



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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September 24, 2009

Mr. Aaron Costa  
6001 Bollinger Canyon Road, Room 3360  
PO Box 6012  
San Ramon, CA 94583-2324  
(sent via electronic mail to [acosta@chevron.com](mailto:acosta@chevron.com))

Mr. Shadrick Small  
Oakland Housing Authority  
1805 Harrison Street  
Oakland, CA 94612  
(sent via electronic mail to [ssmall@oakha.org](mailto:ssmall@oakha.org))

Subject: Approval of Two Work Plans With Modifications; Fuel Leak Case No. RO0000143 (Global ID # T0600100304), Chevron #9-0020, 1633 Harrison Street, Oakland, CA 94612

Dear Mr. Costa and Mr. Small:

I have been recently assigned to your case; please send all future correspondence or inquiries to my attention. It will be greatly appreciated. First off, thank you for submitting the *Work Plan for Monitoring Well Installation and Offsite Investigation*, dated June 11, 2009, and *Work Plan for Additional Onsite Investigation*, dated July 24, 2009; each was prepared by Conestoga Rovers Associates (CRA). Based on Alameda County Environmental Health (ACEH) staff review of the referenced documents and of the case file we generally concur with the proposed scope of work, provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed.

We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested 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. **Offsite Groundwater Plume Delineation** – The June 11, 2009 work plan proposes to install two soil bores in the vicinity of well MW-16 to assist in the delineation of the offsite groundwater plume.
  - a. ACEH additionally requests the installation of one soil bore along the north side of 17<sup>th</sup> Street, west of Harrison Street, to fill a data gap in the downgradient extent of delineation.
  - b. The June 11, 2009 work plan does not detail the collection of grab groundwater samples, or sampling protocols, from the proposed downgradient soil bores in the vicinity of well MW-16 to be used to assist in the delineation of the downgradient extent of the dissolved plume. Please ensure grab groundwater samples are collected from the two proposed and the one requested downgradient bores, the grab groundwater collection protocols conform to grab groundwater protocols outlined in the July 24, 2009, work plan for onsite work, and that the analytical suite is as discussed further below at all bore locations.

**2. Clarifications to Work Plans** – With modifications and clarifications ACEH is in general concurrence with the work proposed in both the referenced work plans. These modifications and clarifications include:

- a. **Representative Shallow Soil Samples** - Both work plans propose 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 proposed total depth for hand clearing the bores may preclude collection of important shallow soil data including analytical sample collection. ACEH is also concerned that use of an air knife will volatilize target compounds resulting in low-biased analytical results. As detailed in Figure 2 of both work plans it would appear that adequate lateral control of utility line locations is currently understood, will be further refined through the use of Underground Services Alert (USA), and the use of a private utility locator. Utility line burial depths are also available from City offices. Within these constraints, please collect representative shallow soil bore data. Please ensure proper collection of shallow soil samples includes adequate instrumental screening, sampling, and analysis, if appropriate.
- b. **Collection and Analysis of Soil & Groundwater** – ACEH generally concurs with the proposed collection and the selected analytical suite outlined for soil and groundwater data contained in both work plans; however, ACEH did not locate details for the minimum number of soil samples proposed to be submitted for analysis. Please ensure that the soil samples collected are also analyzed as outlined in the work plans. In addition to your proposed soil sampling, ACEH requests that soil samples be collected and submitted for analysis from the capillary fringe, saturated zone, and areas with high PID readings.

Review of Table 1 *Comprehensive Analytic Results for Soil* contained in the June 28, 2007 *Remedial Action Plan* by CRA, or in other compilations of soil data in the case file did not locate analytical results for EBD and EDC in exploratory soil bores (EBD and other fuel additives were collected at the base of all remedial bucket auger soil bores, and all were non-detectable at the limits of the excavations). Please add this analyte to the soil and groundwater analytical suite for the pending work. Additional sampling may or may not be warranted thereafter depending upon results.

- c. **Well Survey** – ACEH generally concurs with the proposed survey of new well MW-17 to mean sea level contained in the *Work Plan for Monitoring Well Installation and Offsite Investigation*, dated June 11, 2009; however, please ensure the well is also surveyed to Geotracker standards for upload to the Geotracker database.
- d. **Well MW-17 Screen Interval** – The June 11, 2009 work plan indicates that the well screen will be 10 feet in length between 15 and 25 feet bgs. In general, ACEH generally recommends the use of monitoring wells designed with sand pack intervals of 5 feet or less; as these wells will likely be representative of depth discrete groundwater conditions. ACEH in particular calls to your attention the well and bore log for downgradient well MW-9, wherein an apparent 4-inch thick clay within a 11 foot section of fine sand separates the vadose zone from an impacted water-bearing zone. This well used an appropriate 5-foot well screen between 20 to 25 feet bgs (see attachment).
- e. **Semi-Annual Sampling of New Well MW-17** – The *Work Plan for Monitoring Well Installation and Offsite Investigation*, dated June 11, 2009, proposes to sample new well MW-17 semi-annually. Please ensure well MW-17 is monitored and sampled on a quarterly interval for a period of one year.
- f. **Soil Vapor Sampling Protocol** – ACEH generally concurs with the proposed soil vapor sampling protocol. The *Work Plan for Additional Onsite Investigation* dated July 24, 2009, indicates that leak testing will use laboratory grade helium; however, the work plan or Attachment C “Standard Field Procedures” do not specify or otherwise indicate that a shroud will be utilized. Please ensure that a shroud is used for leak testing while collecting the vapor samples.

## **TECHNICAL REPORT REQUEST**

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

- **December 30, 2009** – Soil and Groundwater Investigation Report

Reports are 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.swrcb.ca.gov/ust/electronic\\_submittal/report\\_rqmts.shtml](http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml)).

## **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.

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#### 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.

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  
Hazardous Materials Specialist

cc: Charlotte Evans, Conestoga-Rovers & Assoc., 5900 Hollis Street, Suite A, Emeryville, CA 94608  
(sent via electronic mail to [cevans@croworld.com](mailto:cevans@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](mailto:lgriffin@oaklandnet.com))  
Karl Lauff, Christian Church Homes, 303 Hegenberger Road, Suite 201, Oakland, CA 94621-1419  
(sent via electronic mail to [klauff@cchnc.org](mailto:klauff@cchnc.org))  
Jerian Alexander, Fugro West, Inc., 502 Giuseppe Court, Suite 11, Roseville, CA 95678  
(sent via electronic mail to [jalexander@fugro.com](mailto:jalexander@fugro.com))

Donna Drogos, File

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>ISSUE DATE:</b> July 5, 2005
	<b>REVISION DATE:</b> March 27, 2009
	<b>PREVIOUS REVISIONS:</b> December 16, 2005, October 31, 2005
<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

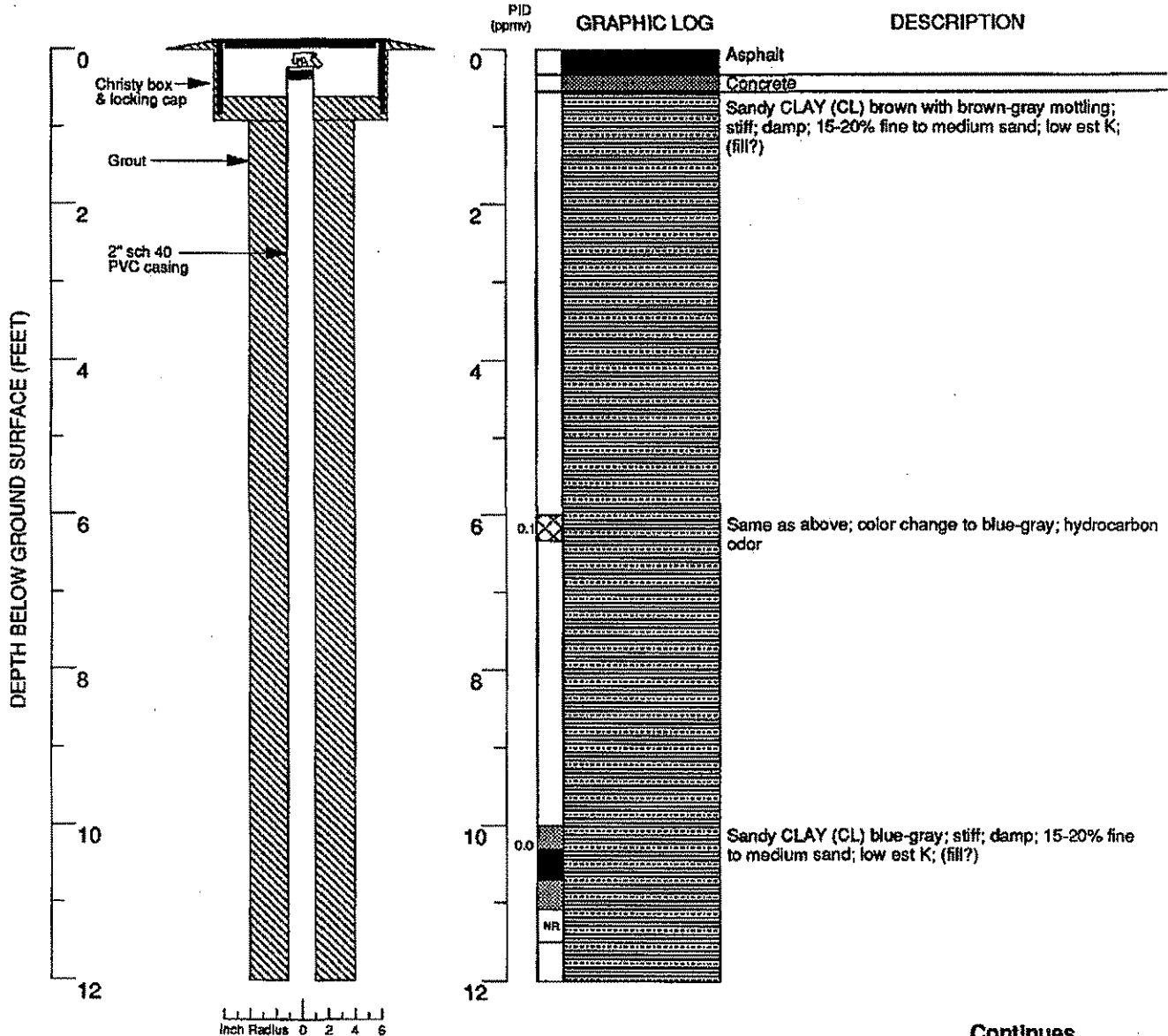
- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (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)

#### Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

#### 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 [dehloptoxic@acgov.org](mailto:dehloptoxic@acgov.org)  
Or
    - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of My Le Huynh.
  - 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 and Firefox browsers will not open the FTP site.
  - b) Click on File, then on Login As.
  - 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 [dehloptoxic@acgov.org](mailto:dehloptoxic@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.



Logged by: Julie Noffke  
Project Mgr: Len Niles  
Dates Drilled: 6/20/90

Drilling Company: B & F Drilling Co., Inc.  
Drilling Method: 8" Hollow stem auger  
Driller: Bruce Cox

Well Head Completion: Christy box & locking cap  
Type of Sampler: 2" split barrel  
TD (Total Depth): 27.5 ft.

**EXPLANATION**

- ☒ Water level during drilling
- ☒ Water level in completed well
- ▨ Location of recovered drill sample
- Location of sample sealed for chemical analysis
- ▩ Sieve sample
- ☒ Grab sample
- Contacts: Solid where certain
- ..... Dotted where approximate
- - - Dashed where uncertain
- ////// Hachured where gradational
- est K Estimated permeability (hydraulic conductivity) 1K = primary 2K = secondary
- NR No recovery

Boring Log and Well Completion Details  
MW-9 (Boring B-16)

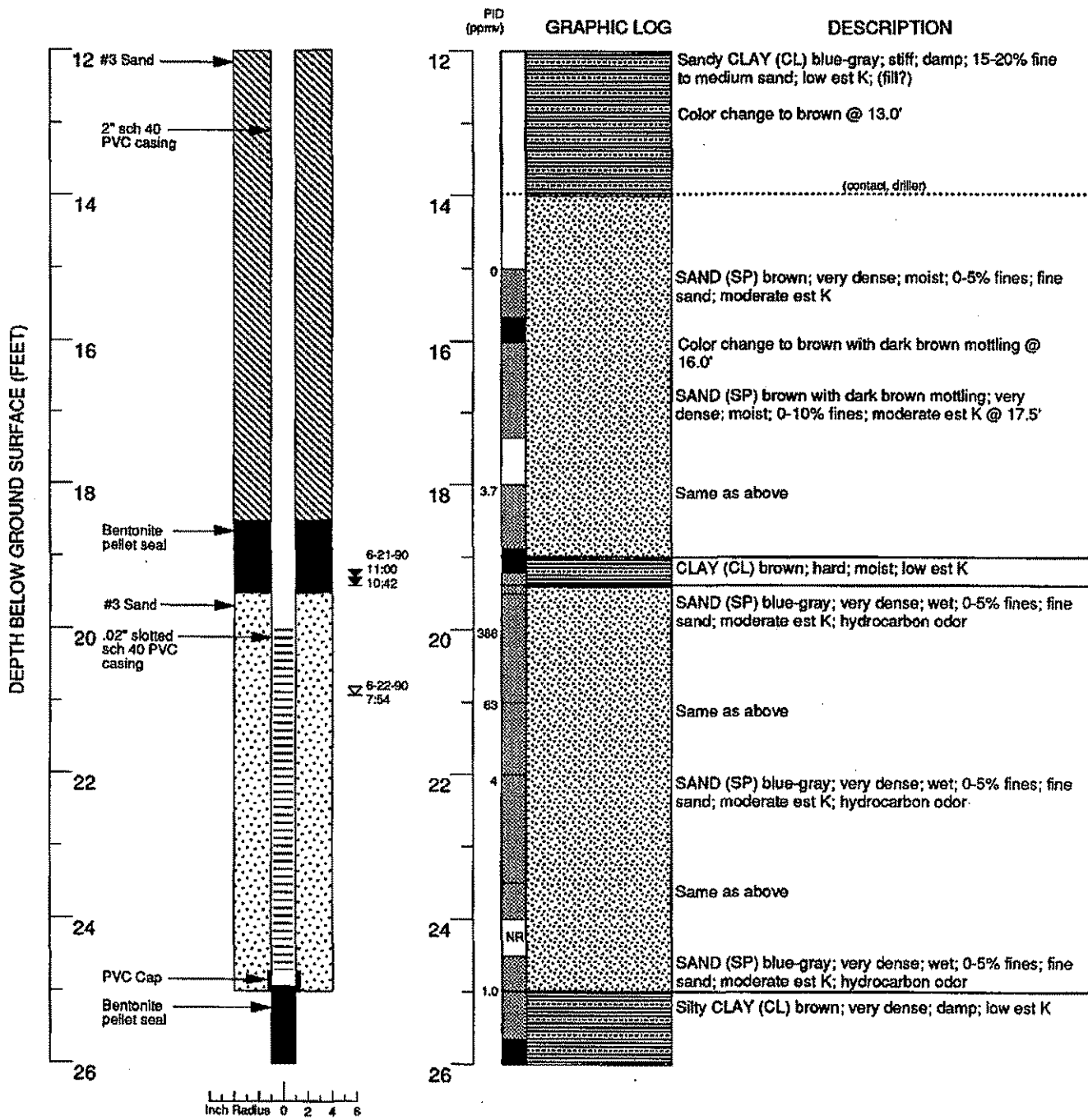
Chevron Service Station #90020  
Oakland, California

WESTERN GEOLOGIC RESOURCES, INC.

MONITOR  
WELL

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1-012.04



Continues

**EXPLANATION**

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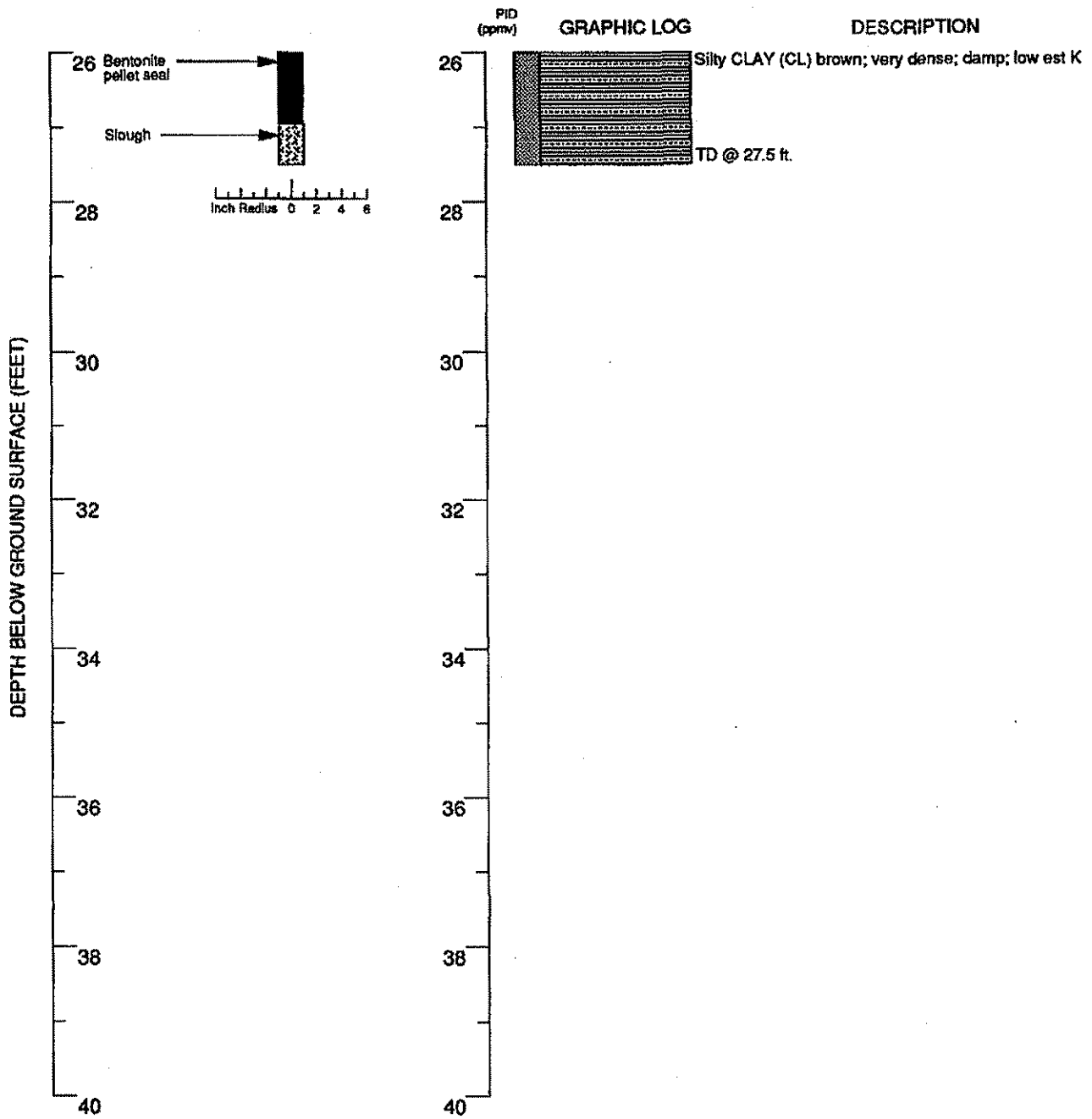
Chevron Service Station #90020  
Oakland, California

WESTERN GEOLOGIC RESOURCES, INC.

MONITOR  
WELL

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1-012.04



EXPLANATION	
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Chevron Service Station #90020  
 Oakland, California

WESTERN GEOLOGIC RESOURCES, INC.

MONITOR WELL

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