



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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December 15, 2011

David D. and Wendy Lin
5 Pine Tree Lane
Orinda, CA 94563

Henrietta Larson
c/o Mark Cederborg Esq.
1300 Clay St., Suite 500
Oakland, CA 94612

Jim Hardgrave
General Transportation
Address Unknown

Subject: Conditional Approval of Site Assessment Work Plan; Fuel Leak Case No. RO0000338 and Geotracker Global ID T0600100635, General Transportation, 3211 Wood Street, Oakland, CA 94608

Dear Mr. and Mrs. Lin, Ms. Larson, and Mr. Hardgrave:

Thank you for submitting the "Site Assessment Work Plan" dated October 19, 2011 prepared by Antea Group. Alameda County Environmental Health (ACEH) generally concurs with the proposed scope of work. The proposed scope of work may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed.

Please schedule and complete the field work activities by the date specified below, and provide this office at least three (3) business days notice prior to commencement of the field activities.

TECHNICAL COMMENTS

1. Alameda County concurs with the silica gel clean up for the diesel range hydrocarbon analysis. ACEH recommends silica gel clean up be used for any analysis that would benefit from distinguishing naturally occurring organics from anthropomorphic chemicals of concern. When presenting the laboratory analysis report, please include the carbon range for the gasoline and diesel range petroleum hydrocarbons and the recoverable range organic (RRO) compounds.
2. In the second paragraph on page 5 of the Work Plan which describes an additional scope of analysis in the vicinity of the waste oil and solvent tanks, it states "*In addition, Antea Group recommends the additional analytes.*". To clarify, ACEH requests that these analyses be performed.
3. The contents of Tank 4, as referenced in the 1992 UST removal report prepared by Eisenberg, Olivieri, and Associates (EOA), was profiled and identified as a non-chlorinated solvent similar to paint thinner. To clarify, the analytes reported by EPA Method 8260 should also include non-chlorinated solvents.

4. Please include the lead scavenger ethylene dichloride (EDC) in the EPA Method 8260 list of analytes. As this is not an active fueling facility, the analysis for ethanol need not be performed.
5. Should the laboratory analysis report document the presence of extractable range petroleum hydrocarbons for the solvent tank soil sample at the SB-7 location, please perform a fuel fingerprint using EPA test method 8015 to differentiate Stoddard solvent, diesel, and motor oil range hydrocarbons.
6. The 1992 EOA report states previous site activities included vehicle repair and disassembly. Based on this history, analysis for motor oil range petroleum hydrocarbon and the LUFT metals are required for the near surface soil samples recovered from each of the borings.
7. If elevated lead concentrations are detected in the SB-5 and/or SB-6 soil samples, please analyze for organic lead on the sample reported to contain the highest lead concentration.
8. The topographic elevation at the site and its proximity of San Francisco Bay suggests groundwater beneath the site may be encountered within 10 feet of the ground surface. The anticipated boring depth of 25 to 30 feet is likely too deep to provide a representative LNAPL-impacted groundwater sample due to dilution of the recovered sample. Advancing the boring to seven feet beyond first encountered water is anticipated to be adequate to provide a water sample for analysis. The depth required for adequate water should be verified in the first boring. After the collection of the water sample the boring can then be advance to the proposed depth.
9. The 1992 EOA report documented the presence of dissolved concentrations of lead, nickel and zinc. Please perform analysis for LUFT metals for all grab GW samples. Please document whether filtering was performed in the field or in the laboratory. Acidification of the sample is not recommended prior to filtering.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Keith Nowell)

- **February 29, 2012-** Soil and Groundwater Investigation Report

ACEH is reviewing the fuel case file for the above referenced site. Site investigation and groundwater monitoring from underground storage tank leaks are being performed at the subject property to which you are named as the primary or active responsible party. Pursuant to Section 25297.15 (a), ACEH, the local agency, shall not consider cleanup or site closure proposals from the primary or active responsible party, issue a closure letter, or make a determination that no further action is required with respect to a site upon which there was an unauthorized release of hazardous substances from an underground storage tank subject to this chapter unless all current record owners of fee title to the site of the proposed action have been notified of the proposed action by the primary or active responsible party. ACEH is required to notify the primary or active responsible party of their requirement to certify in writing to the local agency that the notification requirement in the above-mentioned regulation has been satisfied and to provide the local agency with a complete mailing list of all record fee title owners. To satisfy the above-

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mentioned requirement, please complete the enclosed "List of Landowners Form," and mail it back to ACEH within thirty (30) days from the date of this letter. Also your comments must be considered prior to the proposed cleanup or closure. Please respond within 30 days from the date of this letter for your comments to be considered.

As your email address does not appear on the cover page of this notification, ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Thank you for your cooperation. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Sincerely,

Keith Nowell, PG, CHG
Hazardous Materials Specialist

Enclosure: Responsible Party(ies) Legal Requirements/Obligations
ACEH Electronic Report Upload (ftp) Instructions
List of Landowners Form

cc: Nadine Periat, Antea Group, 312 Piercy Road, San Jose, CA, 95138 (Sent via E-mail to: Nadine.periat@anteagroup.com)

Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (Sent via E-mail to: lgriffin@oaklandnet.com)
Jonathan Lin (Sent via Email to: Jonathan.limex@gmail.com)
Donna Drogos, ACEH (Sent via E-mail to: donna.drogos@acgov.org)
Keith Nowell, ACEH (Sent via E-mail to keith.nowell@acgov.org)
GeoTracker
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.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

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 deh.loptoxic@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 deh.loptoxic@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.

LIST OF LANDOWNERS FORM

County of Alameda
Environmental Health Services
Environmental Protection
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR:

Site Name: General Transportation
Address: 3211 Wood Street
City, State, Zip: Oakland, CA 94608
Record ID #: RO0000338

Please fill out item 1 if there are multiple site landowners (attach an extra sheet if necessary). If you are the sole site landowner, skip item 1 and fill out item 2.

1. In accordance with Section 25297.15(a) of Chapter 6.7 of the California Health & Safety Code, I, _____ (name of primary responsible party), certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site:

Name: _____
Address: _____
City, State, Zip: _____
E-mail Address: _____

Name: P
Address: _____
City, State, Zip: _____
E-mail Address: _____

2. In accordance with Section 25297.15(a) of Chapter 6.7 of the California Health & Safety Code, I _____, certify that I am the sole landowner for the above site.

Sincerely,

Signature of Primary Responsible Party

Printed Name

Date

E-mail Address