

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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November 20, 2008

Mr. Jason Warner
Oro Loma Sanitary District
2600 Grant Avenue
San Lorenzo, CA 94580

Subject: Fuel Leak Case No. RO0000288 (Geotracker Global ID# T0600101928), Oro Loma Sanitary District, 2600 Grant Avenue, San Lorenzo, CA

Dear Mr. Warner:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including the report entitled, "Well Closure and Soil Boring Installation Report" received May 8, 2008 and prepared by the Sutton Group (Sutton). Results from the soil boring installation indicate that petroleum hydrocarbon contamination was detected in soil boring SB-10 at concentrations up to 2,700 mg/kg, 260 mg/kg TPHd and 12 mg/kg benzene. The location of soil boring SB-10, in the source area, indicates that the high concentrations of residual contamination remain in the former tank pit. A source area soil excavation was completed in June 2008 and a report documenting the results of the remedial action is pending.

We request that you perform the proposed work, 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. **Decommission Monitoring Well MW-4 and Install Replacement Well MW-6.** Sutton has decommissioned monitoring well MW-4 and will replace it with well MW-6, once the interim remediation soil removal and site restoration activities have been completed. In addition, in June 2008 Sutton completed a source area soil removal and the installation of groundwater extraction trench around the source area to control offsite migration of the dissolved phase hydrocarbon plume. Results from the remedial actions will be presented in an interim remedial action report. Please submit the interim remedial action report according to the schedule outlined below.
2. **Geotracker EDF Submittals.** During our customary review of the State Water Resources Control Board Geotracker website, ACEH found that the "Interim Corrective Action Plan" and "Report of Well Closure and Soil Boring Installation" have not been submitted to the Geotracker database. Please perform the electronic submittal for the appropriate document and submit verification to this Agency by November 21, 2008.

TECHNICAL REPORT REQUEST

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

- **December 21, 2008** – Confirmation of Geotracker Submission
- **January 21, 2009** – Interim Remedial Action 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

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](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

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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

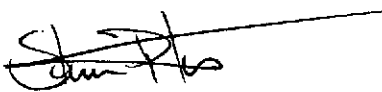
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

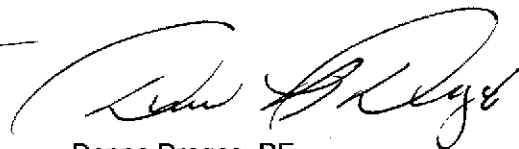
AGENCY OVERSIGHT

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.

If you have any questions, please call me at (510) 383-1767.

Sincerely,


Steven Plunkett
Hazardous Materials Specialist


Donna Drogos, PE
Supervising Hazardous Materials Specialist

cc: John Sutton
The Sutton Group
3708 Mount Diablo Blvd., Suite 215
Lafayette, CA 94549

Donna Drogos, ACEH, Steven Plunkett, ACEH, File