



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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April 10, 2009

Mr. Ian Robb
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: 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, "*Work Plan for Monitoring Well Installation*," dated February 26, 2009 (Work Plan). In correspondence dated December 4, 2008, ACEH requested that you prepare a Pilot Test Work Plan or Draft Corrective Action Plan to initiate site cleanup. The February 26, 2009 Work Plan, which was prepared on Chevron's behalf by Conestoga-Rovers & Associates, proposes installation of six monitoring wells and sampling of the wells for four quarters prior to considering site cleanup. The proposal to install monitoring wells at the site is generally acceptable; however, we do not concur with the proposal to sample the wells for four quarters before considering site cleanup.

The monitoring wells are generally proposed at locations where previous borings have been advanced to characterize the site stratigraphy and define the extent of soil and groundwater contamination. The hydraulic gradient and range of seasonal water level fluctuations are known from previous monitoring wells at the site and data from nearby sites. Therefore, the proposed monitoring wells will provide only limited new information, which does not justify delaying site cleanup for four quarters. We request that you submit the previously requested Pilot Test Work Plan or Draft Corrective Action Plan **no later than June 19, 2009**.

Installation of the proposed monitoring wells may be implemented at this time provided that the technical comments below are incorporated during well installation. We request that you address the following technical comments, perform the proposed work, and send us the reports requested below.

TECHNICAL COMMENTS

1. **Well Locations.** The proposed well locations are generally acceptable; however, we request that the proposed wells adjacent to CPT-1 and CPT-7 be moved short distances to locations that are more likely to be within the interior of the plume based on the locations of the former USTs and dispensers and the hydraulic gradient. We request that the proposed wells adjacent to CPT-1 be moved to locations immediately north of CPT-1 and the proposed wells adjacent to CPT-7 be moved to locations immediately south of CPT-7. The proposed well locations in the planter area and adjacent to CPT-3 are acceptable. However, please see the requested modifications and additional wells requested in technical comment 3.
2. **Proposed Depths of Well Screens.** Since 5 of the 6 proposed wells are in locations adjacent to CPT borings, we have compared the proposed depths of the well screen intervals to the CPT logs. Based on this comparison, we request the following modifications:

Proposed Well and Well Screen Interval	Requested Well Screen Interval
Shallow well adjacent to CPT-1: 5-15 feet bgs	No change.
Deeper well adjacent to CPT-1: 25-30 feet bgs	Install well screen within sand where highest concentration of TPH and BTEX was detected from 22-27 feet bgs. We also request that a third well be installed at this location with a screen interval from 32 to 37 feet bgs to monitor a lower sand layer where elevated concentrations of TPH and BTEX were detected in a grab groundwater sample from CPT-1.
Shallow well adjacent to CPT-7: 5-15 feet bgs	No change.
Deeper well adjacent to CPT-7: 25-30 feet bgs	No sand layer is present in CPT-7 log near depths of 25-30 feet bgs. We request that the well be screened in a lower sand layer observed on CPT-7 log from 42-47 feet bgs.
Shallow well in planter area north of CPT-1: 5-15 feet bgs.	No change.
Planter Area north of CPT-1: no deeper wells proposed	We request that an additional well with a screen interval from 22-27 feet bgs be installed within the Planter Area.
Shallow well adjacent to CPT-3: 5-20 feet bgs	We request that the well be screened within sand layer from 25-30 feet bgs.

Please present the results of the well installation in the Monitoring Well Installation Report requested below.

3. **Proposed Soil Sampling.** The Work Plan proposes collection of soil samples for laboratory analysis at 5-foot intervals, obvious changes in soils, and where hydrocarbon staining or odors are observed to the bottoms of the borings. Since the proposed wells are generally adjacent to previous boring locations where soil samples have already been collected at 5-

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foot intervals using these criteria, we do not concur with the proposed soil sample collection. Therefore, we do not request laboratory analysis of soil samples from the well borings. Please present the results of the well installation in the Monitoring Well Installation Report requested below

TECHNICAL REPORT REQUEST

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

- **June 19, 2009** – Pilot Test Work Plan or Draft Corrective Action Plan
- **August 19, 2009** – Monitoring Well Installation 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

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/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

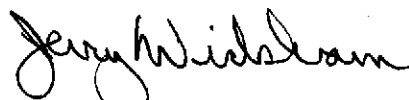
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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.

Sincerely,



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

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

Charlotte Evans, Conestoga-Rovers & Associates, 5900 Hollis Street, Suite A,
Emeryville, CA 94608

Donna Drogos, ACEH
Jerry Wickham, 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

ACTION: 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)