



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
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(510) 567-6700
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October 11, 2011

Ms. Tianna Nourot
Waste Management – California Bay Area
10840 Altamont Pass Road
Livermore, CA 94551
(Sent via E-mail to: TNourot@wm.com)

Southfront LLC
P.O. Box 399
Pleasanton, CA 94566-0399

Subject: Conditional Work Plan Approval for SLIC Case RO0003076 and GeoTracker Global ID T10000003066, Waste Management, 6175 Southfront Road, Livermore, CA 94550

Dear Ms. Nourot:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "*Work Plan for Additional Investigation, Former Waste Management Facility, 6175 Southfront Road, Livermore, California,*" dated September 7, 2011 (Work Plan). The Work Plan, which was prepared on behalf of Waste Management of Alameda County, Inc. by Tetra Tech Geo, presents plans for soil vapor and groundwater sampling.

The proposed scope of work is conditionally approved and may be implemented provided that the technical comments below are addressed and incorporated during the proposed activities. Submittal of a revised Work Plan or Work Plan Addendum is not required unless an alternate scope of work outside that described in the Work Plan and technical comment below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the reports described below

TECHNICAL COMMENTS

1. **Benzene in Soil Vapor.** In correspondence dated June 22, 2011, ACEH requested that you propose additional investigation to assess the extent of elevated concentrations of benzene in soil vapor. The Work Plan concludes that the extent of elevated concentrations of benzene in soil vapor is defined by the existing data and that further investigation is not required. Based upon further review of this issue, we are not requesting additional investigation to assess the extent of elevated concentrations of benzene in soil vapor northwest and west of the former underground storage tanks (USTs) at this time. However, please note that land use restrictions will be required to prevent future exposures in this area of the site.

2. **Vinyl Chloride in Soil Vapor.** In correspondence dated June 22, 2011, ACEH requested that you conduct additional investigation including soil vapor sampling to identify the extent and source of vinyl chloride in soil vapor and other media. The Work Plan proposes the collection of two soil vapor samples near existing soil vapor sample SV-6. This proposed scope of work is clearly not sufficient to define the extent or source of the contamination. In addition to the two proposed soil vapor sample locations, we request that you collect an additional three soil vapor samples at the locations shown on Attachment 1. We also request that you advance one soil boring adjacent to SV-6 to collect one grab groundwater sample. The grab groundwater sample is to be collected using the protocols proposed in Section 2.3.2 of the Work Plan. The grab groundwater sample is to be analyzed for full scan VOCs using EPA Method 8260 and Total Petroleum Hydrocarbons (TPH) as Gasoline, Diesel, and Motor Oil using EPA Method 8015. Please present the results in the Site Investigation Report requested below.

3. **Total Petroleum Hydrocarbons in Groundwater.** The proposal to advance two soil borings in the wash rack area to collect grab groundwater samples is generally acceptable. In each soil boring, we request that soil samples be collected for laboratory analysis from any zones where visible staining, odor, or elevated PID readings are observed. If no visible staining, odor, or elevated PID readings are observed in the borings, a soil sample is to be collected for laboratory analysis at a depth of 5 feet bgs. The soil samples are to be analyzed for TPH as diesel and motor oil using EPA Method 8015M. Please present the results in the Site Investigation Report requested below.

TECHNICAL REPORT REQUEST

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

- **February 12, 2012** – Site Investigation Report

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org. Case files can be reviewed online at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address does not appear on the cover page of this notification, ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

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Attachments: Attachment 1 Figure with Additional Sample Locations
Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Danielle Stefani, Livermore Pleasanton Fire Department, 3560 Nevada St, Pleasanton, CA
94566 (*Sent via E-mail to: dstefani@lpfire.org*)

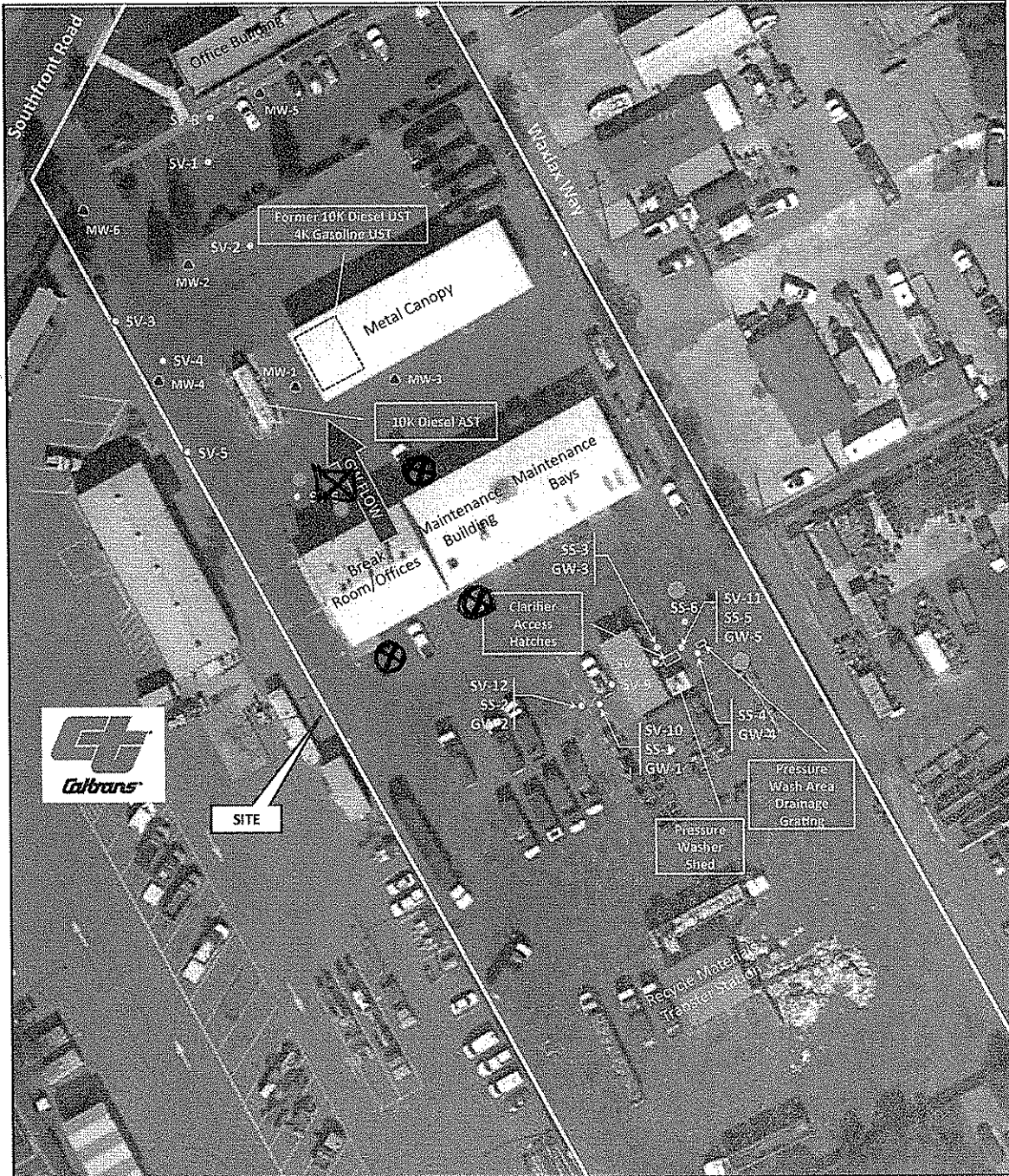
Cheryl Dizon (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA
94551 (*Sent via E-mail to: cdizon@zone7water.com*)

Jim Obereiner, Waste Management, Inc., (*Sent via E-mail to: joberein@wm.com*)

Tim Costello, Tetra Tech, 2969 Prospect Park Drive, Suite 100, Rancho Cordova, CA 95670
(*Sent via E-mail to: tim.costello@tetrattech.com*)

Donna Drogos, ACEH (*Sent via E-mail to: donna.drogos@acgov.org*)
Jerry Wickham, ACEH (*Sent via E-mail to: jerry.wickham@acgov.org*)

GeoTracker, e-File



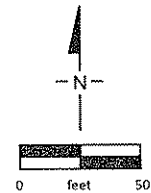
SOURCE: maps.google.com, 2011.

Attachment 1

Legend:

- SCS Limited Phase II Sampling Location (soil vapor, soil and/or groundwater sample), July 27-28, 2010.
- - - -> Sanitary Sewer Line (with direction of flow).
- MW-1 ● Former groundwater monitoring well location (approximate).
- Proposed groundwater sample location for TPH-diesel and TPH-motor oil.
- Proposed soil vapor sample location for Vinyl Chloride.

- ⊗ Additional Soil Vapor Sample Location
- ⊠ Additional Groundwater Sample Location



TITLE: Plot Plan, Previous Sample Locations and Proposed Supplemental Sample Locations			
LOCATION: 6175 Southfront Road Livermore, California			
	CHECKED:	TC	FIGURE: 4
	DRAFTED:	XH	
	FILE:	117-240209101	
	DATE:	08-22-13	

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

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) require submission of reports in electronic form. The electronic copy replaces paper copies 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 all 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, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

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.

REQUIREMENTS

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- **Signature pages and perjury statements must be included and have either original or electronic signature.**
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Submission Instructions

- 1) Obtain User Name and Password
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to deh.loptoxic@acgov.org
 - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses,** and the **Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to deh.loptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.