



August 25, 2010

ENVIRONMENTAL HEALTH DEPARTMENT
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

Mr. Jason Warner
Oro Loma Sanitary District
2600 Grant Avenue
San Lorenzo, CA 94580
(sent via electronic mail to jwarner@oroloma.org)

Subject: Request for Information; 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, *Report of Interim Corrective Action at Former UST Site*, dated January 12, 2009, and received February 9, 2009. The report was submitted on your behalf by The Sutton Group (Sutton). In general the report documented the overexcavation of the former UST location, the permitted decommissioning of well MW-4, the permitted installation well MW-6, the installation of a recovery well and two observation wells within the area of excavation, and the disposal of approximately 543 tons of soil at the Altamont Landfill, and approximately 31.6 tons of soil at Kettleman Hills.

Based on the review of the case file and the referenced report ACEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

1. **Request for Additional Information** – Several questions were developed upon reviewing the report and require clarification. They include:
 - a. **Overexcavation Confirmation Sample Locations & Concentrations** – The analytical results for confirmation sampling collected at the base of the overexcavation were included in an appendix; however, the locations were not depicted to allow an understanding of residual contamination, nor were the results tabulated. It is understood that sidewall samples were not collected to document the extent of residual contamination observed by case worker Paresh Khatri during his visit. If this is incorrect please inform ACEH of the results. Otherwise, please submit a figure that depicts all confirmation locations and tables of the analytical data as an addendum to the report by the date identified below.
 - b. **Status Reports** – The referenced report indicates that status reports would be prepared and electronically submitted on a quarterly basis. The referenced report is the most recent communication received at either the ACEH ftp or the state Geotracker websites. Presuming these have been generated, please submit all status reports. If these have not been generated, please initiate reporting. If appropriate please also evaluate the reporting interval as the interval may require adjustment based on data presumed to have been collected since January 2009.

2. **Groundwater Monitoring** - The site is out of compliance with the July 24, 2009, ACEH letter requesting the implementation of semiannual groundwater monitoring. Groundwater monitoring reports have not been submitted since the November 9, 2008 report. Please place the site on a semiannual monitoring basis. A reduction in the number of wells and the sampling interval may be appropriate after a minimum of two events.
3. **Geotracker Well Survey** – As mapped on Geotracker the location of well MW-6 is over 500 feet from its depicted location on report figures. Geotracker also indicates an unknown well (MW-D1) is associated with the site, again over 500 feet from the area of the site investigation. Please communicate if the later well is associated with the case and its purpose. Please correct the location data for well MW-6 (and MW-D1, if associated with the site).
4. **Diesel ASTs and Associated Well MW-1** – Review of the case file indicates that two 2,500-gallon diesel aboveground storage tanks (ASTs) were removed and several overexcavations occurred in the mid 1990's. The most recent correspondence found related to these ASTs was a September 26, 1996 letter from Sutton relative to the locations of two bores installed to help define the lateral limits of diesel impacted media. In question at this time is the status of well MW-1 installed to help understand the extent of diesel impacts to groundwater in the vicinity of the former ASTs. The well appears to have been last sampled in January 1996. Please communicate the status of this well.

TECHNICAL REPORT REQUEST

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

- **September 24, 2010** – ICAP Report Addendum and submittal of existing Status Reports
- **November 19, 2010** – Submittal of Third Quarter 2010 Status Report, including groundwater monitoring
- **February 18, 2011** - Submittal of Fourth Quarter 2010 Status 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.

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

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

cc: John Sutton, The Sutton Group, 3708 Mount Diablo Blvd, Suite 215, Lafayette, CA 94549
(sent via electronic mail to suttongeo@sbcglobal.net)
Donna Drogos, ACEH, (sent via electronic mail to donna.drogos@acgov.org)
Mark Detterman, ACEH, (sent via electronic mail to mark.detterman@acgov.org)
Geotracker, e-File

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

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
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

- **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 dehloptoxic@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) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - 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.