



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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May 20, 2016

Mr. Mark Horne
Chevron Environmental Management Co.
6101 Bollinger Canyon Road
San Ramon, CA 94583
(Sent via electronic mail to:
MarkHorne@chevron.com)

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

Subject: Rebound Monitoring and Discharge Sampling; Fuel Leak Case No. RO0000137 and Geotracker Global ID T0600100313, Chevron #9-0019, 210 Grand Avenue, Oakland, CA 94610

Dear Messrs. Horne and Arniola:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file, including the *Amended SGMP and Memo Regarding Mass and Hydrocarbon Migration Calculations*, dated February 19, 2015, that was prepared and submitted on your behalf by Conestoga-Rovers & Associates (CRA; currently GHD). Calculations in the referenced document appear to indicate that hydrocarbon contaminant concentrations from intercepted groundwater contributed from the subject site do not exceed freshwater Environmental Screening Levels (ESLs) at the discharge point for the system at Glen Echo Creek. The discharge point is directly downgradient at a distance of approximately 215 feet to the west of the storm water inlet, and 190 feet from the former western edge of the site.

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

TECHNICAL COMMENTS

1. Groundwater Rebound Monitoring Sampling – As stated above, the referenced calculations appear to indicate that the discharge point concentrations for the stormwater system do not appear to exceed fresh water ESLs. Conversely, review of the most recent groundwater monitoring and sampling report (*Second Semi-Annual 2012 Groundwater Monitoring Report* dated December 12, 2012) indicates that groundwater concentrations in well MW-5 fluctuate significantly with time and limited groundwater elevation changes. For example, between September 2010 and September 2012, Total Petroleum Hydrocarbons as gasoline (TPHg) concentrations fluctuated between 1,900 micrograms per liter ($\mu\text{g/l}$) to 35,000 $\mu\text{g/l}$, and benzene fluctuated between 81 $\mu\text{g/l}$ to 1,300 $\mu\text{g/l}$, while groundwater fluctuated between at 4.37 and 5.33 feet below grade surface (bgs). In general it appears that shallower groundwater earlier in a year coincides with higher groundwater contaminant concentrations.

Because these fluctuations occurred during drought conditions, it appears appropriate to ensure concentration rebound in well MW-5, during this El Nino year, is consistent with drought concentration rebound changes prior to closure.

2. Outfall Sampling – In an effort to develop multiple lines of evidence, it also appears appropriate to sample the stormwater discharge point. Recent site figures and associated utility plans indicate that the stormwater inlet box at the site is the end point of this leg of the stormwater conduit. This appears to be substantiated by a review of the site on Google Earth Street View. No upgradient underground input or surface water inlet boxes are present and thus no upgradient input is possible. Due to the

direct discharge of stormwater to Glen Echo Creek from a positively identified preferential pathway that intercepts contaminated groundwater, it appears that on dry days the sampling of the discharge point will provide representative groundwater attenuation and discharge concentration data for the storm drain at the point of discharge.

Due to a potentially relatively short window to sample the outlet coincident with higher groundwater levels, due to the end of the storm season, ACDHE requests the collection of outfall and groundwater samples, and the submittal of a report, by the identified below.

TECHNICAL REPORT REQUEST

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

- **July 15, 2016** – Groundwater Monitoring Report
File to be named: RO137_GWM_R_YYYY-MM-DD

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

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 E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

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

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

Dilan Roe, ACDEH, (sent via e-mail to dilan.roe@acgov.org)

Mark Detterman, ACDEH, (sent via electronic mail to 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/).

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.