

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



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

December 21, 2007

Mr. Ian Robb  
Chevron Environmental Management Company  
6001 Bollinger Canyon Rd., K2256  
San Ramon, CA 94583-2324

Environmental Manager  
Southland Corporation  
P.O. Box 711  
Dallas, TX 75211

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

Dear Mr. Robb:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site, including the recently submitted document entitled, "Subsurface Investigation Report," dated December 19, 2007. The report presents the results from three cone penetration test (CPT) soil borings. Soil and depth-discrete grab groundwater samples were collected from each of the three CPT borings. A total of six CPT soil borings were proposed for the investigation but three off-site CPT borings were not advanced due to access issues. Total petroleum hydrocarbons as gasoline (TPHg) and benzene were detected in groundwater at maximum concentrations of 160,000 and 4,200 micrograms per liter ( $\mu\text{g/L}$ ), respectively.

The Subsurface Investigation Report indicates that proposed borings CPT-4 and CPT-5 will be advanced as soon as access issues are resolved and requests that proposed boring CPT-3 be eliminated due to potential safety issues associated with working in Springtown Boulevard. In order to address the concern with working in Springtown Boulevard, we request that CPT-3 be advanced in an off-site location that is further downgradient of the site as shown on Attachment 1- Sampling Locations for CPT Borings.

Boring locations CPT-1 and CPT-2 are generally further west than originally proposed. In order to evaluate the extent of contamination in the eastern portion of the site, we request that an additional boring, CPT-7, be advanced at the location shown on Attachment 1. For borings CPT-3 and CPT-7, please use the existing sampling protocols discussed in the, "Site Investigation Work Plan," dated April 18, 2007 and the technical comments in our May 3, 2007 correspondence for off-site and on-site CPT borings, respectively.

We request that you perform the proposed work and send us the reports described below.

### TECHNICAL REPORT REQUEST

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

- **May 9, 2008** – Subsurface Investigation 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.

### ELECTRONIC SUBMITTAL OF REPORTS

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

### 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.

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**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**

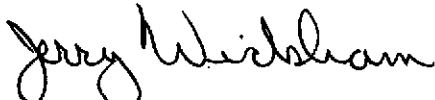
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

**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.

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

Sincerely,



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

Attachment: Sampling Locations for CPT Borings

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

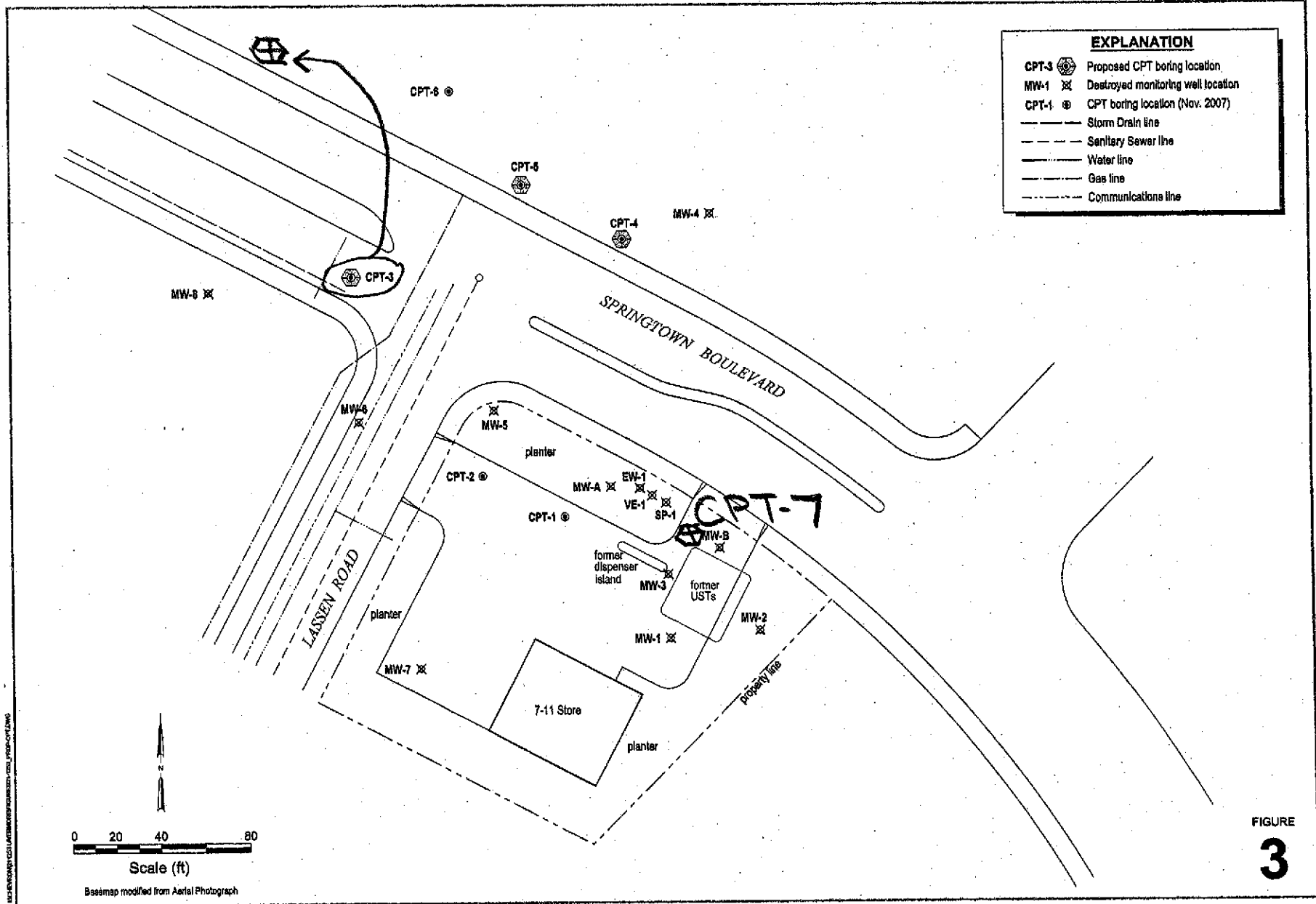
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cc: Cheryl Dizon, QIC 80201  
Zone 7 Water Agency  
100 North Canyons Parkway  
Livermore, CA 94551

Danielle Stefani  
Livermore-Pleasanton Fire Department  
3560 Nevada Street  
Pleasanton, CA 94566

Robert Foss  
Conestoga-Rovers & Associates  
5900 Hollis Street, Suite A  
Emeryville, CA 94608

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File



Site Plan with Proposed CPT Locations



CONESTOGA-FLOWERS & ASSOCIATES

Former Texaco Service Station #21-1253  
 930 Springtown Boulevard  
 Livermore, California

Attachment 1 - Sampling Locations For CPT Borings