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By Alameda County Environmental Health at 2:03 pm, Jun 18, 2014

Atlantic Richfield Company

Chuck Carmel

Remediation Management Project Manager

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June 15, 2014

Re: Case Closure Request Addendum
Atlantic Richfield Company Station #2162
15135 Hesperian Boulevard, San Leandro, California
ACEH Case #RO0000190

I declare that to the best of my knowledge at the present time, that the information and/or recommendations contained in the attached document are true and correct.

Submitted by,



Chuck Carmel
Remediation Management Project Manager

Attachment



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CREATING SOLUTIONS. BUILDING TRUST.

June 15, 2014

Project No. 09-88-601

Atlantic Richfield Company
P.O. Box 1257
San Ramon, CA 94583
Submitted via ENFOS

Attn.: Mr. Chuck Carmel

Re: Case Closure Request Addendum, Atlantic Richfield Company Station No.2162, 15135 Hesperian Boulevard, San Leandro, California ACEH Case No. RO0000190

Dear Mr. Carmel

Broadbent & Associates, Inc. (Broadbent) is pleased to submit this *Case Closure Request Addendum* (Closure Addendum) for the Atlantic Richfield Oil Company Station No.2162 located at 15135 Hesperian Boulevard, San Leandro, California (Site). The preceding document entitled *Soil and Groundwater Investigation Report, Updated Conceptual Site Model, and Request for Closure* (Report and Closure Request) was submitted on March 28, 2014. The ACEH responded to this Report and Closure Request with an email dated May 27, 2014. This ACEH email requested additional well survey information be provided. As a follow up to this email, BP, Broadbent and the ACEH attended a meeting regarding the additional well survey requirements on June 6, 2014. During this meeting it was determined by the ACEH that only an additional drawing is necessary which estimates the extent of methyl tert butyl ether (MTBE) in the direction of soil boring SB-1, where MTBE at 15 micrograms per liter ($\mu\text{g}/\text{L}$) were detected in groundwater during a recent investigation. This estimation is to be based on the distance of boring SB-1 from well MW-6, where maximum concentrations of MTBE are currently present at the Site, and projecting the noted observed attenuation rate further downgradient past boring SB-1 to the cleanup level of 5 $\mu\text{g}/\text{L}$. An additional email from the ACEH summarizing this meeting was sent on June 6, 2014. The drawing requested has been prepared and is included as Drawing 1. Regulatory correspondence is included as Appendix A.

As is presented in the drawing, the MTBE plume is projected to terminate approximately 45 feet further south than boring SB-1. No nearby wells are located within this plume boundary. As noted in the Report and Case Closure Request, the nearest potential use well is located approximately 450 feet from the Site. Therefore, there is no threat from MTBE in groundwater to receptors.

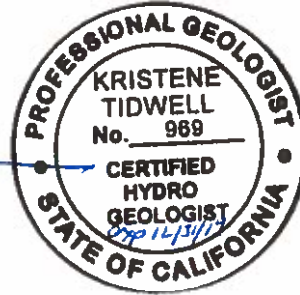
The data and Site evaluation presented in this Addendum as well as the Closure Request indicate the Site does not pose a threat to receptors or human health. We recommend that a No Further Action Letter be issued for this Site. Well decommissioning and final closure activities will be coordinated upon concurrence with the Closure Request and this Addendum from the ACEH.

Should you have questions or require additional information, please do not hesitate to contact us at (707) 455-7290.

Sincerely,
BROADBENT & ASSOCIATES, INC.



Kristene Tidwell, P.G., C.H.G.
Senior Hydrogeologist

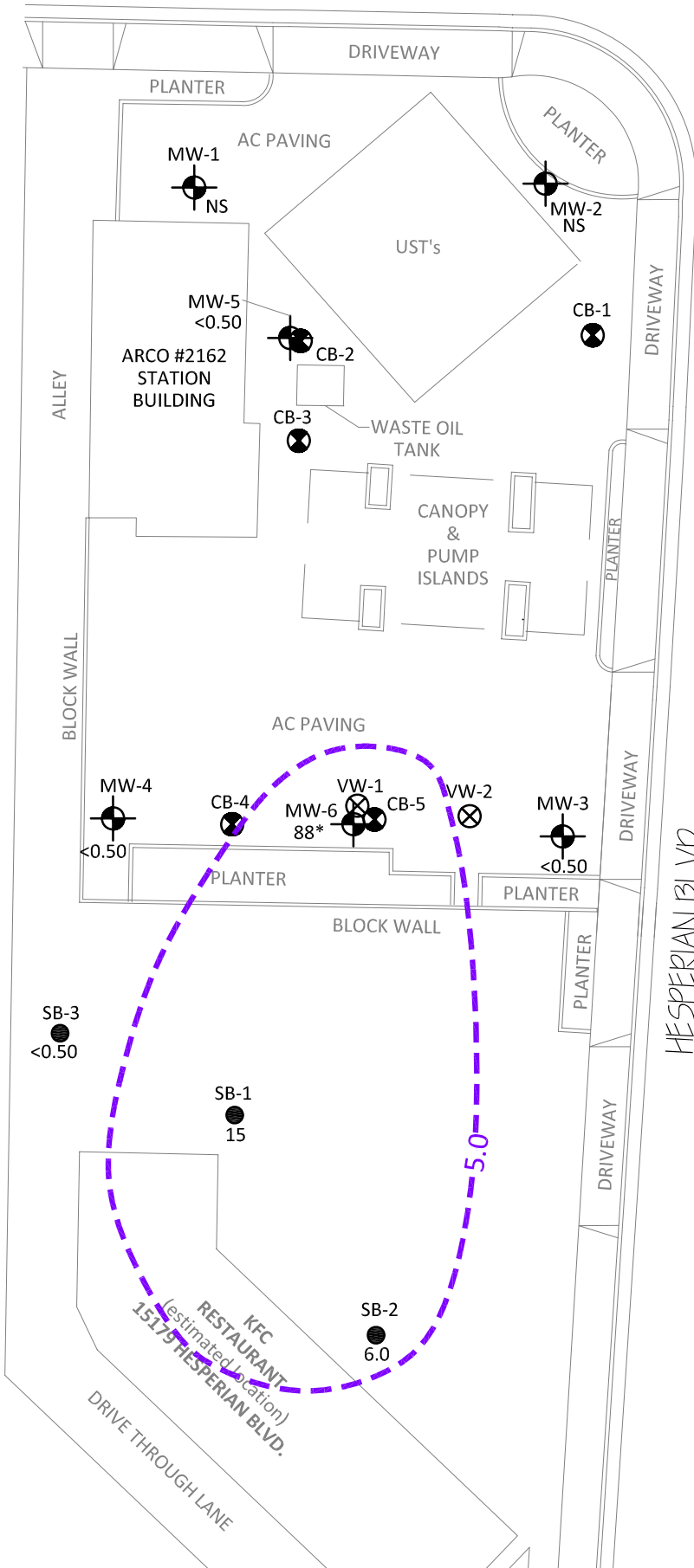


Attachment

Drawing 1 MTBE Isoconcentration Maps December 2, 2013 (Monitoring Wells) and December 23, 2013 (Soil Borings)

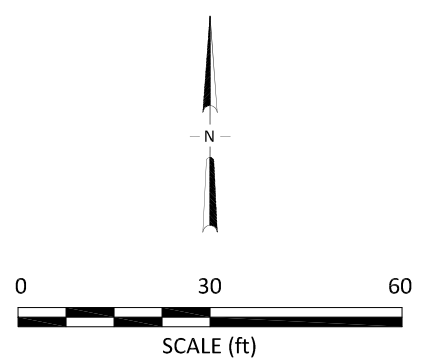
Appendix A Regulatory Correspondence

RUTH COURT



LEGEND

- Groundwater Monitoring Well Location
- Vapor Extraction Well Location
- Soil Boring Location
- Soil Boring Location (December 2013)
- NS Well Not Sampled
- * Maximum Historical Concentration-180µg/L
- MTBE Isoconcentration Contour (µg/L)



Project No.: 06-88-620 Date: 02/17/2014

Station No. 2162
15135 Hesperian Boulevard
San Leandro, California

MTBE Isoconcentration Map
December 2, 2013 (Monitoring Well)
December 23, 2013 (Soil Boring)

Drawing
1

Appendix A
Regulatory Correspondence

From: Nowell, Keith, Env. Health <Keith.Nowell@acgov.org>
Sent: Tuesday, May 27, 2014 4:57 PM
To: 'charles.carmel@bp.com'
Cc: Kristene Tidwell; Roe, Dilan, Env. Health
Subject: Fuel Leak Case RO190 - ARCO #2162, 15135 Hesperian Blvd., San Leandro, CA

Dear Mr. Carmel,

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the report entitled *Soil and Groundwater Investigation Report, Updated Conceptual Site Model and Request for Closure (RFC)*, dated March 28, 2014, prepared by Broadbent for the subject site. ACEH acknowledges the case may be a candidate for closure in the near future under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). However, based on our review ACEH disagrees that the site meets Scenario 1 of the LTCP Media Specific Groundwater criteria as the plume length exceeds 100 feet using both the source as the underground storage tank pit or the dispenser islands. Specifically, the contaminant plume length that exceeds water quality objectives is greater than 100 feet in length, the distance from the leading edge of the plume to the nearest supply well is less than 1,000 feet, and the distance from the leading edge of the plume to the nearest supply well is less than 1,000 feet.

Although a figure showing Alameda County Public Works (ACPW) well search data was provided in Appendix J of the RFC, the requisite tabular data was not included. Therefore, ACEH reviewed the data provided by ACPW and was unable to verify the location of off-site well location #10 and the irrigation well located on Upton Avenue on Appendix J Figure 2 of the RFC.

Therefore at this juncture, ACEH requests that you review the ACPW well search data presented in the figure for plotting accuracy and re-submit the figure with the report requested below. Please establish the status of wells on Upton Avenue and Nabor Street and for the well at location #10 should it be determined the well is not a monitoring well. If any of these wells are in service, please recover a water sample from the in-service well(s). Analyze the water samples for total petroleum hydrocarbons as gasoline (TPHg), benzene, toluene, ethylbenzene, xylenes (BTEX) the fuel oxygenates methyl tertiary butyl ether (MTBE), diisopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), and tertiary butyl alcohol (TBA), and the lead scavengers 1,2-dibromroethane (aka ethylene dibromide) (EDB), and 1,2-dichloroethane (aka ethylene dichloride- EDC) (or 1,2-DCA).

Present the updated figure plotting well locations, the findings presenting the status of the wells, and results of well sampling, if any by the date specified below:

Technical Report Request

Please upload technical reports to the ACEH ftp site (Attention: Keith Nowell), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **August 1, 2014– Supply Well Investigation** (file name: RO0000190_SWI_R_yyyy-mm-dd)

Thank you for your cooperation. ACEH looks forward to working with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Regards,
Keith Nowell

Keith Nowell PG, CHG
Hazardous Materials Specialist

From: Nowell, Keith, Env. Health <Keith.Nowell@acgov.org>
Sent: Friday, June 6, 2014 4:00 PM
To: 'charles.carmel@bp.com'
Cc: Kristene Tidwell; Roe, Dilan, Env. Health
Subject: Fuel Leak Case RO190 - ARCO #2162, 15135 Hesperian Blvd., San Leandro, CA
Attachments: LOP_Model closure summary 2014-03-19-Consultant Version.docx;
LandownerNotification_Form.docx

Dear Mr. Carmel,

Thank you, and Kristine Tidwell and Rob Miller, both of Broadbent & Associates (Broadbent) for meeting with Alameda County Environmental Health (ACEH) staff to discuss ACEH's Directive letter dated May 27, 2014. ACEH acknowledges the case may be a candidate for closure in the near future under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) provided concerns identified in the meeting are addressed. Based on our review of the data in the case file, it is ACEH's opinion that the case does not meet the LTCP Media Specific Groundwater criteria for distance to the nearest supply well from the plume boundary. However, ACEH believes the case may be closable under LTCP Media Specific Groundwater Scenario 5.

Therefore, at this juncture, please prepare a figure using an aerial photographic base depicting the estimated 5 micrograms per liter ($\mu\text{g/L}$) isoconcentration contour in the down gradient direction and the nearest supply wells in the down gradient direction.

As discussed in the meeting, attached is a Case Closure Summary form and a Land Owner form for completion. Please provide the completed forms via email to my attention.

Thank you for your cooperation. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Keith Nowell

Keith Nowell PG, CHG
Hazardous Materials Specialist
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PDF copies of case files can be reviewed/downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>

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