



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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October 14, 2015

Jennifer Brady  
E&B Natural Resources  
3000 James Road  
Bakersfield, CA 93308  
(Sent via E-mail to: [jbrady@ebresources.com](mailto:jbrady@ebresources.com))

Subject: Conditional Work Plan Addendum Approval for Voluntary Remedial Action Case No. RO0003181 and GeoTracker Global ID T10000007269, GIG Facility Soil Cleanup, 8477 Patterson Pass Road, Livermore, CA 94550

Dear Ms. Brady:

Alameda County Environmental Health (ACEH) has reviewed the case file for the above referenced site including the most recently submitted document entitled, "*Addendum to Work Plan for Soil Excavation and Groundwater Investigation*," dated October 5, 2015 (Work Plan Addendum). The Work Plan Addendum, which was prepared on your behalf by Robert A. Booher Consulting, presents responses to five technical comments in ACEH correspondence dated September 30, 2015.

The proposed scope of work in the Work Plan Addendum is conditionally approved and may be implemented provided that technical comments 1 through 3 below are incorporated during implementation of the groundwater investigation.

#### **TECHNICAL COMMENTS**

- 1. Sequence of Excavation and Investigation Activities.** As described in the "*Soil Excavation and Groundwater Investigation Work Plan*," dated September 16, 2015, the proposed sequence of activities for the site was to complete the expanded excavation prior to the beginning of the rainy season and then advance a soil boring for groundwater investigation at the location of the former leaking stock tank after the excavation was backfilled. We understand from electronic mail messages received during the week of October 5 through October 9, 2015, that there is a potential delay in obtaining an access agreement to expand the excavation to the south. In order to not delay the groundwater investigation which will be within the GIG Facility, we request that you implement the groundwater investigation as soon as possible prior to excavation. Since the location of the former stock tank is currently inaccessible due to the existing excavation, we request that the proposed boring be moved to a location outside the existing excavation immediately west of the former stock tank. Additional borings, if advanced, would be placed at step out locations outside the excavation.
- 2. Soil Sampling.** In order to help assess the depth of soil contamination, we request that the soil boring west of the existing excavation include soil sampling. Soil samples are to be collected on a continuous basis for logging and screening purposes. Soil samples are to be collected for laboratory analysis from any interval where visible staining, odor, or elevated PID readings are observed in the boring. If no visible staining, odor, or elevated PID readings are observed in the boring, we request that soil samples be collected for laboratory analysis at intervals of 5 feet down to first encountered groundwater. The

Jennifer Brady  
RO0003181  
October 14, 2015  
Page 2

soil samples are to be analyzed for the same analytes as the confirmation soil samples. Please present the results in the Groundwater Investigation Report requested below.

- 3. Well Survey.** We request that you complete a well survey that includes review of all water supply wells within 2,000 feet of the site. We recommend that you obtain well information from both the Zone 7 Water Agency and the State of California Department of Water Resources. Submittal of maps showing the location of all wells identified in your study, and the use of tables to report the data collected as part of your survey are required. Please provide a table that includes the well designation, location, total depth, diameter, screen interval, date of well installation, current status, historic use, and owner of the wells. In addition, please provide well logs and completion records for wells downgradient from the site that are potential receptors. Please present these results in the Groundwater Investigation Report requested below.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACEH ftp site (Attention: Jerry Wickham), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **December 21, 2015** – Soil Excavation and Confirmation Soil Sampling Report  
File to be named: REM\_R\_YYYY-mm-dd RO3181
- **December 21, 2015** – Groundwater Investigation Report  
File to be named: SWI\_R\_YYYY-mm-dd RO3181

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org). Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Sincerely,

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

Attachments: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

Jennifer Brady  
RO0003181  
October 14, 2015  
Page 3

cc: Colleen Winey (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551 (Sent via E-mail to: [cwiney@zone7water.com](mailto:cwiney@zone7water.com))

Gary Richardson, E&B Natural Resources (Sent via E-mail to: [grichardson@ebresources.com](mailto:grichardson@ebresources.com))

Phillip Marshall (Sent via E-mail to: [phil@mbenterprises.com](mailto:phil@mbenterprises.com))

Robert Booher, Robert A. Booher Consulting (Sent via E-mail to: [rbooher@raboohherconsulting.com](mailto:rbooher@raboohherconsulting.com))

Jeff Monroe, Robert A. Booher Consulting (Sent via E-mail to: [jmonroe@raboohherconsulting.com](mailto:jmonroe@raboohherconsulting.com))

Dilan Roe, ACEH (Sent via E-mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))

Jerry Wickham, ACEH (Sent via E-mail to: [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org))

GeoTracker, eFile

## 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/](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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> May 15, 2014
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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](mailto: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](mailto: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.