature of this release, it is appropriate to incorporate the technique at the site at this time.
5. **Real Time Soil Vapor Plume Delineation** – Due to the DNAPL concentrations in soil, and the apparent release to the sewer line it is a priority to delineate HVOC impacts to soil, soil vapor, and groundwater and the associated vapor intrusion risk to building occupants. As discussed with RRM on August 8, 2017, ACDEH is in agreement with a rapid-assessment soil vapor survey in order to define the extent of soil vapor contamination, as a first step. The intent is to identify the extent of soil vapor contamination in order to assist in the delineation of soil gas and groundwater concentrations above San Francisco Bay Regional Water Quality Control Board (RWQCB) TCE trigger levels for indoor air sampling. Consequently, this assessment is requested to incorporate real-time analytical analysis which a mobile lab can provide to enable identification of rapid and appropriate step-out bore locations, as needed. In addition to identifying the areal extent of groundwater impacts, ACDEH requests that soil vapor sampling also be conducted along the sewer alignment to assess contamination in the backfill of the sanitary sewer from disposal of PCE in the sewer (this is separate from sewer gas sampling).
6. **Real-Time Groundwater Plume Delineation** – As discussed with RRM, and subsequent to the collection of soil vapor data, ACDEH requests the real-time groundwater plume delineation investigation to define the downgradient and lateral extent of groundwater contamination above RWQCB TCE trigger levels which require immediate indoor air vapor sampling in buildings overlaying trigger-level concentrations.
7. **Work Plan Submittal** – Please prepare a work plan to address the items requested above. The referenced work plan proposed a series of actions with which ACDEH is in agreement of undertaking. Please submit a report by the date identified below.
 - a. **SOPs** - Please ensure that your standard operating protocols (SOPs) are included in the work plan; however, the work plan can be as limited as a figure of potential sample locations, to be modified in the field, your SOPs, and appropriate text to convey necessary information. Please ensure vapor shrouds and a tracer are proposed for use, and that shroud tracer concentrations are proposed to be collected at each vapor sample location.
 - b. **Environmental Screening Level Detection Limit Goals** - Please ensure the detection limits are below Environmental Screening Levels (ESLs) as promulgated by the RWQCB.
8. **Implementation of Previously Approved Scope of Work** – ACDEH request that the scope of work previously approved by ACDEH in the March 17, 2017 directive letter and the work plan addendum dated July 31, 2017, be implemented with the exception of the air sparge wells. ASSVE is not an appropriate technology for DNAPL.
9. **Meeting Request** – Subsequent to the soil vapor sampling investigation, ACDEH requests a meeting of stakeholders to review the results of the Interim Remedial Excavation and the soil vapor survey, to identify future steps, including the identification of potential indoor receptors overlaying soil vapor or potential groundwater contamination over RWQCB trigger levels that require immediate indoor air vapor sampling.
10. **Geotracker Electronic Report and Data Upload Compliance** – A review of the case file and the State’s Geotracker database indicates that the site is not in compliance with previous directive letters.

Compliance is also a State requirement. Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs, including SLIC programs. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites was required in GeoTracker.

At present missing data and documents include, but may not be limited to, older EDF submittals. Please see Attachment 1 for limited additional details, and the state GeoTracker website for full details. ACEH requests notification of, and a list of, the documents uploaded to Geotracker. Please upload all submittals to GeoTracker as well as to ACEH's ftp website by the date specified below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below, according to the following schedule:

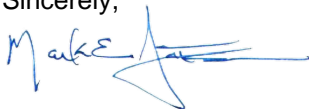
- **August 31, 2017** – Work Plan
File to be named: RO3155_MISC_R_yyyy-mm-dd
- **September 15, 2017** – Indoor Air Data Transmittal
Please email your case worker
- **September 15, 2017** – Identification of Meeting Dates
Please email your case worker
- **September 15, 2017** – Report on Status of Tenant Spaces and Improvements
File to be named: RO3155_CORRES_R_yyyy-mm-dd
- **October 15, 2017** – Soil Vapor / Subsurface Investigation Status Update / Transmittal
Please email your case worker

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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

If you have any questions, please do not hesitate to call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,



Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations
Electronic Report Upload (ftp) Instructions

Mr. Ernie Lee
RO0003155
August 11, 2017, Page 6

cc: Greg Lee, 3271 S. Highland Drive, Suite 704, Los Vegas, NV 89109; (Sent via electronic mail to: glee@eirekamesquite.com)

Julie D'Hondt, Marina Faire, LP, 3271 S. Highland Drive, Suite 704, Las Vegas, NV 89109; (Sent via electronic mail to: highlandofficelv3@gmail.com)

Brian Kelleher, 2099 Wendover Lane, San Jose, CA 95121; (Sent via electronic mail to: bkelleher@ix.netcom.com)

Julie Avanto, RRM, 2560 Soquel Avenue #202, Santa Cruz, CA 95062; (Sent via electronic mail to: julie@rrmsc.com)

Sady Hayashida, Hayashida Architects, 832 Bancroft Way, Berkeley, CA 94710; (Sent via electronic mail to: sadyh@hayashida-architects.com)

Buzz Butler, Lake Street, 601 Van Ness Avenue, San Francisco, CA 94102; (Sent via electronic mail to: buzz@lakestreetventures.com)

Dilan Roe, ACDEH, (Sent via electronic mail to: dilan.roe@acgov.org)

Paresh Khatri, ACDEH; (Sent via electronic mail to: paresh.khatri@acgov.org)

Mark Detterman, ACDEH, (Sent via electronic mail to: mark.detterman@acgov.org)

Electronic File; GeoTracker

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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) 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 File Transfer Protocol (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 SCP 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 (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/) for more information on these requirements.

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the SWRCB's GeoTracker website." 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 6731, 6735, and 7835) 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 licensed 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 case meet this requirement. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, late 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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 1, 2016
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions


The Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) 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

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- 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)

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 deh.loptoxic@acgov.org.
 - 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) Open File Explorer using the Windows  key + E keyboard shortcut.
 - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) On the address bar, type in ftp://alcoftp1.acgov.org.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
 - d) Click Log On.
 - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - f) 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 deh.loptoxic@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.