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Mr. Dallas Nelson GP Holdings LLC 5977 Keith Avenue Oakland, CA 94618-1545

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ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

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

REBECCA GEBHART, Interim Director

September 22, 2017 Revised

Mr. David E. Murray
PCC Flow Technologies Holdings, Inc.
4600 SE Harney Drive
Portland, OR 97206-0898
(Sent via electronic mail to:
DMurray@precastcorp.com)

Mr. Dallas Nelson GP Holdings LLC 5977 Keith Avenue Oakland, CA 94618-1545 Mr. Harold Mark Vignoles 9201 San Leandro LLC 9201 San Leandro Street Oakland, CA 94603 (Sent via electronic mail to: mark@servicewest.com)

Mr. David Murray
PCC Precision Castparts Corp.
4650 SW Macadam Avenue, #400
Portland, OR 97239
(Sent via electronic mail to:
DMurray@precastcorp.com)

Subject:

Request for Geotracker Uploads; Fuel Leak Case No. RO0000320 and Geotracker Global ID T0600101592, PACO Pumps Inc, 9201 San Leandro Street, Oakland, CA 94603

Dear Messrs. Murray, Vignoles, and Nelson:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file, including the work plan contained in the *Former Paco Pumps Site*, dated July 25, 2017. The report was prepared and submitted on your behalf by The Source Group (SGI) of Signal Hill, California. Thank you for submitting the report.

TECHNICAL COMMENTS

1. 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, recent reports, GEO WELL data, associated EDF submittals, GEO MAPS, and recent bore logs. The most recent EDF upload to Geotracker, dates to the Second Quarter of 2013, and there are limited older reports prior to 2012. Older reports for the site can be downloaded from the ACDEH website. The upload of current as well as historic site data and reports is a State requirement, and will eventually delay case closure. Compliance is also tied to reimbursement funding by the UST Cleanup Fund. ACDEH will respond to the work plan once it is uploaded and accepted on Geotracker.

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.