



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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November 20, 2009

Clifford, Anita, and Balin Welsh
Clyde's Electronics
15796 E 14th Street
San Leandro, CA 94578

Subject: Work Plan Approval with Modifications, Clyde's Corner, Fuel Leak Case No. RO0000168
and Geotracker, Global ID # T06019778014, 15796 14th Street, San Leandro, CA 94578

Dear Mr. Welsh:

I have recently joined Alameda County Environmental Health Department (ACEH) and have been assigned to this case. Please submit future correspondence to my attention. Thank you for submitting the *Work Plan for Subsurface Site Characterization*, submitted on your behalf by Environmental Risk Specialties Corporation (ERS), dated August 18, 2009, and received September 8, 2009. ACEH staff has reviewed the document, the case file, and generally concurs with the approach outlined in the work plan, provided that the technical comments below are incorporated during the proposed field investigation. Submittal of a revised work plan or work plan addendum is not required unless an alternate scope of work outside that described in the Work Plan or the technical comments is proposed. If alternative bore locations are proposed than as previously described, please forward a diagram of the preferred alternate locations. Please provide advance written notification to this office by e-mail (mark.detterman@acgov.org) 72 hours prior to the start of field activities.

TECHNICAL COMMENTS

- 1. Installation of Seven Soil Bores** - The referenced work plan indicates that seven direct push (Geoprobe) soil bores will be installed around the three former gasoline underground storage tanks (USTs) at locations specified in the work plan. While the number of bores appears to be adequate to initiate characterization in the vicinity of the former tank field, ACEH requests that additional or relocated bores be installed through the former UST and Pump Island locations. It is understood that project financing is currently limited; however, it is also appropriate to further investigate the tank-hold backfill, reported as unremediated UST removal spoils that were reintroduced into the UST basins after completion of UST removal. The tank basins were also reported to contain (ground)water with a sheen noted. The tank removal spoils were characterized at the time by two four-point composite samples containing up to 250 milligrams per kilogram (mg/kg) Total Petroleum Hydrocarbons (TPH) as gasoline and other gasoline-related constituents.
- 2. Proposed Soil Sample Matrix** - Table 2 of the referenced Work Plan presents an outline of proposed soil sampling intervals, and associated collection of groundwater from two of the soil bores. ACEH notes that, except in bore B1, shallow soil samples were not proposed. This may have been an oversight; however, ACEH requires that, rather than using a static sample matrix that can limit sample collection, soil samples be collected and submitted for laboratory analysis in all soil bores at any interval where staining, odor, or elevated PID readings occur, and at sufficient depth below the deepest indication in order to define the vertical extent in soil. If no staining, odor, or elevated PID readings are observed, a soil sample is to be collected from each boring at the capillary fringe, where groundwater is first encountered, changes in lithology, and at five foot intervals until total depth of the boring is reached. Two grab groundwater samples are proposed in the matrix, and are required by

ACEH to be collected at the capillary fringe as determined by the soil boring data. ACEH additionally requests the collection of a grab groundwater samples from each UST and Pump Island bore in order to help further define potential impact to groundwater beneath the site (three additional grab groundwater samples).

3. **Proposed Location for Bore B7** – The proposed location for soil bore B7 appears to be appropriately placed; however, the alternate location may be in a potentially lateral gradient position to groundwater flow. ACEH notes a currently channelized stream approximately 185 feet due west of the site, while pre-development topography dropped to the southwest. If required, the preferred alternate location for B7 is in East 14th Street adjacent to the proposed tree well location.

TECHNICAL REPORT REQUEST

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

- **February 15, 2010** – Soil and Groundwater Investigation Report

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 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: David Dement, Environmental Risk Specialties Corp, 1600 Rivera Avenue, Suite 310, Walnut Creek, CA 94596, (sent via electronic mail to ddement@erscorp.us)
Donna Drogos, (sent via electronic mail to donna.drogos@acgov.org)
Mark Detterman (sent via electronic mail to mark.detterman@acgov.org),
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.