



ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 LOCAL OVERSIGHT PROGRAM (LOP)
 For Hazardous Materials Releases
 1131 Harbor Bay Parkway
 Alameda, CA 94502-6577

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



ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

COLLEEN CHAWLA, 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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January 29, 2018

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: Extension Request Denial and Request for Data Gap Work Plan, 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 letter response entitled *Response to Case Closure Denial and Directive for Work Plan Addendum Submittal*, dated December 7, 2017. The response was submitted on your behalf by AECOM. The response requested an extension to the due date for the Work Plan Addendum due to a pending review of the case by the State Water Resources Control Board (SWB). The extension is denied for the reasons stated below in the Technical Comment section of this letter.

Implementation of site characterization at this site is important in order to be protective of human health and the environment and to move this case towards closure. Please note that as an identified Responsible Party, you are required by California Code of Regulations (Title 23, Division 3, Chapter 16, Article 11, §2720 through §2728) to characterize the site and implement any necessary corrective action.

Based on the review of the case file ACDEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

- 1. Work Plan Request** – ACDEH recognizes that the SWB will respond to the Request for Closure denial contained in the October 6, 2017 directive letter; however, as the lead agency ACDEH has been tasked by the SWB with moving all cases to closure in a consistent and timely manner. Therefore, in the interim until the SWB responds, ACDEH reaffirms the requirement for the requested work to proceed.

ACDEH notes that arguments for the appropriate hypothetical plume length that should be used to model the potential length of the groundwater plume are provided in the letter of response referenced above. In order to eliminate assumption errors, ACDEH requests the generation of a Data Gap Work Plan to delineate the plume in the field, and in an effort to limit the number of mobilizations, requests the inclusion of any other data gaps identified in AECOMs review of the case.

The identification of potential sensitive receptors within 1,000 feet of the confirmed plume is also requested. This is requested to include sensitive populations and wells, as well as basements and other dewatering structures due to the potential that these constructs may discharge contaminated groundwater to city streets as non-point source contamination, and to determine the risk for vapor intrusion into the downgradient subgrade structures due to the removal of a large portion of the separation distance from the surface to groundwater.

ACDEH requests the identified wells, sensitive populations, basements and other dewatering structures be located on a scaled figure incorporating an aerial photograph, with relevant data provided on a table similar to the depiction in Attachment 2, which is for a hypothetical plume.