



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

September 3, 2009

Stacie H. Frerichs
Chevron Environmental Management Company
6001 Bollinger Canyon Road
San Ramon, CA 94583

T.W. Johnson
7007 San Ramon Road
Dublin, CA 94568-3239

Subject: Feasibility Study/Corrective Action Plan for Fuel Leak Case No. RO0000206 and GeoTracker Global ID T0600100354, Chevron #9-5542, 7007 San Ramon Road, Dublin, CA 94568

Dear Ms. Frerichs and Mr. Johnson:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Site Conceptual Model and Additional Investigation Work Plan," dated August 17, 2009, which was prepared by Conestoga-Rovers & Associates (CRA) for the subject site. CRA states that the former source area is adequately characterized, the groundwater contaminant plume is adequately defined, and that "no further investigation appears warranted." CRA identifies "vapor intrusion into the site building as the only remaining data gap." CRA further states that "[i]f the results of the proposed investigation indicate that there is no significant risk to human health via this pathway, preparation of a FS/CAP may not be warranted."

ACEH concurs that groundwater contaminant plume appears adequately assessed and that assessment of potential vapor intrusion at the site is warranted. However, ACEH respectfully disagrees that the former source area is adequately characterized and that a Feasibility Study/Corrective Action Plan (FS/CAP) may not be warranted. Please note that potential vapor intrusion is not the only pathway of concern that must be considered at the site. ACEH request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1. **Soil Vapor Sampling** – As mentioned above, CRA proposes to install three soil vapor wells located on the southwest, southeast and northeast corners of the Station Building at the site. Although the proposed sampling locations appear to adequately evaluate potential contaminant volatilization to indoor in the vicinity of the service station building, the proposed locations do not appear to evaluate the entire site, including in the vicinity of sidewall samples #17 and #18 where elevated concentrations of TPH-g and benzene remain in place. It is important to note that case closure consideration for the site will be based on not only the

current land use scenario, but future land use as well. Therefore, it is conceivable that a commercial structure could be constructed over areas of elevated residual hydrocarbons at the site, which are currently not adequately characterized. To adequately characterize the site, additional soil vapor sampling locations in the areas of likely impact appear justified. Please include additional vapor sampling point(s) in the vicinity of sidewall sample #17 and #18. Also, please submit a revised site figure that identifies the additional sampling point, due by the date specified below.

2. **Residual Source Area Characterization** – In our May 15, 2009 correspondence, ACEH mistakenly identified the depth of the elevated residual soil contamination in boring MW-1, which detected TPH-g and benzene at concentrations of 1,300 mg/kg and 18 mg/kg, respectively, at a depth of 30 feet bgs. CRA clarified that ACEH identified a soil sample that was collected at 25 feet bgs and that an additional soil sample was collected 30 feet bgs, which detected TPH-g and benzene at lower concentrations of 270 mg/kg and 1 mg/kg, respectively. However, significantly elevated concentrations of TPH-g (3,100 mg/kg) and benzene (60 mg/kg) were also detected in UST confirmation soil sample #18 collected at 22 feet bgs and elevated concentrations of TPH-g (1,300 mg/kg) and benzene (20 mg/kg) were also detected in soil sample #17 collected at 22 feet bgs. As stated in our May 15, 2009 correspondence, the vertical extent of contamination in the source area still appears undefined and that a significant residual source area exists on site, which appears to continue to impact and degrade the waters of this groundwater basin. Active remediation will be necessary to abate elevated soil contaminant concentrations at the site.

3. **Beneficial Uses of Groundwater** – According to the San Francisco Bay RWQCB's Water Quality Control Plan (Basin Plan) for the San Francisco Bay Basin, "[t]he Livermore-Amador Valley groundwater basin is located in the middle of the Livermore-Amador Valley in eastern Alameda County and is primarily a closed groundwater basin within the Alameda Creek Watershed with multiple groundwater sub-basins of variable water quality." The site is located within the Livermore-Amador Valley Groundwater Basin, an active groundwater basin. Also according to the Basin Plan, "the term 'groundwater' includes all subsurface waters, whether or not these waters meet the classic definition of an aquifer or occur within identified groundwater basins." It is also stated in the Basin Plan that "all groundwaters are considered suitable, or potentially suitable, for municipal or domestic water supply (MUN)." Therefore, the groundwater beneath the subject site must be considered beneficial for these uses unless shown to be non-beneficial using criteria presented in the Basin Plan.

Currently, concentrations of contaminants in groundwater are significantly above applicable Regional Water Quality Control Board's (RWQCB) Environmental Screening Levels (ESLs). Active remediation will be necessary to abate the elevated groundwater contaminant concentrations at the site.

4. **Feasibility Study/Corrective Action Plan** – As mentioned above, CRA proposes to collect vapor samples to evaluate potential contaminant volatilization to indoor air exposure pathway at the site. CRA further states that "[i]f the results of the proposed investigation indicate that there is no significant risk to human health via this pathway, preparation of a FS/CAP may not be warranted." As mentioned above, potential vapor intrusion is not the only consideration

for this site. Since the site is located within an active groundwater basin and that concentrations of contaminants at the site are significantly above applicable RWQCB's ESLs, an FS/CAP prepared in accordance with Title 23, California Code of Regulations, Section 2725 is required. The FS/CAP must include a concise background of soil and groundwater investigations performed in connection with this case and an assessment of the residual impacts of the chemicals of concern (COCs) for the site and the surrounding area where the unauthorized release has migrated or may migrate. The FS/CAP should also include, but not limited to, a detailed description of site lithology, including soil permeability, and most importantly, contamination cleanup levels and cleanup goals, in accordance with the San Francisco Regional Water Quality Control Board (SFRWQCB) Basin Plan and appropriate ESL guidance for all COCs and for the appropriate groundwater designation. Please note that soil cleanup levels should ultimately (within a reasonable timeframe) achieve water quality objectives (cleanup goals) for groundwater in accordance with the SFRWQCB Basin Plan. Please specify appropriate cleanup levels and cleanup goals in accordance with 23 CCR Section 2725, 2726, and 2727 in the FS/CAP.

The FS/CAP must evaluate at least three viable alternatives for remedying or mitigating the actual or potential adverse effects of the unauthorized release(s) besides the 'no action' and 'monitored natural attenuation' remedial alternatives. Each alternative shall be evaluated not only for cost-effectiveness but also its timeframe to reach cleanup levels and cleanup goals, and ultimately the Responsible Party must propose the most cost-effective corrective action.

NOTIFICATION OF FIELDWORK ACTIVITIES

Please schedule and complete the fieldwork activities by the date specified below and provide ACEH with at least three (3) business days notification prior to conducting the fieldwork.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Paresh Khatri), according to the following schedule:

- **September 17, 2009** – Revised Site Figure
- **December 2, 2009** – Soil and Water Investigation Report & FS/CAP
- **Due within 30 Days of Sampling** – Semi-annual Monitoring Report (3rd Quarter 2009)
- **Due within 30 Days of Sampling** – Semi-annual Monitoring Report (1st Quarter 2010)

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.

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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) 777-2478 or send me an electronic mail message at paresh.khatri@acgov.org.

Sincerely,

Paresh C. Khatri
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Brian P. Carey, Conestoga-Rovers & Associates, 2000 Opportunity Drive, Suite 110, Roseville, CA 95678
James P. Kiernan, Conestoga-Rovers & Associates, 2000 Opportunity Drive, Suite 110, Roseville, CA 95678
Cheryl Dizon (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551
Donna Drogos, ACEH (*Sent via E-mail to: donna.drogos@acgov.org*)
Paresh Khatri, ACEH (*Sent via E-mail to: paresh.khatri@acgov.org*)
GeoTracker
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: March 27, 2009
	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 My Le Huynh.
 - 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 @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.