

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

September 20, 2007

James Gotcher
City of Pleasanton Public Works
P.O. Box 520
Pleasanton, CA 94566-0802

Subject: Fuel Leak Case No. RO0002923 and Geotracker Global ID T06019727284, City of Pleasanton Fire Station #1, 4444 Railroad Avenue, Pleasanton, CA 94566 – Work Plan Comments

Dear Mr. Gotcher:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site, including the recently submitted document entitled, "Site Investigation Workplan Fire Station No. 1, 4444 Railroad Avenue, Pleasanton, California," dated August 10, 2007. Two paper copies of the Work Plan were received by ACEH on September 14, 2007. Please note that ACEH requires submission of all reports in electronic form to the county's ftp site; paper copies of reports are not accepted. In order to expedite the implementation of the work, we have reviewed and provided comments on the hard copy submittal. However, submittal of the report in electronic format is still required. Therefore, we request that you submit the "Site Investigation Workplan Fire Station No. 1, 4444 Railroad Avenue, Pleasanton, California," dated August 10, 2007 in electronic format to the county's ftp site according to the attached instructions and to the State's Geotracker website.

The Work Plan, which was prepared on behalf of the City of Pleasanton by Kleinfelder, presents plans for one soil boring in the area of two former USTs. The proposed scope of work is acceptable and may be implemented provided that the technical comments below are addressed during the proposed field investigation. 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.

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

TECHNICAL COMMENTS

1. **Proposed Soil Boring Location and Figure.** The "Site Plan with Proposed Boring Locations," figure in Appendix A is not of sufficient quality or detail to show the proposed boring location. The figure in Appendix A does not have a scale, has an inaccurate north arrow, does not show the former tank pit, lacks detail, includes unidentified features, and shows two apparent locations for boring RR-1. In addition, the figure in Appendix A is not consistent with the previous hand drawn figure from the report entitled, "Final Closure Report for UST Removal," dated October 14, 1996 which is included as Attachment A. The

proposed soil boring is to be located along the western end of the former tank pit within 10 feet of the edge of the former tanks. An aerial photograph of the site is included as Attachment B for your reference. If you are uncertain as to the location of the former tank pit, please submit a more detailed figure showing the proposed boring location to this office prior to implementation. A more detailed and accurate site plan showing the former tank pit, pump island, property boundaries, concrete pads, nearby buildings, and boring locations must be included in the Site Investigation report requested below.

2. **Proposed Soil Sampling.** We request that soils from the proposed direct push soil boring be screened in the field as the boring is advanced. Soil samples are to be collected for laboratory analysis from any zones where visible staining, odor, or elevated PID readings are observed. If visible staining, odor, or elevated PID readings are observed, a sufficient number of soil samples must be collected to characterize the vertical interval over which the contamination occurs. If no visible staining, odor, or elevated PID readings are observed, the collection of soil samples at depths of 10 and 30 feet bgs for laboratory analysis is acceptable. Please present boring logs, screening results, and analytical data for soil samples in the Site Investigation Report requested below.
3. **Proposed Laboratory Analyses.** The proposed laboratory analyses for TPH as gasoline, TPH as diesel, BTEX, and fuel oxygenates for soil and groundwater samples are acceptable. In addition, we request that soil samples be analyzed for 1,2-dichloroethane and ethylene dibromide using EPA Method 8260 and total lead using EPA Method 6010B. We request that 1,2-dichloroethane and ethylene dibromide be included as analytes using EPA method 8260 for groundwater samples.
4. **Professional Certification.** In future reports, please provide the registration number of the licensed professional signing the report. In addition, we require that technical reports be stamped by the professional signing the report.

TECHNICAL REPORT REQUEST

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

- **January 31, 2008** – 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

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

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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).

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.

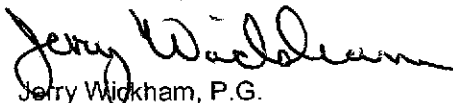
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AGENCY OVERSIGHT

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, P.G.
Hazardous Materials Specialist

Attachment A: Site Plan from "Final Closure Report for UST Removal," dated October 14, 1996 and prepared by W.A. Craig, Inc. and Site Plan from Appendix A of August 10, 2007 Work Plan

Attachment B: Aerial Photograph of Site

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

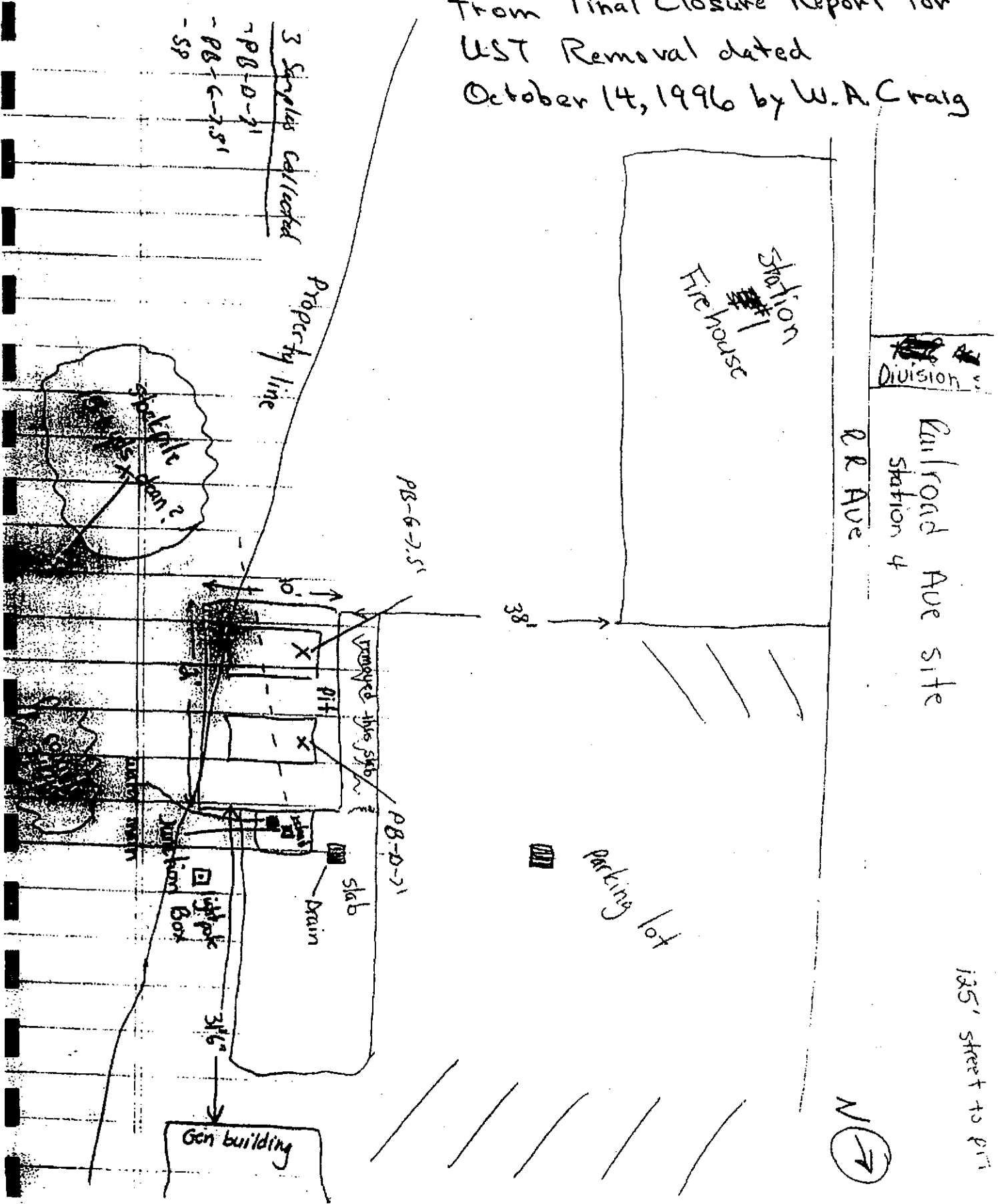
Danielle Stefani
Livermore-Pleasanton Fire Department
3560 Nevada Street
Pleasanton, CA 94566

James Lehrman
Kleinfelder West, Inc.
7133 Koll Center Parkway
Pleasanton, CA 94566

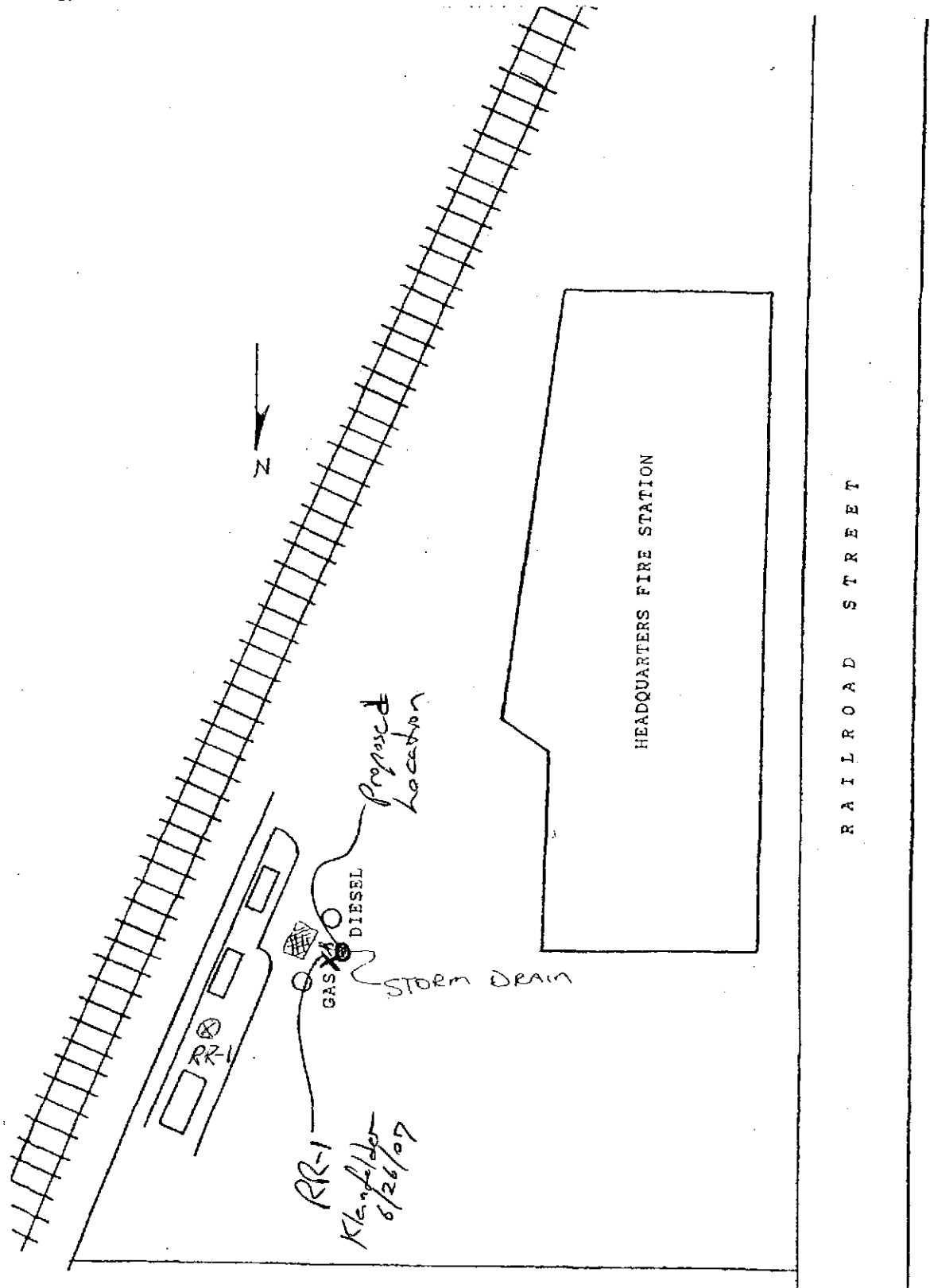
Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Attachment A (1 of 2)

From Final Closure Report for
UST Removal dated
October 14, 1996 by W.A. Craig



PLEASE SHOW THE BUILDINGS AND PROPERTY LINES OF YOUR LOT. UNLESS YOUR SURVEYOR OR CITY ENGINEER OR THE ENGINEER OF THE DISTRICT OF COLUMBIA HAS ADVISED OTHERWISE, SHOW THE LOCATION OF ALL UTILITIES AND EGRESS ROUTES. IF POSSIBLE, SHOW THE LOCATION OF ALL UTILITIES AND EGRESS ROUTES.



Attachment A (2 of 2)

From Site Investigation Work Plan dated August 10, 2007

Attachment B

