



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

May 10, 2012  
(Revised June 20, 2012)

Mr. Eric Frohnapple  
Chevron Corporation  
6101 Bollinger Canyon Rd  
San Ramon, CA 94583

Mr. Gerald Friedkin  
300 Grand Avenue  
Oakland CA 94610

Mr. Joe Zadik  
Express Auto Clinic  
8255 San Leandro Street  
Oakland, CA 94621

(sent via electronic mail to: [ericf@chevron.com](mailto:ericf@chevron.com))

Subject: Conditional Approval of Work Plan; Fuel Leak Case No. RO0000056 and GeoTracker Global ID T0600101108, Chevron #21-1283 / Express Auto Clinic, 3810 Broadway, Oakland, CA 94611

Dear Messrs. Robb, Friedkin, & Zadik:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including the *Second Semiannual 2011 Groundwater Monitoring Report*, dated January 31, 2012, and the *Work Plan for Soil Vapor, Soil and Groundwater Investigation*, dated March 16, 2012. The reports were prepared and submitted on your behalf by Arcadis U.S., Inc (Arcadis). Thank you for submitting the reports. The work plan proposed the installation of three dual completion soil vapor points (installation at 5 and 10 feet bgs) to evaluate the potential for vapor intrusion to offsite properties from site derived contamination, and proposed the installation of five CPT soil bores to characterize site stratigraphy and evaluate for the potential of undocumented offsite migration of contamination missed by the current perimeter monitoring well network and suggested by increasing groundwater contaminant trends in core-zone monitoring well MW-12.

Based on ACEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org)) prior to the start of field activities.

### **TECHNICAL COMMENTS**

- 1) **Work Plan Modifications** – The referenced work plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests several modifications to the approach. Please submit a report by the date specified below.
  - a. **Request for SV-2 Relocation** - The work plan specifies the installation of three dual completion soil vapor points to evaluate the potential for vapor intrusion to offsite properties. The locations generally appear appropriate to evaluate potential lateral and offsite migration of vapor; however, because of residual contamination documented in proximity to tank excavation perimeter soil sample S-4, and the closely associated enclosed space, ACEH requests a location proximal to that sample location. It is understood that CCR Title 8 etc. covers onsite service station workers; however, the location will also evaluate offsite locations to the east and to the north.
  - b. **Request Additional Western Perimeter CPT / Direct Push Bore Location** – Five combination CPT / Direct Push soil bores were proposed to evaluate for potential offsite

contaminant migration. Three CPT bores are proposed for along the western property perimeter. Because of significantly different (granular) lithology at the location of former well MW-3, and due to the former presence of free-phase product (FP) at that location, ACEH requests the addition of a bore in proximity to the former location of well MW-3. This reduces the bore spacing to an approximate 15 foot spacing along this perimeter.

- c. Representative Shallow Soil Samples** – The work plan proposes hand clearing or use of an air knife to a depth of eight feet below grade surface (bgs). ACEH agrees that hand clearing soil bores is an important step, and recognizes that Chevron corporate preferences exist; however, ACEH is concerned that use of an air knife to the proposed depth may preclude collection of important shallow soil data including analytical sample collection. As a consequence, ACEH requests use of a hand auger to clear the soil bores. The use of an air knife to enlarge the bore diameter after soil sample collection is acceptable.
- d. Risk Levels** – The work plan proposes to compare estimated risks for soil gas concentrations to USEPA and CalEPA established target risk ranges of one in one-million to one in ten-thousand ( $1 \times 10E-6$  to  $1 \times 10E-4$ ). ACEH notes that significant justification would be appropriate due to a limited data set if a risk level lower than  $1 \times 10E-6$  is selected.

### **TECHNICAL REPORT REQUEST**

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Mark Detterman), according to the following schedule:

- **July 27, 2012** – Soil and Groundwater Investigation Report
- **July 27, 2012** – First Semiannual 2012 Groundwater Monitoring Report
- **January 11, 2013** – Second Semiannual 2012 Groundwater Monitoring 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.

Should you have any questions, please contact me at (510) 567-6876 or send me an electronic mail message at [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org).

Sincerely,

Mark E. Detterman, PG, CEG  
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations  
Electronic Report Upload (ftp) Instructions

cc: Thomas Potter, Arcadis U.S, Inc, 950 Glenn Drive, Suite 125, Folsom, CA 95630; (sent via electronic mail to: [Thomas.Potter@arcadis-us.com](mailto:Thomas.Potter@arcadis-us.com))

Donna Drogos, ACEH, (sent via electronic mail to [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org))  
Mark Detterman, ACEH, (sent via electronic mail to [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))  
Geotracker, Electronic File

# 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> July 20, 2010
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 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.