

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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September 20, 2007

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

Subject: Fuel Leak Case No. RO0002938 and Geotracker Global ID T0600194363, City of Pleasanton Fire Station #3, 3200 Santa Rita Road, 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. 3, 3200 Santa Rita Road, 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. 3, 3200 Santa Rita Road, 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 proposed location of the one soil boring for the site is acceptable. However, we request that you improve the quality and detail of the "Site Plan with Proposed Boring Locations," figure in Appendix in future reports. The figure in Appendix A does not have a scale, does not have sufficient detail, and does not show the extent of previous excavations. In addition, the figure in Appendix A shows the gas and diesel tanks in opposite locations from those shown in the previous hand drawn figure from

the report entitled, "Final Closure Report for UST Removal," dated October 14, 1996 by W.A. Craig, Inc. Please present a more detailed and accurate site plan showing the former tanks, excavation, pump island, property boundaries, concrete pads, nearby buildings, and boring locations 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, we request that you collect soil samples at depths of 10, 15, 20, and 50 feet bgs for laboratory analysis. Please present boring logs, screening results, and analytical data for soil samples in the Site Investigation Report requested below. We note that no boring log was included in the Work Plan for boring SR-1. Boring logs are a standard component of environmental investigations and are required.
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 submission of electronic documents to the Alameda County Environmental Cleanup Oversight

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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)).

#### 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.

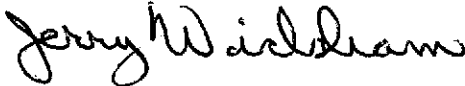
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**AGENCY OVERSIGHT**

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  
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