ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
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Alameda, CA 94502-6577

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Mr. John Ratto
Ratto Land Company
P.O. Box 6104
Oakland, CA 94603-0104

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ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
REBECCA GEBHART, Interim Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY
ALAMEDA, CA 94502
(510) 567-6700
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June 7, 2017

Ms. Carryl MacLeod
Chevron Environmental Management Co.
6101 Bollinger Canyon Road
San Ramon, CA 94583
(Sent via electronic mail to:
CMacLeod@chevron.com)

Mr. John Ratto
Ratto Land Company
P.O. Box 6104
Oakland, CA 94603-0104

Ms. Vivian McIlraith
Vivian L. McIlraith Trust
407 Castello Road
Lafayette, CA 94549

Subject: Request for Work Plan Addendum, Fuel Leak Case No. RO0000233 (Global ID # T0600100333), Chevron #9-4612, 3616 San Leandro Street, Oakland, 94601

Dear Mesdames MacLeod and McIlraith, and Mr. Ratto:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file for the above referenced site including the report entitled *Site Conceptual Model and Data Gap Work Plan*, dated February 28, 2014, and the *Second Quarter 2016 Annual Groundwater Monitoring Report*, dated July 1, 2016. The reports were submitted on your behalf by Stantec Consulting Services, Inc. (Stantec). Thank you for submitting the reports.

As you will recall, the site has an atypical distribution of contamination, in that more elevated Photoionization Detector (PID) responses and odors are not at the groundwater interface at approximately 8 to 10 feet below grade surface (bgs), but at a depth of approximately 16 to 20 feet bgs. Deeper soils with elevated PID or odor responses have not been previously submitted for analytical testing. As a result of the data gap review, two downgradient soil bores were proposed in the referenced work plan in order to collect grab groundwater samples to define the extent of groundwater contamination in a deep granular layer downgradient of the subject site, and ACDEH requested several modifications to the scope of work.

Attempts to place the two proposed soil bores have been hindered by the presence of a high pressure gas line across San Leandro Street, and a lack of progress in obtaining access to private property slightly further downgradient. As you are aware, alternative means to define the potential extent of a groundwater plume are referenced in the *Technical Justification for Groundwater Media-Specific Criteria* (State Water Board, April 24, 2012). Therefore, based on the review of the case file and the referenced reports, ACDEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

1. **Work Plan Addendum** – The referenced work plan proposed a series of actions with which ACDEH is with several modifications in general agreement of undertaking; however, due to difficulty in obtaining offsite access, and potential alternative methods to move the case towards closure, ACDEH requests a work plan addendum for the site. Please submit the work plan addendum by the date specified below.

    a. ***Technical Justification for Groundwater Media-Specific Criteria*** – Provided a sensitive receptor survey, including wells, surface water bodies, basements, and other potential sensitive receptors, is conducted in conjunction with an estimate of maximum downgradient plume lengths as defined by this reference, this alternative method in defining the extent of a plume may be sufficient at the site.

    b. **Atypical Onsite Contaminant Distribution** – The placement of bores onsite, rather than offsite, to investigate the atypical distribution of PID responses reported in historic onsite soil bores, may be adequate to determine the accuracy of the data.

    c. **Incorporation of Previous Work Plan Modifications** – Incorporation of previous work plan modifications is expected to help move the site towards closure.