

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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February 13, 2007

Mr. Chet Green
Clorox Services Company
7200 Johnson Drive
Pleasanton, CA 94588-8004

Subject: SLIC Case RO0002940 and Geotracker Global ID SLT19726987, Clorox, 7200 Johnson Drive, Pleasanton, CA 94588

Dear Mr. Green:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site, including the document entitled, "Work Plan for Subsurface Investigation of Below-Ground Hydraulic Elevator Unit, 7200 Johnson, Drive, Pleasanton, Alameda County, CA," dated December 20, 2006 and prepared on your behalf by Altea, LLC. The Work Plan proposes advancing three soil borings to collect soil and groundwater samples in the area of a below-grade elevator cylinder to investigate the potential extent of soil and groundwater contamination from hydraulic oil released from the elevator system. The Work Plan does not include construction details for the elevator system but indicates that construction details and the history of the elevator system will be reviewed as a pre-field task. Since the construction of the elevator cylinder assembly may be a controlling factor in the distribution of any potential releases from the system, we request that you conduct the review of the elevator system and address the technical comments below prior to implementing a field investigation. Please present the results of the review in a Response to Comments or Revised Work Plan **by April 13, 2007**.

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

TECHNICAL COMMENTS

1. **Construction of Jack Assembly and Steel Casing.** Please review the construction details of the jack assembly and surrounding steel casing to describe any potential locations where hydraulic oil could be released to soil and groundwater outside the casing, such as joints or other openings in the casing. In addition, please describe the condition of the steel casing and the potential for openings or cracks due to corrosion or other deterioration. Including a diagram of the elevator pit, jack assembly, and casing would be beneficial to illustrate the construction of the system. Based on information included in December 18, 2006 correspondence from Altea LLC to Mr. John Rigger of the Livermore-Pleasanton Fire Department, it appears that the casing is open on the bottom, which appears to be a depth of approximately 62 feet below ground surface (bgs). The Work Plan proposes advancing soil borings to a maximum depth of 30 feet below the basement elevator pit floor, which appears to be approximately 50 feet bgs. Following review of the construction details, please modify the proposed boring and soil sampling depths as appropriate or describe the rationale for terminating the borings at depths above the opening at the bottom of the casing. Please

provide this information in the Response to Comments or Revised Work Plan requested below.

2. **Site Plan.** Please provide a site plan in the Response to Comments or Revised Work Plan requested below that shows the site features and proposed boring locations.
3. **Soil Sampling.** The Work Plan indicates that soil borings will be advanced by hollow-stem auger or limited access direct push drilling equipment. Please specify whether soils will be continuously logged and screened in the field using both of the proposed methods. Soil samples are to be collected for laboratory analysis at significant vertical changes in soil type, the top of the capillary fringe, and from zones where visible staining, odor, or elevated PID readings are observed. Please note that 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 soil staining, odor, or elevated PID readings are observed, collection of a minimum of two soil samples from each boring for laboratory analysis at depth intervals identified from the review of elevator system construction as described in technical comment 1, is acceptable. Please present this information in the Response to Comments or Revised Work Plan requested below.
4. **Proposed Laboratory Analyses.** The proposed laboratory analyses for soil and groundwater samples are acceptable.

TECHNICAL REPORT REQUEST

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

- **April 13, 2007** – Response to Comments or Revised 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

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).

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 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

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

Mr. Chet Green
February 13, 2007
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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

Paul Studemeister
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P.O. Box 255251
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Donna Drogos, ACEH
Jerry Wickham, ACEH
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