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9:31 am, Oct 08, 2010

Alameda County
Environmental Health

Eric Frohnapple, P.E.
Project Manager
Marketing Business Unit

**Chevron Environmental
Management Company**
6111 Bollinger Canyon Road
San Ramon, CA 94583
Tel (925) 543-5336
Fax (925) 543-2324
ericf@chevron.com

Alameda County Health Care Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Re: Former Chevron Service Station No. 21-1253
930 Springtown Road
Livermore, California

I accept the **Response to the August 30, 2010 Regulatory Letter** dated October 7, 2010.

I agree with the conclusions and recommendations presented in this document. The information included is accurate to the best of my knowledge, and appears to meet local agency and Regional Board guidelines. This **Response to August 30, 2010 Regulatory Letter** was prepared by Conestoga Rovers & Associates, upon whose assistance and advice I have relied.

This letter is submitted pursuant to the requirements of California Water Code Section 13267(b)(1) and the regulating implementation entitled Appendix A pertaining thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Sincerely,

A handwritten signature in black ink that reads "Eric Frohnapple".

Eric Frohnapple, P.E.
Project Manager

Attachment: Response to August 30, 2010 Regulatory Letter



**CONESTOGA-ROVERS
& ASSOCIATES**

5900 Hollis Street, Suite A
Emeryville, California 94608
Telephone: (510) 420-0700 Fax: (510) 420-9170
<http://www.craworld.com>

October 7, 2010

Reference No. 060058

Mr. Jerry Wickham
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Re: Response to August 30, 2010 Regulatory Letter
Former Texaco Service Station 21-1253
930 Springtown Boulevard
Livermore, California
Fuel Leak Case RO000189

Dear Mr. Jerry Wickham:

Conestoga-Rovers & Associates (CRA) is submitting this *Response to August 30, 2010 Regulatory Letter* on behalf of Chevron Environmental Management Company (Chevron) for the site referenced above (Figure 1). In a letter dated August 30, 2010, Alameda County Environmental Health (ACEH) responded to CRA's July 22, 2010 *Pilot Test Work Plan*. ACEH concluded, "Given the limited scope of the proposed pilot test, it is not clear that the pilot test will provide sufficient data to develop a final remedial alternative or would necessarily be compatible with the final remedial alternative for the site," and requested a Draft Corrective Action Plan (CAP) be submitted (Attachment A). Below is our response to the letter.

TECHNICAL RESPONSE

In a previous letter dated July 24, 2009, ACEH requested the submittal of a Pilot Test Work Plan or Draft CAP after four quarters of groundwater monitoring and sampling. During the second quarter 2010 sampling event, light non-aqueous phase liquid (LNAPL) was detected in well MW-14. Therefore, CRA submitted a Pilot Test Work Plan to evaluate LNAPL remediation by performing surfactant-enhanced recovery treatment (SERT) on well MW-14 (Figure 2).

CRA believes pilot testing surfactant is the most expeditious and efficient remedial course to extract recoverable LNAPL beneath the site. By eliminating LNAPL it will allow us to evaluate more remedial options than if LNAPL was present, such as in situ chemical oxidization. Specific procedures and confirmation sampling and monitoring details are presented in CRA's

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**CONESTOGA-ROVERS
& ASSOCIATES**

October 7, 2010

Reference No. 060058

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July 22, 2010 *Pilot Test Work Plan*. After the pilot test is complete, CRA will evaluate additional remedial alternatives as a part of the requested Draft CAP, including the results of the pilot test.

SCHEDULE

CRA proposes to commence work upon receipt of regulatory approval of this work plan. Delivery of surfactant and preparations to begin work will require a minimum of 4 to 6 weeks after site access is granted.

After pilot testing is complete, CRA will prepare and submit a Draft CAP that will include a discussion of the field procedures and pilot test results; site characterization data; sensitive receptor survey; an evaluation of at least three remedial alternatives, including SERT, and details of the selected remedial option and implementation schedule.



**CONESTOGA-ROVERS
& ASSOCIATES**

October 7, 2010

Reference No. 060058

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Please contact Kiersten Hoey at (510) 420-3347 or the Chevron Project Manager Eric Frohnapple at (925) 543-5336 if you have any questions or require additional information.

Sincerely,

CONESTOGA-ROVERS & ASSOCIATES

Kiersten Hoey

Brandon S. Wilken, PG 7564



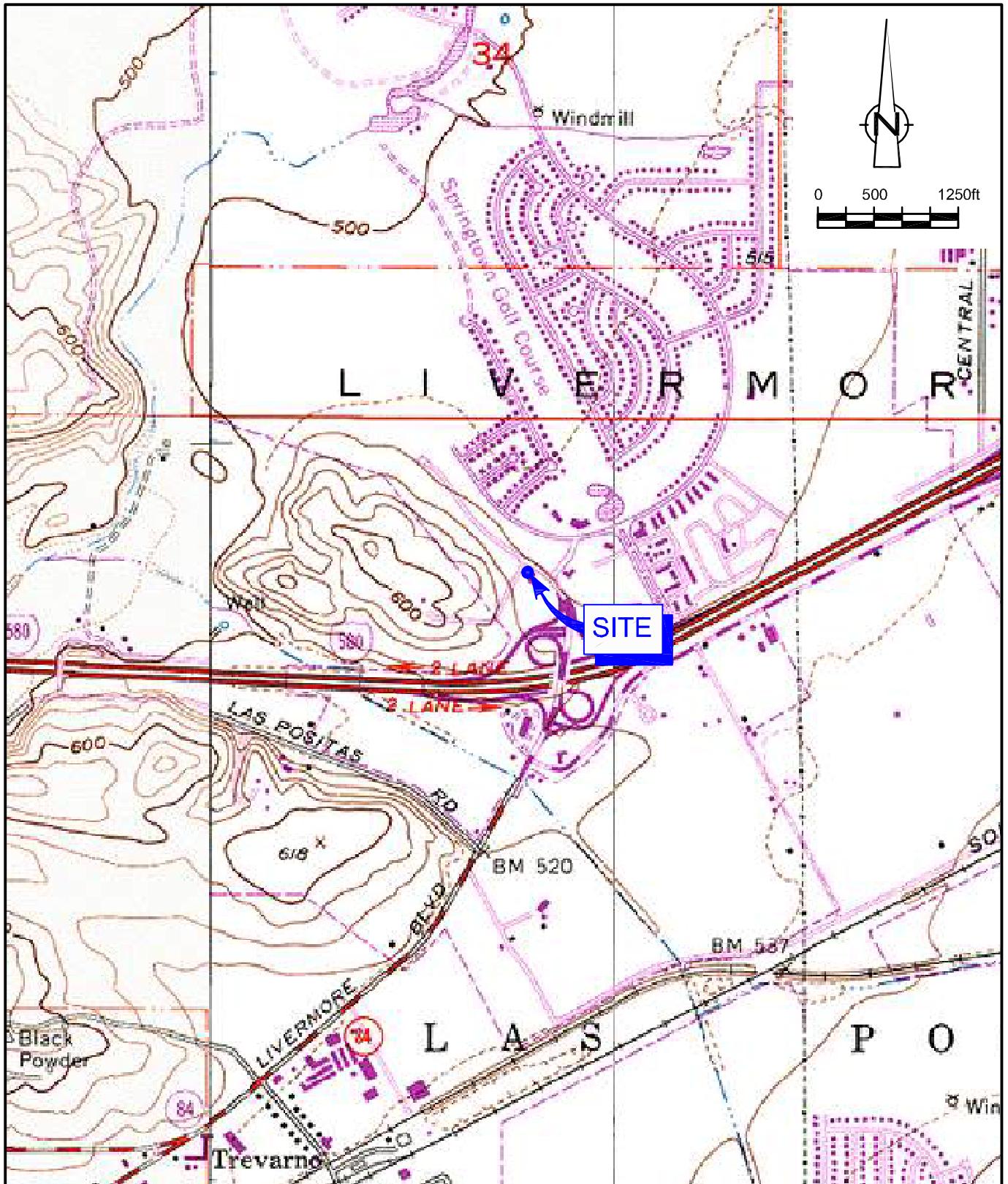
KH/doh/8

Encl.

Figure 1	Vicinity Map
Figure 2	Site Plan
Attachment A	Regulatory Letter

cc: Mr. Eric Frohnapple, Chevron
Mr. Ken Hilliard, Environmental Services, 7-Eleven, Inc.
Mr. Kirk Sniff, Strasburger & Price, LLP

FIGURES



SOURCE: TOPO! MAPS.

Figure 1

VICINITY MAP
 FORMER TEXACO SERVICE STATION 21-1253
 930 SPRINGTOWN BOULEVARD
Livermore, California



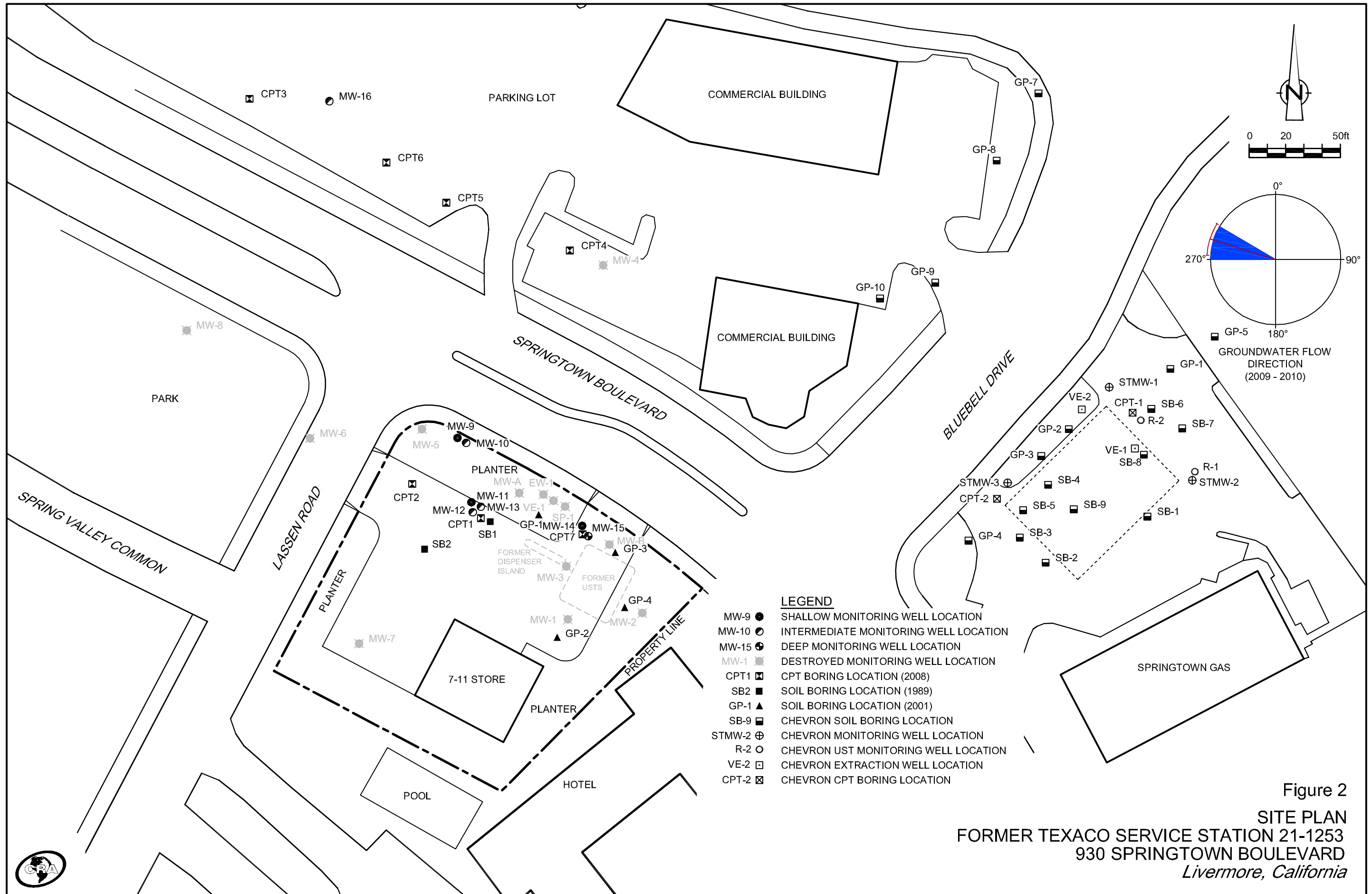


Figure 2
 SITE PLAN
 FORMER TEXACO SERVICE STATION 21-1253
 930 SPRINGTOWN BOULEVARD
 Livermore, California

ATTACHMENT A

REGULATORY LETTER



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

August 30, 2010

Mr. Ian Robb (*Sent via E-mail to: irobb@chevron.com*)
Chevron Environmental Management Company
6001 Bollinger Canyon Rd., K2256
San Ramon, CA 94583-2324

Mr. Ken Hilliard
Environmental Services
7-Eleven, Inc.
One Arts Plaza, 1722 Routh St., Suite 1000
Dallas, TX 75201

Subject: Review of Pilot Test Work Plan for Fuel Leak Case No. RO0000189 and Geotracker Global ID T0600101353, Chevron #21-1253/Texaco, 930 Springtown Boulevard, Livermore, CA 94550

Dear Mr. Robb and Mr. Hilliard:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site, including the recently submitted document entitled, "*Pilot Test Work Plan*," dated July 22, 2010. The Pilot Test Work Plan, which was prepared on Chevron's behalf by Conestoga-Rovers & Associates, proposes the addition of surfactant to monitoring well MW-14 followed by extraction of groundwater to recover the surfactant and mobilized petroleum hydrocarbons.

The purpose of the surfactant-enhanced recovery treatment is to remove light non-aqueous phase liquid (LNAPL) and to prevent NAPL recurrence in well MW-14. Given the limited scope of the proposed pilot test, it is not clear that the pilot test will provide sufficient data to develop a final remedial alternative or would necessarily be compatible with the final remedial alternative for the site. Therefore, we request that you prepare a Draft Corrective Action Plan by October 12, 2010 that meets the criteria in technical comment 1 including the development of target cleanup goals and performance measures.

TECHNICAL COMMENTS

1. **Draft Corrective Action Plan.** Based on the elevated concentrations of the various chemicals of concern that have been detected in soil and groundwater both on-site and off-site, remedial action is required for this site. In order to evaluate remedial actions for the site, we request that you 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.

Mr. Ian Robb
Mr. Ken Hilliard
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- Summary of site characterization data.
- Receptor information including likely future land use scenarios, adjacent land use and sensitive receptors, and potential groundwater receptors.
- Evaluation of a minimum of three active remedial alternatives including discussion of feasibility and limitations for each remedial alternative.
- Detailed description of proposed remediation including confirmation sampling and monitoring during implementation.
- 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 ACEH review. Upon ACEH approval of a Draft CAP, ACEH 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. Public comments on the proposed remediation will be accepted for a 30-day period.

2. **Groundwater Monitoring.** Please continue groundwater monitoring on a semi-annual basis and present the results in the groundwater monitoring reports requested below

TECHNICAL REPORT REQUEST

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

- **October 12, 2010** –Draft Corrective Action Plan
- **30 days following end of quarter** – Semi-annual Groundwater Monitoring Report

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Attachment: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

Mr. Ian Robb
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cc: Danielle Stefani, Livermore Pleasanton Fire Department, 3560 Nevada St, Pleasanton, CA 94566 (Sent via E-mail to: dstefani@lpfire.org)

Cheryl Dizon (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551 (Sent via E-mail to: cdizon@zone7water.com)

Kiersten Hoey, Conestoga-Rovers & Associates, 5900 Hollis Street, Suite A, Emeryville, CA 94608 (Sent via E-mail to: khoey@croworld.com)

Donna Drogos, ACEH (Sent via E-mail to: donna.drogos@acgov.org)
Jerry Wickham, ACEH
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.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 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)	ISSUE DATE: July 5, 2005
	REVISION DATE: July 8, 2010
	PREVIOUS REVISIONS: December 16, 2005, October 31, 2005
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

- 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 Teena Le Khan.
 - 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 Page on upper right side of browser, 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 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.