

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

COLLEEN CHAWLA, Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

July 31, 2018

Ms. Carryl MacLeod
Chevron Environmental Management Co.
6101 Bollinger Canyon Road
San Ramon, CA 94583
(Sent via electronic mail to:
cmacleod@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: Request for Closure Response and Request for FS/CAP; Fuel Leak Case No. RO0000137 and Geotracker Global ID T0600100313, Chevron #9-0019, 210 Grand Avenue, Oakland, CA 94610

Dear Ms. MacLeod and Mr. Arniola:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file, including the *Storm Drain Conduit Sampling Report*, dated May 1, 2018, and the *First Semi Annual 2018 Groundwater Monitoring and Sampling Report and Low Threat Closure Request*, dated June 6, 2018. Both reports were prepared and submitted on your behalf by Arcadis, Inc.

The referenced storm drain sampling report found that the storm drain did not appear to be a significant conduit to Glen Echo Creek due to the lack of gravel fill in the storm drain trench, and that consequently the loading of Chemicals of Concern (COCs) to the creek was likely lower than previously estimated. Using a lower hydraulic conductivity appropriate for the silty clay backfill encountered in the storm drain, Arcadis calculated that the mass flux from the storm drain trench to the creek would be approximately 470 micrograms per day ($\mu\text{g}/\text{day}$) Total Petroleum Hydrocarbons as gasoline (TPHg), 63 $\mu\text{g}/\text{day}$ benzene, and 187 $\mu\text{g}/\text{day}$ ethylbenzene. At an estimated stream influent flow rate of 6.1 liters per day, these calculations appear to indicate that the mass flux of COC to Glen Echo Creek from the storm drain meet freshwater Environmental Screening Levels (ESLs) at the point of discharge.

While ACDEH is in general agreement with the conclusions that the storm drain does not appear to be a significant preferential pathway, a review of well bore logs from the site (especially wells MW-4 and MW-5), documents the presence of silty gravel or silty sand between approximately 5.5 and 9 feet below grade surface (bgs) that contain higher hydraulic conductivities than silty clay, and well screens that are fully submerged. For example, well MW-4 is screened between 10 and 15 feet bgs; however, groundwater has essentially never been deeper than approximately 6 feet bgs (6.17 feet in September 2012). Well MW-5 is screened between 7.5 and 15 feet bgs, and groundwater is rarely deeper than approximately 6.5 feet bgs, and historic groundwater concentrations increase markedly at low water periods when the level of groundwater approaches the screen interval, but remains above it. Finally, current groundwater concentrations in well MW-5 (recently between 22,000 and 31,000 micrograms per liter [$\mu\text{g}/\text{l}$] TPHg, and between 970 and 1,800 $\mu\text{g}/\text{l}$ benzene) document the presence of substantial localized residual soil contamination in the vicinity of the well, and potentially offsite in the public right-of-way. ACDEH notes that well MW-6 is appropriately screened but only documented the presence of silty clay or silt at the location of the well, and thus does not indicate the presence of higher conductivity units at that location, and thus may sit off the preferred hydraulic flow path towards the creek.

Therefore, ACDEH has evaluated the data and recommendations presented in the above-mentioned reports, in conjunction with the 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 ACDEH staff review, we have determined that the site does not convincingly meet the LTCP Media-Specific Criteria for Groundwater (see Geotracker) due to the presence of two fresh water surface water bodies as close as approximately 195 feet from the release, and the

uncertainty of well groundwater concentrations due to poorly constructed wells in conjunction with uncertainties in the exact lithology, and unit hydraulic conductivities, between the site and the surface water bodies, as discussed above.

At this juncture ACDEH requests that you to address the Technical Comments provided below and submit the document identified below.

TECHNICAL COMMENTS

1. **Corrective Action Plan** - In an effort to move the case towards closure, and as discussed in the conference call of July 20, 2018, ACDEH requests the submittal of a limited Feasibility Study / Corrective Action Plan (FS/CAP) to substantially decrease residual soil contamination in the vicinity of well MW-5. Please prepare a Draft Corrective Action Plan (Draft CAP) that meets the provisions of section 2725 of the UST regulations (CCR, Title 23, Chapter 16, section 2600, et seq.) and includes the following minimum information:
 - Proposed cleanup goals and the basis for cleanup goals.
 - Brief summary of site characterization data.
 - Receptor information, including sensitive receptors, and potential groundwater receptors.
 - Evaluation of a minimum of three active remedial alternatives including discussion of feasibility, cost effectiveness, estimated time to reach cleanup goals, and limitations for each remedial alternative.
 - Detailed description of proposed remediation including confirmation sampling and monitoring during implementation.
 - Post-remediation rebound monitoring.
 - Schedule for implementation of cleanup.

Public participation is a requirement for the Corrective Action Plan process. Therefore, we request that you submit a Draft CAP for ACDEH review. Upon ACDEH approval of a Draft CAP, ACDEH will notify potentially affected members of the public who live or own property in the surrounding area of the proposed remediation described in the Draft CAP. An example draft public notification flyer will be forwarded under separate cover for modification for the site. Public comments on the proposed remediation will be accepted for a 30-day period.

2. **Electronic Report and Data Upload Compliance** – A review of the case file and the State's Geotracker database indicates that the site is not in compliance with previous directive letters. Compliance is also a State requirement. Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs, including SLIC programs. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites was required in GeoTracker.

At present missing data includes, but may not be limited to recent EDF submittals (last uploaded August 2017), recent GEO MAPS (last uploaded May 2007), and all logs (no historic bore logs uploaded). ACDEH requests notification of, and a list of, the documents uploaded to Geotracker. Please upload all submittals to GeoTracker by the date specified below.

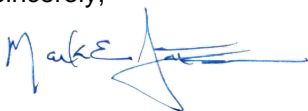
TECHNICAL REPORT REQUEST

Please submit the following technical reports and deliverables to the State Water Board's Geotracker website and notify your case worker by electronic mail (mark.detterman@acgov.org), in accordance with the following specified file naming convention and schedule, as provided below, and in the Responsible Party(ies) Legal Requirements/Obligations which is included as Attachment 1. Please note ACDEH no longer accepts reports on the ftp site.

- **August 17, 2018** – Geotracker Compliance Uploads
Please email your case worker upon completion
- **October 5, 2018** – Draft Feasibility Study / Corrective Action Plan
File to be named: RO137_FSCAP_R_yyyy-mm-dd
- **June 7, 2019** – Groundwater Monitoring Report
File to be named: RO137_GWM_R_yyyy-mm-dd

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 4799, CEG 1788
Senior Geologist
Senior Hazardous Materials Specialist

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

cc: Katherine Szymanowski, ARCADIS, Inc, 2300 Clayton Road, Suite 400, Concord, CA 94520;
(Sent via electronic mail to: Katherine.Szymanowski@arcadis.com)

Dilan Roe, ACDEH, (Sent via electronic mail to: dilan.roe@acgov.org)
Paresh Khatri, ACDEH; (Sent via electronic mail to: paresh.khatri@acgov.org)
Mark Detterman, ACDEH, (Sent via electronic mail to: mark.detterman@acgov.org)
Electronic File; GeoTracker

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) 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 licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.