

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Thursday, January 23, 2014 5:06 PM
To: MacLeod, Carryl G; Fischer, Alexis N; 'Flora, Travis'
Cc: Roe, Dilan, Env. Health
Subject: Meeting Followup: RO7 / Chevron 90504; 15900 Hesperian Blvd, San Leandro

Carryl and Travis,

This email is in followup to our meeting of January 21, 2014, to discuss the subject site and the strategy for addressing data gaps under the Low-Threat Closure Policy. A summary of the main points of our discussion is provided below for incorporation into the previously requested focused Site Conceptual Model (SCM). Items discussed include, but were not limited to the following.

TECHNICAL COMMENTS

- 1. Evaluation of the Diesel LNAPL** - Diesel LNAPL was discovered in well C-2 near the tank pit in March 2012 during a groundwater monitoring event. The source mechanism, location, volume, and residual volume of the diesel LNAPL release has not been defined or identified. The lateral and downgradient dimensions of the LNAPL plume have not been defined. Tank tightness tests do not appear to have been submitted.
- 2. Adequacy of the Groundwater Well Network to Define the LNAPL and Dissolved Phase Plumes** – The following data gaps were included in the discussion. Additional data gaps may be noted in your case review.
 - a.** Only soil bore logs for wells C-1 to C-5 have been submitted; well logs have not been submitted to confirm well screen intervals, and that they are capable of capturing representative groundwater concentrations and LNAPL thicknesses.
 - b.** Per LTCP policy papers, groundwater concentrations remain that are considered to be indirect evidence of LNAPL in well C-2.
 - c.** Downgradient wells C-9 to C-11 are submerged and do not appear to delineate the extent of the groundwater plume.
 - d.** Downgradient wells C-9 to C-11 appear to be widely spaced and the downgradient groundwater plume may not be capable of being detected with the current spacing interval.
 - e.** The historic groundwater flow direction ranges substantially more than current rose diagrams suggest, and should be updated to allow an understanding of plume dimensions and delineation.
 - f.** The potential for preference pathways (utilities, including storm drain, and flow line vs. trench total depth determinations) and vicinity water supply wells to affect the dissolved and LNAPL phase groundwater plumes has not been sufficiently evaluated.
 - g.** The potential for other sensitive receptors (basements, crawl spaces, dewatering sump pumps, etc.) to be present in the downgradient direction above the groundwater plume has not been evaluated.
- 3. Direct Contact and Outdoor Air Data Gaps** - Naphthalene concentrations in soil or groundwater do not appear to have been analyzed for in the recent diesel source area; and may not have been analyzed for in the waste oil source area.

TECHNICAL REPORT REQUEST

Per the discussion at the meeting and previous emails, ACEH will extend the submittal date for the SCM and Data Gap Work Plan (if appropriate) to **April 28, 2014**.

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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

I believe this captures the principal points of our discussions, if not all. If you believe I have left something off, please let me know.

Otherwise, should you have questions, please let me know.

Mark Detterman
Senior Hazardous Materials Specialist, PG, CEG
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
Direct: 510.567.6876
Fax: 510.337.9335
Email: mark.detterman@acgov.org

PDF copies of case files can be downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>