



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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September 5, 2012

Ms. Roya Kambin  
Chevron Environmental Management Company  
6101 Bollinger Canyon Road, 5<sup>th</sup> Floor  
San Ramon, CA 94583-5186  
(Sent via E-mail to: [RKLG@chevron.com](mailto:RKLG@chevron.com))

Mr. Jose Rios  
Environmental Services  
7-Eleven, Inc.  
One Arts Plaza, 1722 Routh St., Suite 1000  
Dallas, TX 75201  
(Sent via E-mail to: [jose.rios@7-11.com](mailto:jose.rios@7-11.com))

Subject: Review of Draft Feasibility Study and Corrective Action Plan for Fuel Leak Case No. RO0000189 and GeoTracker Global ID T0600101353, Chevron #21-1253/Texaco, 930 Springtown Boulevard, Livermore, CA 94550

Dear Ms. Kambin and Mr. Hilliard:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site, including the documents entitled, "*Draft Feasibility Study and Corrective Action Plan*," dated July 3, 2012 (FS/CAP) and "*Second Quarter 2012 Groundwater Monitoring and Sampling Report*," dated June 19, 2012. The FS/CAP, which was prepared on Chevron's behalf by Conestoga-Rovers & Associates, reviewed four remedial alternatives. Of the four remedial alternatives evaluated, surfactant-enhanced LNAPL recovery and air sparging /soil vapor extraction (AS/SVE) were the two methods that were considered viable by the FS/CAP.

The FS/CAP proposes the use of surfactant-enhanced LNAPL recovery to remove NAPL from well MW-14. The proposed use of surfactant-enhanced LNAPL recovery in the manner proposed is not approved as a remedy for the site. In two previous directives (August 30, 2010 and December 29, 2010), ACEH has described the reasons that spot treatment in well MW-14 has limited usefulness for overall site remediation. Well MW-14 is screened within the shallow zone between depths of 5 to 15 feet bgs. Site contamination extends well below the bottom of well MW-14 to depths greater than 50 feet bgs. The highest dissolved concentrations are typically detected in the intermediate zone in wells that are screened below 30 feet bgs. As we have previously stated, the addition and recovery of surfactant to well MW-14 with the objective of preventing NAPL recurrence in well MW-14 is not an adequate scope for site remediation.

The FS/CAP considers surfactant-enhanced NAPL recovery and AS/SVE to have an equal likelihood for success to reduce contaminant mass in order for monitored natural attenuation to proceed at an acceptable rate. This seems improbable given the significantly different potentials for mass removal of the two alternatives. The surfactant-enhance recovery is limited to the uppermost zone of contamination in the immediate area of well MW-14. The available mass that potentially could be removed by this method is limited. An AS/SVE alternative would presumably treat a wider area and a larger vertical interval of the aquifer. The potential for reducing mass in

order for monitored natural attenuation to proceed at an acceptable rate appears to be much greater using AS/SVE. Therefore, AS/SVE would appear to be a more appropriate preferred alternative.

However, we do not object to the use of surfactant-enhanced recovery in a pilot test as an interim step to potentially remove NAPL prior to implementation of AS/SVE. In order for surfactant-enhanced recovery to be suitably evaluated in a pilot test, the scope of the proposed action would need to be expanded beyond well MW-14. Surfactant enhanced recovery may be acceptable as a pilot test prior to implementation of AS/SVE under the following expanded conditions:

- Installation of additional wells to monitor the effectiveness of the surfactant-enhanced recovery.
- Detailed spatial and temporal monitoring to evaluate the extent of outward migration of NAPL from the area and screen interval of well MW-14.
- Detailed estimations regarding the rate and volume of both injection and recovery.

To proceed with a pilot test using surfactant-enhanced recovery, please submit a Pilot Test Work Plan that addresses the comments in the three bullets listed above. A Pilot Test Work Plan similar to previous surfactant-enhanced recovery work plans that does not include adequate monitoring will be rejected. In the Pilot Test Work Plan, please include plans for longer term groundwater monitoring that incorporate the schedule for the surfactant-enhanced recovery pilot test.

#### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACEH ftp site (Attention: Jerry Wickham), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **November 5, 2012** – Pilot Test Work Plan  
File to be named: WP\_R\_yyyy-mm-dd RO189
- **30 days following end of each quarter** – Groundwater Monitoring Reports  
File to be named: WP\_R\_yyyy-mm-dd RO3079

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.

Responsible Parties  
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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). Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

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

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

Colleen Winey (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551 (Sent via E-mail to: [cwiney@zone7water.com](mailto:cwiney@zone7water.com))

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

Donna Drogos, ACEH (Sent via E-mail to: [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org))  
Jerry Wickham, ACEH (Sent via E-mail to: [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org))

GeoTracker, eFile

## Attachment 1

### Responsible Party(ies) Legal Requirements/Obligations

#### REPORT/DATA REQUESTS

These reports/data are being requested pursuant to Division 7 of the California Water Code (Water Quality), Chapter 6.7 of Division 20 of the California Health and Safety Code (Underground Storage of Hazardous Substances), and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations (Underground Storage Tank Regulations).

#### ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (Local Oversight Program [LOP] for unauthorized releases from petroleum Underground Storage Tanks [USTs], and Site Cleanup Program [SCP] for unauthorized releases of non-petroleum hazardous substances) require submission of reports in electronic format pursuant to Chapter 3 of Division 7, Sections 13195 and 13197.5 of the California Water Code, and Chapter 30, Articles 1 and 2, Sections 3890 to 3895 of Division 3 of Title 23 of the California Code of Regulations (23 CCR). Instructions for submission of electronic documents to the ACEH FTP site are provided on the attached "Electronic Report Upload Instructions."

Submission of reports to the ACEH FTP site is in addition to requirements for electronic submittal of information (ESI) to the State Water Resources Control Board's (SWRCB) Geotracker website. In April 2001, the SWRCB adopted 23 CCR, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1 (Electronic Submission of Laboratory Data for UST Reports). Article 12 required electronic submittal of analytical laboratory data submitted in a report to a regulatory agency (effective September 1, 2001), and surveyed locations (latitude, longitude and elevation) of groundwater monitoring wells (effective January 1, 2002) in Electronic Deliverable Format (EDF) to Geotracker. Article 12 was subsequently repealed in 2004 and replaced with Article 30 (Electronic Submittal of Information) which expanded the ESI requirements to include electronic submittal of any report or data required by a regulatory agency from a cleanup site. The expanded ESI submittal requirements for petroleum UST sites subject to the requirements of 23 CCR, Division, 3, Chapter 16, Article 11, became effective December 16, 2004. All other electronic submittals required pursuant to Chapter 30 became effective January 1, 2005. Please visit the SWRCB website for more information on these requirements. ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](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, 7835, 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, late 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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> July 25, 2012
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (petroleum UST and SCP) 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 [.loptoxic@acgov.org](mailto:.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 <://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 [.loptoxic@acgov.org](mailto:.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.