

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SOUT  
8-25-06

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-8577  
(510) 567-6700  
FAX (510) 337-9335

August 22, 2006

Gabriel Chui  
C/o Bruce Burrows  
Main Street Properties  
985 Moraga Road  
Lafayette, CA 94549

Subject: Spills, Leaks, Investigations and Cleanup (SLIC) case file #RO0002863, Crow Canyon Cleaners, 7272 San Ramon Road, Dublin, CA

Dear Mr. Chui:

Alameda County Environmental Health (ACEH) staff has reviewed the SLIC case file for the above-referenced site and the document entitled, "Site Investigation Report", dated April 2006 and prepared on your behalf by AEI Consultants. The stated purpose of the document is to evaluate whether halogenated volatile organic compounds (HVOCs) are present in soil, soil vapor and groundwater at the site. Laboratory analytical results indicate that elevated concentrations of HVOCs are present in soil, soil vapor and groundwater on site. HVOCs were detected in each of the three soil gas samples collected at concentrations up to 16,000 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ). Of particular concern is the high concentration of tetrachloroethene (PCE) detected in a soil gas sample from sample location SB-V-4, which is in close proximity to a school.

Considering that a school is located adjacent to the site, and a sensitive receptor survey has not been completed, ACEH does not agree with the conclusion that concentrations of HVOCs detected in soil gas at the site do not pose a risk to human health due to indoor air vapor intrusion pathway. Consequently, ACEH request that further soil gas investigation be completed to define the potential for exposure via vapor intrusion at the adjacent school and along the subsurface utilities corridor located inside the building and beneath the sidewalk in back of the building.

According to a statement in the site investigation report, "Based on analytical data, It is likely that the buried utilities within the vicinity of the site provide preferential pathways for migration of contamination". Therefore, ACEH require further site investigation -including sanitary sewers, storm drains, trench backfill, pipelines etc- be performed to better define the extent of contamination in soil and groundwater both onsite and offsite.

Based on ACEH staff review of the documents referenced above, we request that you address the following technical comments 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](mailto:steven.plunkett@acgov.org)) prior to the start of field activities.

### TECHNICAL COMMENTS

- 1. Human Health Risks Due to Vapor Intrusion.** Human health risks due to potential indoor vapor intrusion have not been fully evaluated for the site. Considering that soil gas sampling was limited to three locations, all of which had elevated concentration of PCE. Of particular concern is the school, which is in close proximity to the subject site. The location of this soil gas sample and the high concentrations of 16,000  $\mu\text{g}/\text{m}^3$  PCE in soil gas at sample location SB-4-V indicate that further investigation appears necessary. As discussed in the report, these concentrations are well above the PCE risk-based ESLs for residential use (San Francisco Regional Water Quality Control Board February 2005). The other volatile compounds analyzed, including benzene, toluene, ethylbenzene, and xylenes, were not detected above laboratory detection limits in the soil gas samples. Based on these results, we request that you evaluate whether residual soil gas concentrations pose a risk to children in the adjacent school via the indoor air inhalation pathway. Please explain your line of reasoning that the site has been adequately characterized when limited soil vapor analytical data has been collected. Present the results of your evaluation and any proposed additional work in the Work Plan requested below.
- 2. Sensitive Receptors and Environmental Screening Levels (ESL).** Identify any sensitive receptors such as schools, day care centers, or medical care facilities within 1000 feet of the site. Furthermore, the ESLs used for comparison during this investigation are for commercial/industrial zones. ACEH considers these ESL to be inappropriate, considering the proximity of a school to the site. We request that residential ESLs be applied to this site for all future evaluations due to the neighboring school. Please re-evaluate the analytical results to reflect residential ESLs, and identify any sensitive receptors in the report requested below.
- 3. Halogenated Volatile Organic Compounds in Shallow Soil, Groundwater, and Vapor.** PCE and TCE have previously been detected at elevated concentrations in soil and groundwater at several sampling locations at the site. If HVOCs are detected in soil or groundwater samples collected from the proposed soil and groundwater sampling locations at concentrations that exceed applicable screening levels for potential indoor vapor intrusion, additional soil vapor sampling will be required. In addition, grab groundwater samples collected during earlier investigations tested above the ESLs at four sample locations; SB-1-W, SB-2-W, SB-3-W and SB-10-W-1 all of which were inside the building. Please present plans (including soil gas sampling) in the Work Plan requested below to evaluate the potential for groundwater contamination both on site and off site.
- 4. Potential for Indoor Vapor Intrusion.** The concentrations of PCE in soil gas at sample location SB-4-V exceed the ESLs for vapor intrusion under a residential use scenario. Elevated concentrations of PCE were detected in soil vapor at boring SB-4, which is the boring furthest to the southwest at the site. A soil vapor survey will be useful in focusing subsequent soil and groundwater sampling on areas of likely or potential solvent discharges. The extent of HVOCs in soil and groundwater in the southwestern portion of the building is not known. The sanitary sewer line, which is shown on Figure 6 within the building, may be a potential source of HVOCs in addition to the former dry cleaning machine. Please propose a scope of work to define the extent of HVOCs in the southwestern portion of the building and to evaluate the sanitary sewer line as a potential source and migration pathway. Additional information on the depth and flow direction for the sanitary sewer line is needed to assess

whether the line is a potential source of the contamination encountered. Please evaluate the potential for indoor vapor intrusion at off-site locations and present your plans to address this data gap in the Work Plan requested below.

5. **Preferential Pathway Study.** We request that you complete a preferential pathway survey for the site to evaluate whether any potential conduits (wells, storm drains, sanitary sewer, pipelines etc.) could potentially act as preferential pathways for contaminant migration. The purpose of the survey is to determine the potential of petroleum hydrocarbons, chlorinated solvents or dissolved metals encountering a preferential pathway, resulting in the dispersion of contamination in subsurface. Discuss your analysis and interpretation of the results of the preferential pathway study and report your findings in the Work Plan requested below. Also, please provide a map showing the location of utilities that may act as preferential pathways.
  - a. **Well Survey.** ACEH request that you locate all wells (monitoring and production wells: active, inactive, standby, decommissioned, abandoned dewatering, drainage and cathodic protection wells) within ½ mile of the subject site. We request that you obtain well information from both Alameda County Public Works Agency and the State of California Department of Water Resources, at a minimum. Submittal of maps showing the location of all wells identified in your study, and the use of tables to report the data collected as part of your survey are required. Please present your results in the Work Plan requested below.
  - b. **Utility Survey.** An evaluation of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) which act as preferential pathways for contaminant migration is required as part of your survey. Submittal of maps showing the location and depth of all utility lines and trenches within and near the site is required and should be submitted in the Work Plan requested below.

#### **TECHNICAL REPORT REQUEST**

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

- **September 30, 2006** – Work Plan for Soil, Soil Gas and Groundwater Investigation and Preferential Pathway Study

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**

Effective **January 31, 2006**, 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)).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at [steven.plunkett@acgov.org](mailto:steven.plunkett@acgov.org).

#### 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.

#### 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

Gabriel Chui  
August 20, 2006  
Page 5

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

cc: Peter McIntyre  
AEI Consultants  
2500 Camino Diablo, Suite 200  
Walnut Creek, CA 94105

Adrian Angel  
AEI Consultants  
2500 Camino Diablo, Suite 200  
Walnut Creek, CA 94597

Donna Drogos, ACEH  
Steven Plunkett, ACEH  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT  
11-30-05

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

November 29, 2005

Gabriel Chiu  
C/o Bruce Burrows  
Main Street Property Services, Inc.  
986 Moraga Road, Suite 202  
Lafayette, CA 94549

Subject: SLIC Case No. RO0002863, Crow Canyon Cleaners, 7242 San Ramon Road, Dublin, CA – Work Plan Approval

Dear Mr. Chiu:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Site Investigation Work Plan," dated November 21, 2005, prepared on your behalf by AEI Consultants. The work plan proposes a scope of work to collect and analyze soil, groundwater, and soil vapor samples from 7 borings. ACEH concurs with the proposed scope of work provided that two of the proposed boring locations are moved as shown on the attached Revised Figure 3 and discussed in the technical comments below.

We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

**TECHNICAL COMMENTS**

- 1. Base Map.** The base map (Figures 2 and 3) for the site currently shows Amador Valley Road trending in a north-south direction east of the site. Amador Valley Road is a generally east-west trending road. Please correct or revise the base map accordingly.
- 2. Proposed Boring Locations.** Based on local topography, the expected groundwater flow direction is to the east southeast. ACEH requests that proposed soil boring SB-6 be located directly downgradient from the suspected source area as shown on the attached Revised Figure 3. The proposed location for boring SB-7 should also be moved to the north to compensate for the revised location of boring SB-6.
- 3. Groundwater Monitoring Wells.** ACEH recommends that the proposed monitoring wells not be installed until sampling results from the proposed soil borings are reviewed. ACEH concurs that installation of the monitoring wells may not be necessary if the extent of groundwater contamination is limited.

### TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **April 21, 2006** – Site 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) 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_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

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**

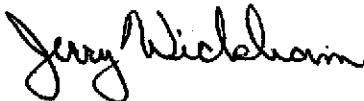
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

**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) 567-6791.

Sincerely,



Jerry Wickham  
Hazardous Materials Specialist

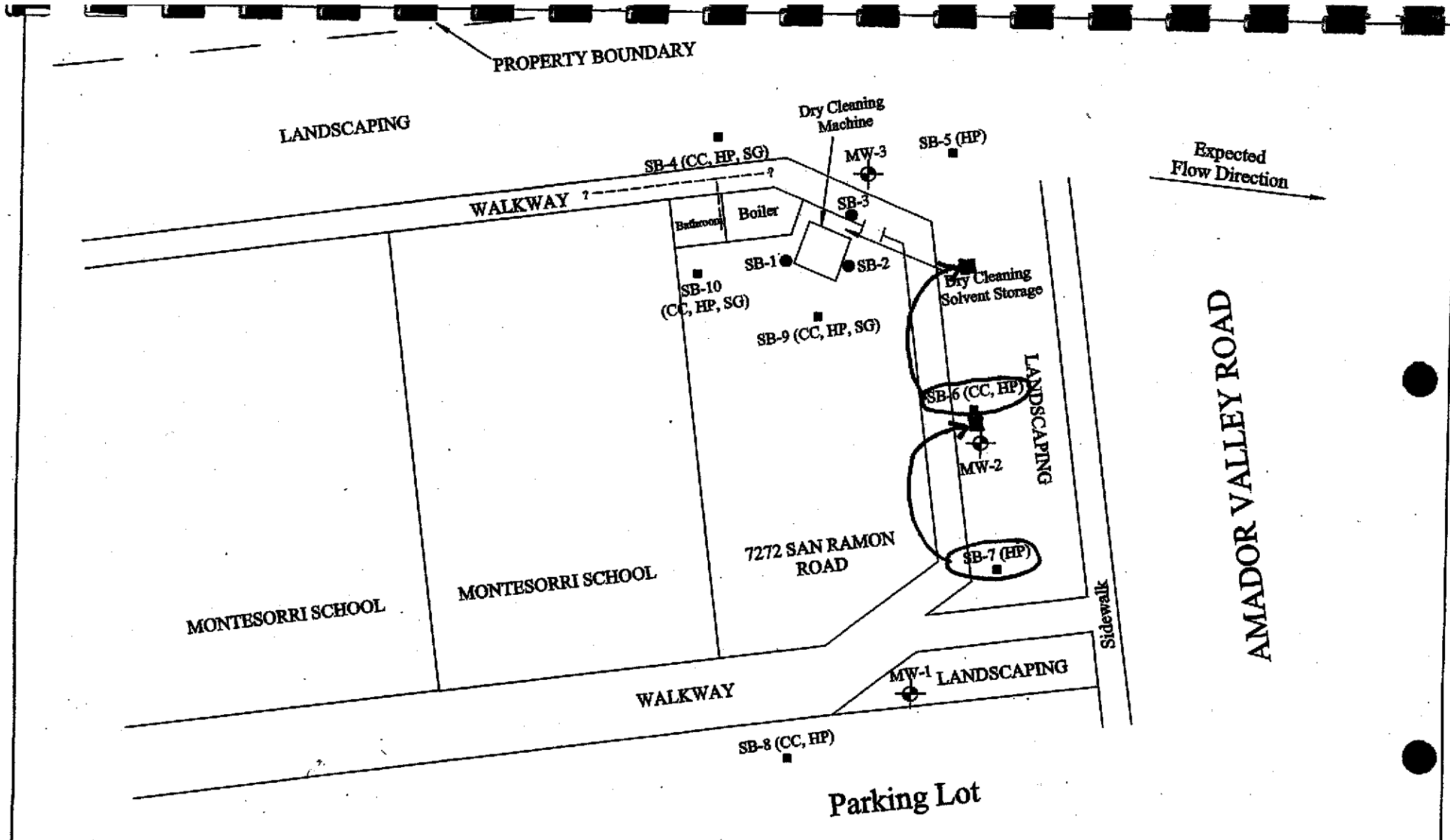
Enclosures: Revised Figure 3 – Site Plan  
ACEH Electronic Report Upload (ftp) Instructions

cc: Colleen Winey, QIC 80201  
Zone 7 Water Agency  
100 North Canyons Parkway  
Livermore, CA 94551

Peter McIntyre  
AEI Consultants  
2500 Camino Diablo, Suite 200  
Walnut Creek, CA 94597

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File





\*CC = continuous coring, HP = hydropunch, SG = soil gas

**LEGEND:**

- ⊕ Proposed Monitoring Well Location
- Proposed Soil Boring Locations
- Soil Boring Locations (01/27/05)
- Sewer Line
- - - - - Property Boundary

1 INCH = 20 FEET

Revised Figure 3

<b>AEI CONSULTANTS</b>	
2500 CAMINO DIABLO BLVD, SUITE 200, WALNUT CREEK, CA	
<b>SITE PLAN</b>	
7272 SAN RAMON ROAD DUBLIN, CA 94568	<b>FIGURE 3</b> PROJECT NO. 11172

ALAMEDA COUNTY  
HEALTH CARE SERVICES



SENT  
8-31-05

AGENCY  
DAVID J. KEARS, Agency Director

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

August 30, 2005

Gabriel Chiu  
C/o Bruce Burrows  
Main Street Property Services, Inc.  
986 Moraga Road, Suite 202  
Lafayette, CA 94549

Subject: Toxics Case No. RO0002863, Crow Canyon Cleaners, 7242 San Ramon Road, Dublin, CA – Request for Work Plan

Dear Mr. Chiu:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the report entitled, "Phase II Report," dated February 8, 2005, prepared on your behalf by AEI Consultants. The report presents the results of soil and groundwater samples collected in January 2005. Analytical data from the soil and groundwater sampling indicate that tetrachloroethene (PCE) was released to soil and groundwater at the site. Additional investigation is required to identify the source and characterize the extent of PCE in soil and groundwater. **ACEH requests that you prepare and submit a Work Plan for a soil and groundwater investigation by October 25, 2005, for the purpose of delineating the horizontal and vertical extent of contamination at the site.**

We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

**TECHNICAL COMMENTS**

- 1. Lateral and Vertical Extent of Soil and Groundwater Contamination.** PCE and trichloroethene were detected in shallow soils and groundwater beneath the site. Please propose soil and groundwater sampling to define the lateral extent of contamination. In addition, sampling is required at greater depths than previous samples to define the vertical extent of soil and groundwater contamination. Please present plans to define the extent of soil and groundwater contamination in the Work Plan requested below.
- 2. Locations of Sewer Lines, Drains, or Other Potential Locations of Discharges.** Please show on a site figure, the locations of sanitary sewer lines, floor drains, or other potential points where solvents could have been released at the facility. These potential discharge locations are to be targeted for investigation. Please present the site figure with these locations in the work plan requested below.
- 3. Soil Vapor Survey.** Please consider the use of soil vapor sampling to locate possible source areas, if necessary. A soil vapor sample would be used as a first phase of

investigation to focus subsequent soil and groundwater sampling on areas of likely or potential solvent discharges.

4. **Site Conceptual Model.** The development of a Site Conceptual Model (SCM) for this site is encouraged in order to provide a framework for understanding the site conditions affecting the fate and transport of contaminants in the subsurface. A SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely magnitude of potential impacts to receptors. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. At this point, the SCM is said to be "validated." The validated SCM then forms the foundation for developing the most cost-effective corrective action plan to protect existing and potential receptors.

When performed properly, the process of developing, refining and ultimately validating the SCM effectively guides the scope of the entire site investigation. We have identified, based on our review of existing data, some key data gaps in this letter and have described several tasks that we believe will provide important new data to refine the SCM. We request that your consultant develop a SCM for this site, identify data gaps, and propose specific supplemental tasks for future investigations. There may need to be additional phases of investigations, each building on the results of the prior work, to validate the SCM. Characterizing the site in this way will improve the efficiency of the work and limit its overall cost.

The SCM approach is endorsed by both industry and the regulatory community. Technical guidance for developing SCMs is presented in API's Publication No. 4699 and EPA's Publication No. EPA 510-B-97-001; and "Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Appendix C," prepared by the State Water Resources Control Board, dated March 27, 2000.

The SCM for this project shall incorporate, but not be limited to, the following:

- a) A concise narrative discussion of the regional geologic and hydrogeologic setting obtained from your background study. Include a list of technical references you reviewed, and copies (photocopies are sufficient) of regional geologic maps, groundwater contours, cross-sections, etc.
- b) A concise discussion of the on-site and off-site geology, hydrogeology, release history, source zone, plume development and migration, attenuation mechanisms, preferential pathways, and potential threat to downgradient and above-ground receptors. Be sure to include the vapor pathway in your analysis. Maximize the use of large-scale graphics (e.g., maps, cross-sections, contour maps, etc.) and conceptual diagrams to illustrate key points. Include structural contour maps (top of unit) and isopach maps to describe the geology at your site.
- c) Identification and listing of specific data gaps that require further investigation during subsequent phases of work.

- d) Proposed activities to investigate and fill data gaps identified above.
- e) The SCM shall include an analysis of the hydraulic flow system at and downgradient from the site. Include rose diagrams for groundwater gradients. The rose diagram shall be plotted on groundwater contour maps and updated in all future reports submitted for your site. Include an analysis of vertical hydraulic gradients. Note that these likely change due to seasonal precipitation and pumping.
- f) Temporal changes in the plume location and concentrations are also a key element of the SCM. In addition to providing a measure of the magnitude of the problem, these data are often useful to confirm details of the flow system inferred from the hydraulic head measurements. Include plots of the contaminant plumes on your maps, cross-sections, and diagrams.
- g) Other contaminant release sites exist in the vicinity of your site. Hydrogeologic and contaminant data from those sites may prove helpful in testing certain hypotheses for your SCM. Include a summary of work and technical findings from nearby release sites and incorporate the findings from nearby site investigations into your SCM.

Report the applicable information discussed above in your initial SCM and include it in the Work Plan requested below. Include updates to your SCM in the Soil and Groundwater Investigation Report requested below.

#### **TECHNICAL REPORT REQUEST**

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **October 25, 2005 - Work Plan for Soil and Groundwater Investigation**
- **120 days after ACEH approval of Work Plan – 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) 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_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**

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.

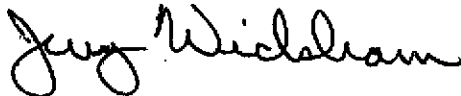
#### **AGENCY OVERSIGHT**

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.

Gabriel Chiu  
August 30, 2005  
Page 5

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham  
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Colleen Winey, QIC 80201  
Zone 7 Water Agency  
100 North Canyons Parkway  
Livermore, CA 94551

Peter McIntyre  
AEI Consultants  
2500 Camino Diablo, Suite 200  
Walnut Creek, CA 94597

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R02863

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(415)

May 21, 1991

Mr. John Murray  
Hallenbeck and Associates  
1485 Park Avenue  
Emeryville, CA 94608

Dear Mr. Murray:

As requested in your letter dated March 28, 1991, the Alameda County Department of Environmental Health, Hazardous Materials Division, has reviewed its facility, underground storage tank (UST), and emergency response files for information relevant to your March 28 request. You may recall that the scope of the Department's search was modified from that originally requested March 28th, following our telephone conversations April 1 and May 17, 1991.

The new scope was to provide a listing of UST and hazardous waste generator sites at addresses on the listed streets within an approximate 1 mile radius from the subject site, and emergency responses occurring in proximity to the subject site; Proposition 65 and UST leak report files were not included in this data search.

The results of this search are presented below, in the order listed in the March 28 request. Only those streets for which information was found are listed:

	STREET / FACILITY NAME	ADDRESS	STATUS
	<u>Amador Valley Boulevard</u>		
(R0880)	Amador Unocal #5366	7375	UST (3), generator
	Glory's Cleaners	7988	generator
	PIP Printing	7992	generator
	George Gray Shell	7194	UST (*), generator
	Express Gas	7600	UST (4)
(R0242A)	Exxon #7-0210	7840	UST (3)
(R0482)	Unocal #7176	7850	UST (4)

\* Denotes tanks which have been removed

Mr. John Murray  
RE: Site search, Castro Valley, Job 6432.1  
May 21, 1991  
Page 2 of 3

Dublin Boulevard

Coastal Steel Detail	11887 A	generator
(R0213) Dublin Shell/Food Mart	11989	UST (4)
(R0890) Unocal #5901	11976	UST (3), generator
Standard Meter	11815	generator
Hexcel Control R & D	11711	UST (1), generator
Crown Chevrolet	7544	UST (2), generator
(R02470) Shamrock Ford	7499	UST (2), generator

Dublin Canyon Road

empty lot	8555	abandoned drums of waste oil, one dumped into drainage
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East Castro Valley Blvd.

Dry Clean USA	3937	generator
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San Ramon Road

(R0206) Rich's Chevron	7007	UST (3), generator
Dublin Iceland	7212	generator
(R02863) Crow Canyon Dry Clean	7272	generator
Harvey's 1-Hour Dry Clean	8917	generator
(R02744) Alcosta Shell	8999	UST (4)

Villareal Drive

C. V. Fire Station #4	6901	UST (1)
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Mr. John Murray  
 RE: Site Search, Castro Valley, Job 6432.1  
 May 21, 1991  
 Page 3 of 3

**EMERGENCY RESPONSE****DATE**

Spill of possible concrete powder on Hwy 580 at Eden Canyon exit	2/13/91
Paint leak from truck carrying container, westbound Hwy 580 at Eden Canyon	9/8/90
Clandestine drug lab bust, 18921 Almond Ave., Castro Valley	7/29-30/90

As we discussed on the phone, the vast majority of streets listed in the March 28 correspondence are residential. The number of regulated businesses which may be located in these areas is limited as a result. Further, many areas in proximity to the subject site are still undeveloped; in fact, areas north, south and west of the site are still largely engaged in some form of agricultural activity (e.g., ranches and farms). Underground storage tanks found on ranches and farms are most often exempt from the underground storage tank laws in California. Hence, records pertaining to such tanks are, at best, limited.

This letter contains information limited to files located in this office, and does not reflect data that may be available from other agencies or parties, such as the Regional Water Quality Control Board or other county entities. The information presented herein is further limited by the reduced scope agreed upon during our telephone conversations April 1 and May 17, 1991.

At this time, you will be billed for provision of the current services of this Division at the rate of \$67 per hour; enclosed is a copy of the invoice sent to our Billing Unit.

Please contact me at 415/271-4320 should you have any questions.

Sincerely,

  
 Scott O. Seery, CHMM  
 Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health  
 Edgar Howell, Chief, Hazardous Materials Division  
 files