



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

July 17, 2014

Ms. Alexis Fischer
Chevron Environmental Management Co.
6101 Bollinger Canyon Road
San Ramon, CA 94583
(Sent via electronic mail to:
AFischer@chevron.com)

Mr. Mark Gomez
City of Oakland
250 Frank Ogawa Plaza, Suite 5301
Oakland, CA 94612
(Sent via electronic mail to:
mmgomez@oaklandnet.com)

Subject: Request Groundwater Plume Analysis; Fuel Leak Case No. RO0000137 and Geotracker Global ID T0600100313, Chevron #9-0019, 210 Grand Avenue, Oakland, CA 94610

Dear Ms. Fischer and Mr. Gomez:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Site Assessment Report*, dated May 22, 2014. The report was prepared and submitted on your behalf by Conestoga-Rovers & Associates (CRA). Thank you for submitting the report.

ACEH has previously evaluated the data presented in the above-mentioned report, in conjunction with case files, to determine if the site is eligible for closure as a low risk site under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on ACEH staff review, we have determined that the site fails to meet the LTCP Media-Specific Criteria for Groundwater and the Media-Specific Criteria for Vapor Intrusion to Indoor Air (see Geotracker for an updated copy).

However, ACEH is of the opinion that limited additional information may allow a determination by ACEH that the site is closable as a low-risk site. Based on the review of the case file ACEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

1. LTCP Media Specific Criteria for Groundwater – To satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites listed in the policy.

Our review of the case files indicates that insufficient data collection and analysis has been presented to support the requisite characteristics of plume stability or plume classification as follows:

- a. **Length of Groundwater Plume** – Based on the grab groundwater sample collected from soil bore B-6 in April 2014 the length of the shallow groundwater plume has not been sufficiently determined. Bore B-6 contained 12,000 micrograms per liter ($\mu\text{g/l}$) Total Petroleum Hydrocarbons as gasoline (TPHg), 17 $\mu\text{g/l}$ benzene, and 520 $\mu\text{g/l}$ ethylbenzene.
- b. **Stable and Decreasing Trend** – Neglecting the temporary reduction of contaminant concentrations in well MW-5 by the introduction of oxygen gas into well MW-5 in 2009, groundwater collected from well MW-5 appears to generally exhibit a stable and slowly declining concentration trend.
- c. **Benzene Concentrations** – The concentration of benzene in well MW-5 has undergone a reduction from up to 18,000 $\mu\text{g/l}$ in May 1992, and was most recently 1,100 $\mu\text{g/l}$ in October 2013. Since March 2012 benzene concentrations in well MW-5 appear to be stable between 1,100 and 1,300 $\mu\text{g/l}$ benzene.

- d. **Distance to Nearest Surface Water Body** – The groundwater flow direction at the site vicinity has historically flowed towards Glen Echo Creek and Lake Merritt. These two downgradient surface water bodies are located approximately 195 to 220 feet from soil bore B-6 and well MW-5, the two locations with the highest residual concentrations of contamination in groundwater at the site.

Monitoring wells MW-7, MW-8, and MW-9 located across Grand Avenue from the site, and in one of the downgradient directions have been consistently non-detectable. Therefore it appears that groundwater contamination is migrating in the shallow gravelly sand unit observed in bores logs from wells MW-4 and MW-5, and borehole B-6. Boring B-6 was advanced to collect a sample from this gravelly unit due to the submerged screen interval in well MW-4. Concentrations of 12,000 µg/l TPHg substantiate the migration of contamination along shallow preferential pathways including the gravelly sand unit and utility trench backfill in Grand Avenue.

It appears that there is significant attenuation occurring in groundwater from MW-5 to B-6; however, there is still a potential for risk to ecological receptors in these adjacent surface water bodies. Therefore, it appears appropriate to conduct a groundwater attenuation analysis utilizing historic groundwater concentrations between MW-5, B-6, and the creek. Therefore, please provide this analysis by the date identified below.

2. **LTCP Media Specific Criteria for Vapor Intrusion to Indoor Air** – The LTCP describes conditions, including bioattenuation zones, which if met will assure that exposure to petroleum vapors in indoor air will not pose unacceptable health risks to human occupants of existing or future site buildings, and adjacent parcels. Appendices 1 through 4 of the LTCP criteria illustrate four potential exposure scenarios and describe characteristics and criteria associated with each scenario.

Our review of the case files indicates that the site data and analysis fail to support the requisite characteristics of one of the four scenarios as described more fully in the May 24, 2013 directive letter. However, ACEH's evaluation indicates that an institution control, namely a site commercial land use restriction coupled with a requirement for case review at the time of any reuse or redevelopment of the parking lot at the site, would allow this criterion to be satisfied. ACEH has not been informed if this would be acceptable to all responsible parties, and requests this information by the date identified below.

Alternatively, this criterion can be satisfied by the collection of soil vapor data in conformance with LTCP requirements. Please note, that if direct measurement of soil gas is proposed, ensure that your strategy is consistent with the field sampling protocols described in the Department of Toxic Substances Control's Final Vapor Intrusion Guidance (October 2011). Consistent with the guidance, ACEH requires installation of permanent vapor wells to assess temporal and seasonal variations in soil gas concentrations.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below, according to the following schedule:

- **September 26, 2014** – Groundwater Plume Length, Attenuation Analysis, Acceptability of a Land Use Restriction; File to be named: RO137_MISC_R_yyyy-mm-dd

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>. If your email address is not listed on the first page of this letter, or in the list of cc's listed below, ACEH is requesting your email address to help expedite communications and to help lower overall costs.

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

Sincerely,

Mark Detterman, PG, CEG
Senior Hazardous Materials Specialist

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

cc: Nathan Allen, Conestoga-Rovers & Associates, 10969 Trade Center Drive, Suite 107, Rancho Cordova, CA 95670; (sent via electronic mail to nallen@croworld.com)

Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Suite 3341, Oakland, CA 94612-2032
(sent via electronic mail to lgriffin@oaklandnet.com)

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

Mark Detterman, ACEH (sent via electronic mail to mark.detterman@acgov.org)
Geotracker, Electronic Files

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: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 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.