



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

June 27, 2012

NOTICE TO COMPLY

Ms. Olivia Skance
Chevron Corporation
6101 Bollinger Canyon Road
San Ramon, CA 94583-2324
(sent via electronic mail to:
Olivia.Skance@chevron.com)

Mr. Onsori Ardavan
37 Victoria Drive
Atherton, CA 94027-4122

Frances & Louis Carnazzo
Carnazzo Land Co, Inc, et al
P.O. Box 6031
Atascadero, CA 93423-6031

Ahmad & Shahla Mostofi
37 Victoria Drive
Atherton, CA 94027-4122

Subject: Request for Work Plan and FS / CAP; Fuel Leak Case No. RO0000185 (Global ID #T0600102298), Chevron #9-7127, I 580 and Grant Line Road, Tracy, CA 94550

Dear Ladies and Gentlemen:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Additional Investigation and Well Installation Report*, dated October 25, 2011 and the *First Quarter 2012 Groundwater Monitoring Report*, dated April 10, 2012, each was prepared on your behalf by Conestoga-Rovers & Associates (CRA). The site investigation documented the installation of seven groundwater monitoring wells (MW-9 to MW-15) and five soil bores (SB-8 to SB-12), and the collection grab groundwater samples from those bores in August 2011. Concentrations in soil up to 7,600 mg/kg and 120 mg/kg benzene were documented in the referenced subsurface report. One grab groundwater sample was collected in August 2011, documenting a concentration of 64,000 µg/l TPHg and 24,000 µg/l benzene. In the recent groundwater monitoring report concentrations up to 110,000 µg/l TPHg and 25,000 µg/l benzene were documented in groundwater collected from the recently installed wells, in addition to two wells which contain, and have historically contained, free phase product (up to 2.68 feet, recently at 1.32 feet free-phase). Groundwater concentrations appear to be increasing in these recent wells, and the thickness of free-phase appears to be either increasing or decreasing depending on the specific well (MW-1 and MW-3). Additionally, at present no recent effort to recover free-phase appears to have been implemented at the site as previously requested in ACEHs December 16, 2010 directive letter. This is a drinking water and water resource aquifer. Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below.

TECHNICAL COMMENTS

- 1) Request for a Soil and Groundwater Investigation Work Plan** – It appears appropriate to continue the delineation of the soil, FP, and dissolved-phased plumes beneath the site. The recent installation of wells has contributed to this goal, but requires additional effort to successfully complete the goal. As a consequence ACEH requests that a work plan be submitted by the date identified below.
- 2) Request for FS / CAP** – To date multiple remedial techniques have been briefly applied at the site. These include the installation of a FP skimmer in well MW-1 for several months in 1993, the installation of ORC socks in wells MW-1, MW-2, and MW-4 in August 1998, hydrogen peroxide injections in wells MW-1 and MW-

3 in December 1999, the reinstallation of a FP skimmer in MW-1 in July 2001 and seven groundwater mobile batch extraction events through to April 2002, a vacuum extraction event in July 2002 in well MW-3 that was terminated in October 2002 due to increased FP measurements (which are not supported in groundwater monitoring data from well MW-3 during that period as FP is not reported to be present in well MW-3 until May 2009), the application of three additional batch extraction events in March and April 2007, and a vacuum truck vacuum extraction event in May 2010 in support of a proposed surfactant spot treatment of two wells with free-phase. To date there has not been a sustained effort at remediation at the site. This appears to have allowed the free-phase plume (as well as the dissolved-phase plume) to migrate from the MW-1 source area a minimum of 100 feet downgradient to MW-3 (and beyond), in a drinking water and water resource aquifer. The existing vacuum truck vacuum events appear to indicate a radius-of-influence that would allow installation of an appropriate remedial system that does not rely on surfactant spot targeting that will likely mobilize additional free-phase to the groundwater system beneath the site, which appears to be problematic at best to recover through a free-phase or groundwater extraction approach. Finally, if the July 2002 vacuum extraction event in well MW-3 recorded an increase in free-phase thickness, as was documented only in well MW-1 at the time, this would also imply a vacuum radius-of influence in excess of 100 feet. For these reasons ACEH and the Central Valley RWQCB will not approve a surfactant approach to remedial actions in this water basin. As a consequence, ACEH requests an FS / CAP, and any appropriate pilot tests that may be required, by the date identified below.

The FS/CAP must include a concise background of soil and groundwater investigations performed in connection with this case and an assessment of the residual impacts of the chemicals of concern (COCs) for the site and the surrounding area where the unauthorized release has migrated or may migrate. The FS/CAP should also include, but is not limited to, a detailed description of site lithology, including soil permeability, and most importantly, contamination cleanup levels and cleanup goals, and the time to remediate them, in accordance with the San Francisco Regional Water Quality Control Board (SFRWQCB) Basin Plan and appropriate ESL guidance for all COCs and for the appropriate groundwater designation. Please note that soil cleanup levels should ultimately (within a reasonable timeframe) achieve water quality objectives (cleanup goals) for groundwater in accordance with the SFRWQCB Basin Plan. Please specify appropriate cleanup levels and cleanup goals in accordance with 23 CCR Section 2725, 2726, and 2727 in the FS/CAP.

The FS/CAP must evaluate at least three viable alternatives for remedying or mitigating the actual or potential adverse affects of the unauthorized release(s) besides the 'no action' and 'monitored natural attenuation' remedial alternatives. Each alternative shall be evaluated not only for cost-effectiveness but also its timeframe to reach cleanup levels and cleanup goals, and ultimately the Responsible Party must propose the most cost-effective corrective action.

TECHNICAL REPORT REQUEST

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

- **August 10, 2012** – Second Quarter 2012 Quarterly Groundwater Monitoring
- **August 17, 2012** – FS / CAP and Site Investigation Work Plan
- **November 16, 2012** – Third Quarter 2012 Quarterly Groundwater Monitoring
- **February 15, 2013** – Fourth Quarter 2012 Quarterly Groundwater Monitoring Report
- **60 Days After FS/ CAP Approval** – FS / CAP Implementation Report

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.

Ladies and Gentlemen
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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 E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

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

cc: James Kiernan, 10969 Trade Center Drive, Suite 106, Rancho Cordova, CA 95670
(sent via electronic mail to jkiernan@crawlworld.com)

Donna Drogos, ACEH, (sent via electronic mail to donna.drogos@acgov.org)
Mark Detterman, ACEH, (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: July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 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.