



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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December 21, 2009

Ms. Carolyn Cooley
US General Services Agency
620 Central Avenue
Alameda, CA 94501

Subject: Spills, Leaks, Investigations and Cleanups (SLIC) Case Number RO0003010 (Global ID #T10000001613), Alameda Federal Bldg 2C, 620 Central Avenue, Alameda, CA

Dear Ms. Cooley:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Work Plan to Evaluate a Pipeline Leak, Remove Affected Soil, Replace the Pipeline, and Restore the Area to its Original Condition," received September 29, 2009 and prepared on your behalf by ENV America (ENV). On September 14, 2009 a release of hydraulic oil was reported in the elevator control room. ENV has prepared this work plan evaluate the extent of the hydraulic oil release and remove contaminated soil, collect confirmation soil samples and sample groundwater (if groundwater is encountered). ACEH generally concurs with the recommendations as proposed in the work plan.

We request that you address the technical comments discussed below and send us the reports requested below. Please provide 72-hour advance written notification to this office (e-mail preferred to steven.plunkett@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Confirmation Soil Sampling.** ENV proposes to collect soil sample at 20-foot intervals along the excavation sidewall and the bottom of the excavation. ACEH requests that soil samples be collected at 10-foot intervals along the sidewalls. In addition, we request that soil sample be collected in either brass or stainless steel sleeves. Please present results from the work plan in the report requested below.
2. **Soil Sampling and Analysis.** It is likely that the elevator and appurtenances were installed during construction possibly over 60 years ago; therefore, we request that you include PCBs in the soil analysis. Please present results from the soil sampling and analysis in the report requested below.

TECHNICAL REPORT REQUEST

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

- **February 26, 2010** – 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).

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

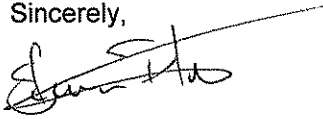
Please note that delays in investigation, late reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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. Should you have any questions, please feel to call me at (510) 383-1767.

Carolyn Cooley
December 21, 2009
RO0003010
Page 3

Sincerely,

A handwritten signature in black ink, appearing to read "Steven Plunkett", with a long horizontal line extending from the end of the signature.

Steven Plunkett
Hazardous Materials Specialist

cc: Charlie Rose
ENV America
244 California Street, Suite 500
San Francisco, CA 94111

Donna Drogos, Steven Plunkett, File