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ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6700  
Fax (510) 337-9335

August 11, 2005

Ms. Cheryl Allen  
SBC Communications Inc.  
308 S Akard St Three SBC Plaza  
Environmental Management Room No: 900  
Dallas, TX 75202-5399

**Subject: Fuel Leak Case No. RO0002610, SBC, 2610 Norridge Ave., Castro Valley, CA 94546**

Dear Ms. Allen:

Alameda County Environmental Health (ACEH) staff has recently reviewed the Workplan and the Amendment to workplan" report, dated July 29, 2005, prepared by Hydrologue, Inc. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

#### TECHNICAL COMMENTS

As you are aware, the above work plan and its amendment was prepared in order to further define the horizontal and vertical extent of soil/groundwater contamination. Based on my discussion with Mr. Christopher P. d'Sa of Hydrologue, Inc. This office concurs with the submitted workplan and its amendment dated July 29, 2005. Please ensure the following items are addressed as specified below:

- 1- Site Conceptual Model (SCM) along with geological cross sections and other components of a SCM must be prepared as discussed.
- 2- **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).
- 3- 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 10/11/05.

## **TECHNICAL REPORT REQUEST**

Please submit the following technical reports to Alameda County Department of Environmental Health (Attention: Amir K. Gholami):

**October 11, 2005** Result of the 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**

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy 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 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, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic%20reporting)).

## **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.

If you have any questions, please call me at (510) 567-6876.

Sincerely,



Amir K. Gholami, REHS  
Hazardous Materials Specialist

cc: Mr. Christopher P. d'Sa, Hydrologue, Inc. 2793 East Foothill Blvd., Pasadena, CA 91107  
A.gholami, D.Drogos

Enclosure: ACEH Electronic Report Upload (ftp) Instructions



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July 19, 2005

Ms. Cheryl Allen  
SBC Communications Inc.  
308 S Akard St Three SBC Plaza  
Environmental Management Room No: 900  
Dallas, TX 75202-5399

**Re: Fuel Leak Investigation, Site No. RO0002610, SBC, 2610 Norridge Ave.,  
Castro Valley, CA 94546**

Dear Ms. Allen:

Alameda County Environmental Health, Local Oversight Program (LOP), has received and reviewed the March 23, 2005, and July 19, 2005 documents regarding the above referenced site as prepared by Ms. Seyed Morteza Mortazavi of Hydrologue Inc., Consulting Engineers & Geologists. The above workplan has also been discussed with Mr. Christopher P. d'Sa of Hydrologue Inc. as well.

This office requests that you address the following technical comments, perform the proposed work, and send us the technical reports requested below:

#### **TECHNICAL COMMENTS**

The above work plan was prepared in response to unauthorized release detection during an underground tank removal on 12/11/2003. This investigation is necessary in order to further define the horizontal and vertical extent of soil/groundwater contamination. Based on my discussion with Mr. Christopher P. d'Sa of Hydrologue, Inc. This office concurs with the submitted workplan and its amendment dated July 19, 2005 as specified below. Please ensure the following items are addressed as specified below:

- 1- Even though not much pollution was detected with the previous samples, there is a concern with fractured rock and the possibility of contamination to have traveled below the "bedrock". According to the report, MW-1 well was installed in the tank pit itself, and that the native soil was not encountered and therefore no soil sample was ever taken in the area of MW-1. Additionally, with the exception of SB-1, which is drilled up to 30 feet, the remaining borings have stopped at 15 feet. You need to determine the existing bedrock is not fractured causing plume transfer to deeper depth. Continuous groundwater and soil samples must be taken and should be performed at every five feet, at change in lithology and groundwater and extend well below groundwater up to about couple of feet into the "bedrock" to ensure you have actually encountered a bedrock as opposed to a boulder per our discussion.

- 2- Site Conceptual Model (SCM) along with geological cross sections and other components of a SCM must be prepared as discussed.

## TECHNICAL REPORT REQUEST

Please submit the following technical reports to Alameda County Department of Environmental Health (Attention: Amir K. Gholami):

**September 19, 2005**      Result of the Work Plan

If you have any questions, please do not hesitate to call me at (510) 567-6876

Sincerely,



Amir K. Gholami  
Hazardous Materials Specialist

C: Mr. Christopher P. d'Sa of Hydrologue, Inc., 2793 East Foothill Blvd., Pasadena,  
CA 911107  
A.gholami, D.Drogos