

Nowell, Keith, Env. Health

To: TimBishop@chevron.com
Cc: jim.harms@aecom.com; AFischer@Chevron.com; Roe, Dilan, Env. Health
Subject: Fuel Leak Case RO253 Unocal #5781, 3535 Pierson St., Oakland

Dear Mr. Bishop,

Thank you, Jim Harms of AECOM, and Alexis Fischer of Chevron Environmental Management Company (Chevron) for participating in the meeting on January 30, 2014 regarding fuel leak case for Unocal #5781, 3535 Pierson Street, Oakland, Alameda County Environmental Health (ACEH) case number RO0000253. The purpose of the meeting was to discuss the status of the case and identify action items to move the case forward toward closure. ACEH acknowledged 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 regarding the direction of groundwater flow, contaminant plume length, and the scope of analytes in previous site investigations are addressed.

Therefore at this juncture, please address the following technical comments and submit the requested document by the date specified below:

Technical Comments

- Groundwater Flow Direction – The groundwater flow direction varies widely, from northeasterly, southeasterly, to west-northwesterly. Please provide an explanation of the radical shifts observed in groundwater flow.
- Contaminant Plume Length – Based on the variable direction of groundwater flow, it is unclear to ACEH that the contaminant plume has been delineated for all flow directions.
- Scope of Analysis – During this past year diesel concentrations at the site have been reported up to 22,000 micrograms per liter ($\mu\text{g/L}$). However, diesel has not always been an analyte for site investigations, including the 1989-1990 investigation associated with the removal of the fuel underground storage tanks (USTs). Total oil and grease (TOG) has been reported at concentrations up to 17,000 milligrams per kilogram (mg/kg). Semi-volatile organic compounds (SVOCs) were not analyzed during the 1990 waste oil UST investigation even though visual and analytical evidence indicated the tank leaked. Please add all appropriate analytes to the scope of analysis for all future investigations.

As discussed in the meeting please prepare a focused site conceptual model (SCM) and data gap investigation work plan to address the technical comments above. In order to expedite review, ACEH requests the SCM be presented in a tabular format that highlights the major SCM elements and associated data gaps, which need to be addressed to progress the site to case closure under the LTCP. Please sequence activities in the proposed Data Gap Investigation scope of work to enable efficient data collection in the fewest mobilizations possible.

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:

- **February 28, 2014 – Focused Site Conceptual Model and Data Gap Investigation Work Plan** (file name: RO0000253_SCM_R_YYYY-MM-DD)

Thank you for your cooperation. ACEH looks forward to working with you and your consultant 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.

Respectfully,

Keith Nowell

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