



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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January 30, 2009

Stacie Harting-Frerichs
Chevron Corporation
6111 Bollinger Canyon Rd, RM 3596
San Ramon, CA 94583

Steve & Cecilia Simi
Steve & Cecilia Simi Trust
4270 Silverado Trail
Napa, CA 94558-1117

Subject: Fuel Leak Case No. RO0000146 and GeoTracker Global ID T0600101812, Chevron #9-2506, 2630 Broadway, Oakland, CA 94612

Dear Ms. Harting-Frerichs and Mr. & Mrs. Simi:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the document entitled, "Subsurface Investigation Report," dated September 11, 2007, which was prepared by Conestoga-Rovers & Associates (CRA) for the subject site. CRA installed eight borings (B-13 through B-21) to further define the extent of petroleum hydrocarbons in soil and groundwater. CRA also evaluated the depths of utilities in the vicinity of the site to determine whether utility trenches could facilitate preferential groundwater flow for groundwater contaminants.

Based on our review of the above-mentioned report and case file, ACEH requests that you address the following technical comments and send us the technical work plan and reports requested below.

TECHNICAL COMMENTS

1. **Regional Geologic and Hydrogeologic Setting** – As mentioned above, CRA installed eight borings to delineate soil and groundwater contamination. In the September 28, 2006, "Work Plan for Additional Investigation," CRA proposed to collect a groundwater sample "from each boring at first encountered groundwater, and a second sample will be collected at approximately 10 to 15 feet below first encountered water," as approved by ACEH in our October 16, 2006 directive letter. However, it appears that one "grab" groundwater sample was collected from borings B-14, B-17, B-19, and B-20. Although groundwater was encountered at 10 feet bgs in boring B-21 (as stated on Page 4 of the Subsurface Investigation Report), it is not clear why a groundwater sample was not collected or analyzed from boring B-21.

Depth to groundwater, measured in site groundwater monitoring wells, has ranged from approximately 2 to 12 feet bgs. Groundwater was initially encountered at approximately 10 feet bgs in borings B-14 and B-21. According to CRA, groundwater was encountered at 28 feet bgs in borings B-17 and B-18, 17 feet bgs in boring B-19, and 25 feet bgs in boring B-20. According to boring logs for B-17, B-18, and B-20, a permeable sandy layer is encountered between 10 to 15 feet bgs, underlain by a fine-grain unit from approximately 15 to 20 feet bgs. The fine-grain unit is underlain by a permeable sandy unit from approximately 20 to 30

feet bgs, where CRA reported first encountered water. Based on the boring logs and depth to groundwater measurements collected at the site over the last several years, it appears that the first encountered water, reported by CRA, may not be the actual first, shallow water-bearing unit. Please justify that the water samples collected during the subsurface investigation adequately represent groundwater conditions in the first water-bearing zone or submit a scope of work to address the above-mentioned concerns and submit a work plan due by the date specified below. Also, please describe and detail why only one water sample was collected from each boring when the CRA proposed to collect two water samples at distinct depths.

2. **Preferential Pathway Study** – Although the sanitary sewer on Broadway is located below depth to water at the site, CRA believes that due to the primary GW flow direction to the southwest parallel to the utility trenches beneath Broadway, the two 15-foot deep sanitary sewer trenches may have limited roles as preferential pathways. Subsurface utilities on 26th Street and intersection of 26th Street and Broadway are above depth to water measured at the site. Therefore, CRA states that it is unlikely that utilities there act as preferential pathways. ACEH concurs with CRA conclusions.
3. **Soil and Groundwater Characterization** – Currently, soil contamination to the east of the former USTs and dispenser islands remain undefined. Similarly, the dissolved phase hydrocarbon plume remains undefined to the east and southeast of the former USTs and dispenser islands. The intent of the soil and groundwater investigation was to define the extent of soil and groundwater at the site. Specifically, soil and groundwater data obtained from the boring B-13 location could have addressed the above-mentioned data gaps. However, according to CRA, concrete was encountered at 4.9 feet bgs, the boring was not installed, and subsequently, the data gaps remain unaddressed. It is not clear why “step-out” locations were not installed to obtain the data necessary to address the data gaps. Please propose a scope of work to address the above-mentioned concerns and submit a work plan due by the date specified below.
4. **Contaminant Source Area Characterization** – In March 1998, three 10,000-gallon single-wall fiberglass gasoline USTs and one 1,000-gallon single-wall fiberglass waste oil UST were removed from the site. Soil sample analytical results detected TPH-g at a concentration of 1,200 mg/kg in soil sample P-7, benzene at a concentration of 1.4 mg/kg in soil sample P-8. Additionally lead was detected in soil samples P-5 and UO2-8 at significantly elevated concentrations of 5,000 mg/kg and 6,800 mg/kg, respectively.

In November 1998, over-excavation was conducted in the vicinity of soil sample P-5 and P-7 in an attempt to remove the elevated soil contamination at the site. Confirmation soil sample PX-5 did not detect lead above the laboratory detection limit of <7.5 mg/kg. However, confirmation soil sample PX-7 detected TPH-g and benzene at concentrations of 1,190 mg/kg and <2.0 mg/kg respectively, indicating that the site poses a risk to human health and the environment. Although the lead concentration at the P-5 location was significantly reduced as a result of the over-excavation, no excavation occurred in the vicinity of soil sample UO2-8 and TPH-g concentrations remained essentially unchanged in soil sample PX-7. Therefore, the vertical and lateral extent of contamination in the former source areas remains undefined.

Please propose a scope of work to address the above-mentioned concerns and submit a work plan due by the date specified below.

5. **Groundwater Contaminant Plume Monitoring** – Groundwater sample analytical results indicate an increasing contaminant concentration trend in groundwater monitoring well B-9. At this time, please continue semi-annual groundwater monitoring of all wells at the site. Please submit reports by the date specified below.

Please note that the "Second Semi-Annual Groundwater Monitoring Report," dated November 7, 2008, contains analytical tables and laboratory data for a Former Texaco Service Station (Site #211270), located 712 G Street, Davis, California. Please upload the correct report to ACEH and GeoTracker within fifteen (15) days from the date of this letter.

NOTIFICATION OF FIELDWORK ACTIVITIES

Please schedule and complete the fieldwork activities by the date specified below and provide ACEH with at least three (3) business days notification prior to conducting the fieldwork including routine groundwater sampling.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Steven Plunkett), according to the following schedule:

- **February 27, 2009** – Re-submit Quarterly Monitoring Report (3rd Quarter 2008)
- **March 27, 2009** – Soil and Water Investigation Work Plan
- **April 30, 2009** – Quarterly Monitoring Report (1st Quarter 2009)
- **October 30, 2009** – Quarterly Monitoring Report (3rd Quarter 2009)

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.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.

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

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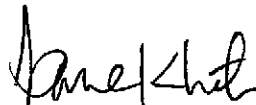
Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 383-1767 or send me an electronic mail message at Steven.Plunkett@acgov.org.

Sincerely,



Steven Plunkett
Hazardous Materials Specialist



Paresh C. Khatri
Hazardous Materials Specialist



Donna L. Drogos, PE
Supervising Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Conestoga Rovers & Associates, 2000 Opportunity Drive, Suite 110, Roseville, CA 95678
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA
94612-2032
Donna Drogos, ACEH
Steven Plunkett, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, 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
or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
- 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 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 at 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)