RECEIVED
By dehloptoxic at 8:44 am, Oct 31, 2006

Treadwell&Rollo

30 October 2006
Project 3494.01

Steven Plunkett
Hazardous Materials Specialist
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, 2nd Floor
Alameda, CA 94502

Subject: Work Plan: Supplemental Soil and Groundwater Investigation
Fuel Leak Case No. RO0000052
Former Peterson Manufacturing Company Facility
1600 63rd Street
Emeryville, California

Dear Mr. Plunkett:

This Work Plan has been prepared by Treadwell & Rollo, Inc. on behalf of Wareham Property Group and 1600 63rd Street Associates, for submittal to the Alameda County Environmental Health Department (ACEH), as requested in its 28 September 2006 letter. The Work Plan describes field investigation activities proposed for the former Peterson Manufacturing Company Facility located at 1600 63rd Street in Emeryville, California (Site) in support of further characterizing the Site.

INTRODUCTION

Based on the results of previous shallow groundwater investigation (SOMA, 2000), further investigation to assess the downgradient extent of petroleum hydrocarbons off-site was recommended. In a letter dated 28 September 2006 (attached), the ACEH also requested activities for additional site characterization. Additional monitoring wells are proposed to further characterize the lateral extent of the plume, along with rehabilitation and/or redevelopment of existing monitoring wells, as appropriate, to improve groundwater data quality. In order to characterize the behavior and extent of free product in the shallow groundwater, a small-scale pilot test is recommended to allow proper selection of an appropriate interim remedial action.

The objectives of this Work Plan are to further characterize the lateral extent of petroleum hydrocarbons both on the Site and off-site in the downgradient direction, to assess the extent and volume of free product in shallow groundwater, and to assess potential for preferential pathways for shallow groundwater flow on the Site.

Treadwell&Rollo

SCOPE OF WORK

The field investigation activities will include:

- **Task 1**. Collect soil and grab groundwater samples at three off-site borings (SB-1, SB-2, and SB-3) downgradient of the Site to assess the lateral extent of petroleum hydrocarbons in soil and shallow groundwater.

- **Task 2.** Redevelop five existing monitoring wells on site for further characterization of the site and in preparation for future quarterly groundwater monitoring.

- **Task 3.** Install five additional monitoring wells and collect groundwater samples from these wells to expand the monitoring well network and further characterize the Site: three new wells are recommended to supplement existing wells, and two new wells are recommended to confirm and monitor the extent of petroleum hydrocarbons at the downgradient (northwest) side of the Site.

- **Task 4.** Conduct a pilot test of free product recovery rate by hand-bailing of free product at well MW-2 and other well locations (depending on the presence of free product observed), which will assist in the selection of an appropriate interim remediation action.

- **Task 5.** Investigate potential preferential pathways for horizontal and vertical contaminant migration, including underground utilities and all nearby wells.

Task 1. Off-Site Soil and Grab Groundwater Sampling

Prior to drilling, water-level measurements will be taken at the existing monitoring wells. This data will be used to evaluate the general groundwater direction on the Site and confirm the previous findings. If the current groundwater flow direction is different from the northwest direction found in 1999, the proposed boring locations will be moved to characterize the downgradient extent of the plume. After final drilling locations are determined, a subsurface drilling permit will be obtained from Alameda County Public Works Agency. It will also be necessary to obtain an encroachment permit from the City of Emeryville for any work in the city right of way. Underground Services Alert (USA) will be notified in advance and the drilling locations will be cleared for underground utilities using a private underground utility locating subcontractor. ACEH will be notified at least 72 hours prior to commencement of drilling activities.

Soil samples will be collected at three boring locations (Figure 1). In addition to gradient considerations, the sampling locations in Figure 1 are contingent upon access limitations (e.g. site features, utilities) and final locations may be moved to the closest accessible location. The samples will be collected from borings advanced by direct push technology. The soil will be monitored for visible staining and odor detected by field personnel, and will be screened using a photo-ionizing detector (PID). Samples will be collected from intervals showing visible staining, odor, or elevated PID readings, or when a change in lithology is observed. If no staining, odor, or elevated PID readings are observed, samples will be taken in five-foot intervals from the capillary fringe just above the groundwater table to the completion depth. The soil samples will be collected in stainless steel tubes and submitted to a California state-certified laboratory for the following analyses:

- Total petroleum hydrocarbons as gasoline (TPHg) and as diesel (TPHd) by EPA Method 8015M
- Benzene, toluene, ethylbenzene and xylene (BTEX), ethylene dibromide (EDB), ethylene dichloride (EDC), methyl tertiary-butyl ether (MTBE), tertiary amyl methyl ether (TAME), ethyl tertiary butyl ether (ETBE), di-isopropyl ether (DIPE), tertiary butyl alcohol (TBA) and ethanol (EtOH) by EPA Method 8260
- Total lead.

Samples will be labeled, placed in an ice-chilled cooler, and delivered to the analytical laboratory under chain-of-custody protocol.

Grab groundwater samples will be collected from the same borings as the soil samples. Borings will be advanced to approximately 5-10 feet below the groundwater surface. Grab groundwater samples will be collected from the borings using a Teflon or stainless steel bailer lowered into temporary well casing installed in the borehole. The temporary PVC well casing will be screened across the groundwater surface to allow product, if present, to enter the casing. The grab groundwater samples will be collected into appropriate containers and submitted to a California state-certified laboratory for the following analyses:

- Total petroleum hydrocarbons as gasoline (TPHg) and as diesel (TPHd) by EPA Method 8015M
- Benzene, toluene, ethylbenzene and xylene (BTEX), ethylene dibromide (EDB), ethylene dichloride (EDC), methyl tertiary-butyl ether (MTBE), tertiary amyl methyl ether (TAME), ethyl tertiary butyl ether (ETBE), di-isopropyl ether (DIPE), tertiary butyl alcohol (TBA) and ethanol (EtOH) by EPA Method 8260.

Treadwell&Rollo

Samples will be labeled, placed in an ice-chilled cooler, and delivered to the analytical laboratory under chain-of-custody protocol.

All drilling and sampling equipment will be decontaminated prior to each use. The soil cuttings and decontamination rinsate will be contained in either 5-gallon pails or 55-gallon drums on site and disposed off-site, after soil analytical results are received. The borings will be backfilled with neat cement bentonite slurry, and the ground surface restored using appropriate replacement materials (i.e. concrete, asphalt patch).

Task 2. Redevelopment of Existing Wells

The monitoring wells on the Site have not been sampled since 1999, and will be redeveloped prior to sampling. The wells will be redeveloped by pumping, bailing and/or surging the well to remove sediment from around the screened interval and to enhance the hydraulic connection with the surrounding formation. Three new wells are proposed to be installed to supplement or replace existing wells MW-1, MW-3, and MW-4 because these existing wells have screen intervals below the top of the current shallow groundwater table (see Task 3 below). After the development of the new wells, the utility of MW-1, MW-3, and MW-4 will be evaluated, and if they are determined to not provide additional information, will be destroyed according to State of California guidelines.

Task 3. Installation of New Monitoring Wells

New groundwater monitoring wells will be installed to confirm the grab groundwater sampling results and in preparation of re-initiating quarterly groundwater monitoring of shallow groundwater at the Site. The proposed monitoring well locations in Figure 1 are contingent upon access limitations (e.g. site features, utilities) and final locations may be moved to the closest accessible location. Based on previous data collected at the Site, we anticipate that the depth to groundwater will be approximately 6 feet below grade, and we anticipate that the total depth of the shallow wells will be approximately 15-20 feet below grade. However, because water-level data has not been collected since 1999, and the seasonal variation of the depth to groundwater is not known, the total depth and screened interval of the wells will be determined using the site conditions found during subsurface drilling. The well screen depth will be designed to accommodate potential fluctuations in the shallow groundwater table and will be screened across the current shallow groundwater table to allow product, if present, to flow into the wells.

The well borings will be drilled using a licensed drilling contractor using direct-push or hollow-stem auger drilling equipment. Monitoring wells will be constructed using flush-threaded, 2-inch diameter polyvinyl chloride (PVC) casing with factory-slotted well screens placed at depth intervals extending across the groundwater table. Soil will be logged during drilling, and the

lithology will be described using USCS terminology. Well installation procedures will conform to guidelines established by the California Department of Water Resources. All down-hole drilling and sampling equipment will be cleaned prior to use at each drilling location to prevent potential cross-contamination between locations. Well permits will be obtained from Alameda County Public Works Agency prior to drilling at the site.

After completion of the well installation activities, the new monitoring wells will be developed by pumping, bailing and/or surging the well to remove sediment from around the screened interval and to enhance the hydraulic connection with the surrounding formation.

After the well installation is complete, the elevation of the top-of-casing for each well will be established by a licensed surveyor. Water-level measurements will be collected to evaluate current groundwater flow direction and gradients on Site. Depth to water will be measured using an electric water-level meter, and groundwater elevations will be calculated from these measurements. The soil cuttings and decontamination rinsate will be contained in 55-gallon drums on site and disposed off-site, after soil analytical results are received.

Task 4. Pilot Test of Free Product Removal

Previous monitoring well sampling (SOMA, 2000) found approximately 3 feet of free product in well MW-2. Because of the well construction design of the existing monitoring wells, the amount and extent of free product is poorly understood. To choose an appropriate interim remedial action, we propose to characterize the free phase petroleum contamination through bi-weekly hand bailing of free product from MW-2 for approximately 2 to 3 months. During each bi-weekly event, the thickness of free product in the well and the amount of product removed will be noted, and the collected product will be disposed according to hazardous material disposal guidelines. Product removal data will be used to evaluate the recovery rate, volume, and the extent of free product in the area of the well, at which point recommendations for an interim remediation approach will be made, if appropriate. Additional free product removal may be performed at other wells, depending upon the amount of free product observed.

Task 5. Preferential Pathway Study

To identify potential migration pathways, and determine the probability of free product or dissolved phase product encountering preferential pathways or conduits, we propose to investigate the possible horizontal and vertical migration pathways on and around the Site, and their relation to free and dissolved phase product.

The current tenant has operated a FedEx shipping facility at the Site since 1989, when the Site was redeveloped and construction of the FedEx building was completed. We will review the

facility's operational history with respect to UST installation and use. After our initial review of facility plans, we will conduct a field survey using subsurface utility locating equipment to verify known or suspected underground utilities, and to possibly locate unknown utilities. Based on the underground utility survey results, we will update our site maps to illustrate potential preferential pathways.

We will also conduct an administrative search of registered groundwater wells within a ½-mile radius of the site. For this well search, we will obtain a listing of registered groundwater wells and their locations from Environmental Data Resources (EDR) and other sources as appropriate. The registered wells within ½ mile of the site will be plotted on a map and included in the report outlined below. In addition to the search of registered wells, we will perform a background study of historical land uses of the Site and of properties immediately downgradient of the site, with particular attention to evidence for unrecorded/unknown wells. Sources of data for this review may include Sanborn maps and aerial photos. In accordance with ACEH's request, appropriate copies of aerial photos used in the study, and a list of aerial photographs available for the Site will be included in the report outlined below.

Task 6. Soil and Groundwater Investigation Report and Monitoring Well Installation Report

Geologic, hydrogeologic, and chemical data collected from the groundwater investigation, well installation, and pilot test activities will be evaluated and summarized in a written report. The report will include detailed descriptions of the methodologies used to collect and analyze the data, as well descriptions of the Site and site geology, and copies of the field documentation and laboratory data sheets. The analytical results for soil and groundwater sampling, as well as for monitoring well sampling will be tabulated and interpreted with respect to the lateral extent of the petroleum hydrocarbon plume. The results of the preferential pathway study will be presented, and the probability of free or dissolved phase product migrating through those conduits will be discussed. Evaluation of the pilot test product removal will be presented and recommendations for interim remediation, as necessary, will be assessed.

Analytical data from the report will be submitted to Geotracker as required and electronic copies of the report will be submitted to Geotracker and to the Alameda County Environmental Cleanup Oversight Program ftp site after completion.

SCHEDULE

Field work can begin within a month of authorization to proceed. The field work is estimated to take one week to complete. Laboratory results will be available two weeks after submittal, and the report will be submitted twelve weeks after completion of field activities.

If you have any questions, please call Glenn Leong at (510) 874-4500 at extension 554.

Sincerely yours,
TREADWELL & ROLLO, INC.

Glenn M. Leong, REA
Senior Associate

David R. Kleesattel, P.G.
Senior Geologist

PROFESSIONAL GEOLOGIST
DAVID R. KLEESATTEL
No. 5136
STATE OF CALIFORNIA

34940104.OAK

Attachments: Figure 1 – Proposed Additional Soil and Groundwater Sampling and Monitoring Well Locations
ACEH letter dated 28 September 2006

cc: Richard Robbins, Wareham Property Group

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) 337-9335

September 28, 2006

Mr. Richard Robbins
Wareham Property Group
11220 Nye Street, Suite 400
San Rafael, CA 94901

Subject: Fuel Leak Case No. RO0000052, Peterson Manufacturing Company, 1600 63rd Street, Emeryville, CA

Dear Mr. Robbins:

Alameda County Environmental Health Department (ACEH) staff have reviewed the case file and report entitled, "Groundwater Investigation Report and Work Plan for Additional Investigations", dated January 10, 2000 and prepared on your behalf by SOMA Corporation. Groundwater sampling conducted during May 1999 confirmed the presence of separate phase petroleum hydrocarbon in monitoring well MW-2 and downgradient in soil boring HP-5, at the property boundary. Dissolved phase total petroleum hydrocarbon as diesel (TPHd) was detected at concentrations up to 550,000 µg/L in the vicinity of the former UST and 5,800,000 µg/L at the western property boundary. In addition, total petroleum hydrocarbon as gasoline (TPHg) was tested at concentrations of 210,000 µg/L in the vicinity of MW-2 and 3,000 µg/L at the western perimeter.

Our review of the case file indicates that additional offsite characterization activities followed by onsite interim remediation are required. Off site characterization proposed in January 2000 by SOMA and subsequently approved by ACEH in October 2002 has not been implemented. Therefore, ACEH requests you provide a revised work plan that details your proposal to delineate soil and groundwater contamination downgradient of your site.

Based on the concentrations of TPHg and TPHd detected in the soil and water samples, an offsite investigation is required to assess the extent of soil and groundwater contamination downgradient of your site. We recommend that your investigation incorporate expedited site assessment techniques. Expedited site assessment tools and methods are a scientifically valid and cost-effective approach to fully define the three-dimensional extent of groundwater contamination. Technical protocol for expedited site assessments are provided in the U.S. Environmental Protection Agency's "Expedited Site Assessment tools for Underground Storage Tanks: A Guide for Regulators," (EPA 510-B-97-001), dated March 1997.

Based on ACEH staff review of the case file, we request that you address the following technical comments and prepare a work plan detailing work to be performed, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to steven.plunkett@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Site Characterization and Soil and Groundwater Investigation.** Results of previous investigative work performed at the site have been insufficient to adequately characterize the

extent of soil and groundwater contamination downgradient of your site. Based on the concentrations of TPH and TPH constituents detected in the soil and groundwater, additional investigation immediately downgradient of the site is required to assess the extent of soil and groundwater contamination.

ACEH recommend that your investigation incorporate expedited site assessment techniques to collect soil samples and depth-discrete groundwater samples prior to the installation of groundwater monitoring wells. Expedited site assessment tools and methods are a scientifically valid and cost-effective approach to fully define the three-dimensional extent of soil and groundwater contamination. Technical protocol for expedited site assessments are provided in the U.S. Environmental Protection Agency's "Expedited Site Assessment tools for Underground Storage Tanks: A Guide for Regulators," (EPA 510-B-97-001), dated March 1997. Therefore, we recommend that you utilize direct push technology to collect soil samples and depth-discrete groundwater samples. Sampling locations should be positioned to accurately assess the extent of soil and groundwater contamination. Other options for additional investigation may be appropriate to define contamination at your site. Please submit a detailed Work Plan presenting your proposal to fully characterize the lateral and vertical extent of soil and groundwater contamination. The Work Plan should be prepared by a qualified professional and must fully describe the proposed scope and methods for the soil and groundwater investigation.

2. **Contamination Plume Delineation.** The lateral extent of the dissolved petroleum hydrocarbon contamination has not been determined at the site. Results from the most recent groundwater monitoring conducted in May 1999 indicate that residual TPH and TPH constituents in groundwater beneath your site may be migrating off site. There has been no data collected downgradient of the site to determine the aerial extent of dissolved hydrocarbon contamination. ACEH believes the monitoring well network -in its current design- is insufficient to adequately define the extent of contamination downgradient of MW-2. To determine the extent of dissolved petroleum hydrocarbon contamination an additional soil and groundwater investigation is required downgradient of your site. Please discuss in detail your proposal to perform this work in the Work Plan requested below.

3. **Interim Remediation.** During May 1999, groundwater-sampling activities detected approximately 3 feet of floating free product in MW-2. SOMA suggests free product removal on a bi-weekly basis by hand bailing. ACEH concurs with the need for interim remedial measures in the vicinity of monitoring well MW-2 in order to mitigate free phase petroleum contamination. However, ACEH suggest a more aggressive approach to remediate free product contamination on site and mitigate offsite migration of dissolved phase petroleum hydrocarbons. Interim remediation will be required for this site due to the elevated concentrations of dissolved hydrocarbons migrating off site. Plans for interim remediation are to be proposed following site characterization as requested below.

4. **Soil Sampling.** All soils from the boreholes are to be examined for staining and odor and are to be screened using a photo-ionizing detector (PID). Soil samples are to be collected from any interval where staining, odor, changes in lithology or elevated PID readings are observed. If no staining, odor, or elevated PID readings are observed, soil sample are to be collected from each boring at the capillary fringe, immediately above the zone where groundwater is first encountered and at 5 ft interval to the total depth of the boring. Results

from the investigation are to be presented in the Soil and Groundwater Investigation Report requested below.

5. **Soil Sample Analysis.** All soil samples collected during the investigation are to be analyzed for TPHg and TPHd by EPA Method 8015M or 8260, BTEX, EDB, EDC, MtBE, TAME, ETBE, DIPE, TBA and EtOH by EPA Method 8260 and total lead. Please present the results from the soil and groundwater sampling in the Soil and Groundwater Investigation Report requested below.

6. **Monitoring Well Rehabilitation and Redevelopment.** Considering that there has been no program of groundwater monitoring at the site since 1999, ACEH requests that prior to groundwater sampling, all monitoring wells are to be rehabilitated and/or redeveloped; thus allowing the collection of a representative sample of formation groundwater. Note that well redevelopment may require additional well volumes to be removed to assure that water quality parameters are satisfied. Please describe and present the results of the well redevelopment and rehabilitation activities in Revised Work Plan for Soil and Groundwater Investigation requested below.

7. **Groundwater Monitoring.** Groundwater monitoring has not been performed since 1999. Please implement quarterly groundwater monitoring for the above referenced site according the schedule presented in the Technical Reports Requested below. ACEH requires that all on site monitoring wells be included in a groundwater-monitoring program. The groundwater samples are to be analyzed for TPHg and TPHd by EPA Method 8015M or 8260, BTEX, EDB, EDC, MtBE, TAME, ETBE, DIPE, TBA and EtOH by EPA Method 8260. Please present the results for sampling in the 4th Quarterly Monitoring Reports requested below.

8. **Preferential Pathway Study**

The purpose of the preferential pathway study is to locate potential migration pathways and conduits and determine the probability of the NAPL and/or plume encountering preferential pathways or conduits that could spread contamination. Of particular concern is the identification of abandoned wells and improperly destroyed wells that can act as vertical conduits to deeper water gearing zones, pumping wells in the vicinity of your site and manmade conduits for shallow migration.

We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for horizontal and vertical migration that may be present in the vicinity of the site. Discuss your analysis and interpretation of the results of the preferential pathway study (including the detailed well survey and utility survey requested below) and report your results in the Well Installation Report requested below. Include an evaluation of the probability of the dissolved phase and NAPL plumes for all constituents of concern encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper aquifers. The results of your study shall contain all information required by 23 CCR, Section 2654(b).

a) **Utility Survey**

An evaluation of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s) is required as part of

your study. Submittal of map(s) and cross-sections showing the location and depth of all utility lines and trenches within and near the site and plume area(s) is required as part of your study.

b) **Well Survey**

The preferential pathway study shall include a detailed well survey of all wells (monitoring and production wells: active, inactive, standby decommissioned (sealed with concrete), abandoned, (improperly decommissioned or lost); and dewatering and cathodic protection wells) within a ½ mile radius of the subject site. The well survey should include well data from California Department of Water Resource well database and Alameda County Department of Public Works. As part of your detailed well survey, please perform a background study of the historical land uses of the site and properties in the vicinity of the site. Use the results of your background study to determine the existence or unrecorded/unknown (abandoned) wells, which can act as pathways for migration of contamination at and/or from your site. Please review historical maps such as Sanborn maps, aerial photos, etc., when performing the background study. Submittal of map(s) showing the location of all wells identified in your study, and the use of tables to report the data collected as part of your survey are required. Include appropriate photographic prints, in stereo pairs, of historic aerial photos used as part of the study. We also request that you list by date all aerial photographs available for the site from the aerial survey company of library you use during your study. Please refer to the Regional Board's guidance for identification, location, and evaluation of potential deep well conduits when conducting your preferential pathway study. Present the result from the preferential pathway study in the report requested below.

9. **Geotracker EDF Submittals** - A review of the case file and the State Water Resources Control Board's (SWRCB) Geotracker website indicate that electronic copies of analytical data have not been submitted for your site. Pursuant to CCR 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 LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, beginning January 1, 2002, all permanent monitoring points utilized to collected groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload all analytical data (collected on or after September 1, 2001), to the SWRCB's Geotracker database website in accordance with the above-cited regulation. Please perform the electronic submittals for applicable data and submit verification to this Agency by October 30, 2006.

TECHNICAL REPORT REQUEST

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

- **October 30, 2006** – Revised Work Plan for Soil and Groundwater Investigation and Monitoring Well Rehabilitation Report.
- **November 30, 2006** – 4th Quarter 2006 Groundwater Monitoring Report
- **February 30, 2007** – 1st Quarter 2007 Groundwater Monitoring Report
- **May 30, 2007** – 2nd Quarter 2007 Groundwater Monitoring Report
- **August 30, 2007** – 3rd Quarter 2007 Groundwater Monitoring Report
- **November 30, 2007** – 4th Quarter 2006 Groundwater Monitoring Report
- **120 Days After Completion of Work Plan** – Soil and Groundwater Investigation, Preferential Pathway Study and Interim Remediation Work Plan

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

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was 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 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.

Should you have any questions, do not hesitate to call me at (510) 383-1767.

Sincerely,

Steven Plunkett
Hazardous Materials Specialist

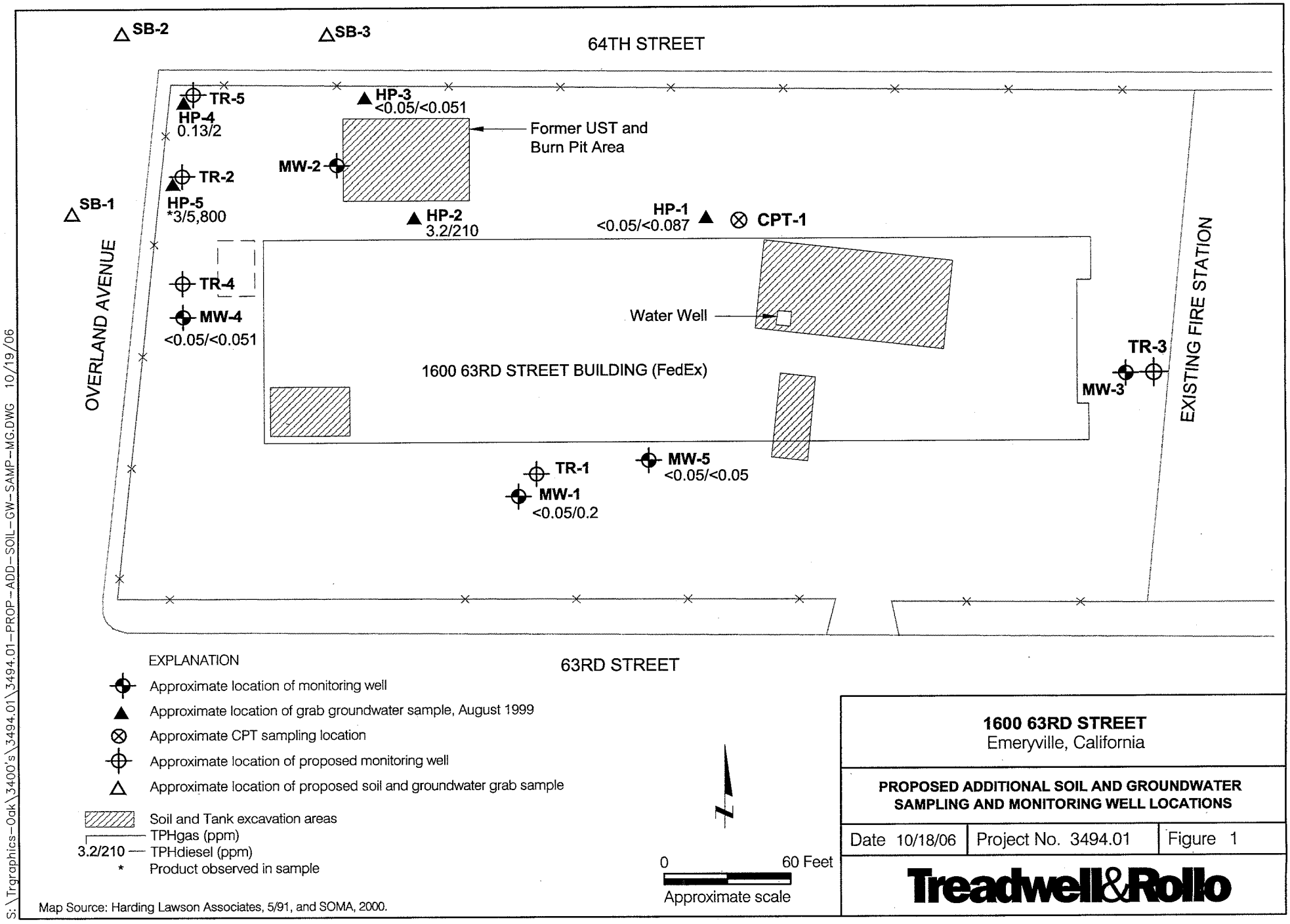
Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Norman Ozaki
Soma Corporation
1412 62nd Street
Emeryville, CA 94608

Donna Drogos, ACEH
Steven Plunkett, ACEH
File

Treadwell&Rollo

FIGURE



Map Source: Harding Lawson Associates, 5/91, and SOMA, 2000.

1600 63RD STREET
Emeryville, California

PROPOSED ADDITIONAL SOIL AND GROUNDWATER SAMPLING AND MONITORING WELL LOCATIONS

Date 10/18/06	Project No. 3494.01	Figure 1

Treadwell&Rollo

S:\Trgraphics-Oak\3400's\3494.01\3494.01-PROP-ADD-SOIL-GW-SAMP-MG.DWG 10/19/06