

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
ALEX BRISCOE, Director



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

November 19, 2010

Mr. Dave Patten
Chevron Corporation
6111 Bollinger Canyon Rd, BR-Y-3608
San Ramon, CA 94583
(sent via electronic mail to DRPatten@chevron.com)

Mr. Howard Perera
340 Highland Drive
Piedmont, CA 94611

Mr. Ravi Randhawa
5501 San Antonio
Pleasanton, CA 94566

Mr. John Robinson
Hoffman Investment Company
1035 Edwards Road
Burlingame, CA 94010

Mr. Jeff Orwig
66 Ambleside Court
Danville, CA 94526

Mr. Fred Manchouri
1065 Shuey Drive
Moraga, CA 94556

Mr. Mir Ghafari
68 Bates Blvd.
Orinda, CA 94563

Subject: Request for Additional Information Report; Fuel Leak Case No. RO0000269; (Global ID # T0600101885); Chevron #9-0329, 340 Highland Avenue, Piedmont, CA 94611

Dear Gentlemen:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Soil and Groundwater Investigation Report*, dated August 8, 2005, the December 4, 2006 ACEH directive letter, a December 5, 2006 City of Piedmont letter, an email correspondence from Robert Foss of Cambria dated December 22, 2006, and the *First Semi-Annual 2010 Groundwater Monitoring and Sampling Report*, dated April 30, 2010. Cited documents submitted on your behalf were generated by either Cambria or Conestoga-Rovers & Associates (CRA). Based on the review of the case file it appears that pertinent site information previously requested of you has not been received, preventing a clearer understanding of the site. We request that you address the following technical comments and send us the document requested below.

TECHNICAL COMMENTS

1. **Sampling City of Piedmont Well** – Several of the referenced documents indicate intent to sample the City of Piedmont well, located at a distance of 0.11 miles from the site. The referenced December 22nd email indicates the well was expected to have been sampled prior to the January 5, 2007 deadline. The status of this action appears to remain unreported. Please update ACEH as the results of the sampling event by the date identified below.
2. **Repair of Grease Interceptor / Drain and Asphalt Paving** – The referenced City of Piedmont letter was concerned with the effectiveness of a grease interceptor / drain located at the southwestern corner of the station and the repair of asphalt paving along the sidewalk, included three color photos of the area of concern (including visible drain grating), and set deadlines for the repair work. The status of this action appears to remain unreported, including the City of Piedmont requested plans and drawings.

Review of site documents suggests repair and improvement of the grease interceptor / drain can be of importance to closure at the site. The two hand auger bore transects appear to indicate a general lack of near surface groundwater east of bore U-1 or HA-6. These bores appear to have been installed in close proximity to the grease interceptor / drain and the surfacing water depicted in the

photographs provided by the City. Based on the elevated results of grab groundwater samples collected in hand auger bores HA-1 to HA-5, the exceptionally shallow depth that these samples were collected at (0.5 to 1.5 feet below surface grade), and the lack of collectable groundwater east of bores U-1 and HA-6 in a generally wetter period of the year (March and October, respectively), it would be reasonable to assume that the surfacing water contained petroleum hydrocarbons at similar concentrations, and that the groundwater / surfacing water utilizes the drain in part as a preferential conduit (despite several attempts to collect samples along conduits). Alternatively the surfacing water may entirely surface to become a non-point source concern to the local creek. Because similar groundwater concentrations were documented in well C-2 in the recent September 2, 2010 monitoring event, it is reasonable to assume these general conditions remain if they have not been corrected.

By the date identified below please update ACEH as to the status of a repair or improvement of the interceptor / drain, or to the status of permanent management and control of a potential non-point source. Please also update or otherwise clarify existing utility maps such that all utilities are clearly depicted, that all utility depths are clearly depicted and documented, and investigate where utilities may discharge (especially storm drain).

TECHNICAL REPORT REQUEST

Please submit the following deliverable to ACEH (Attention: Mark Detterman), according to the following schedule:

- **January 31, 2011** – Additional Information Report

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.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark E. Detterman, PG, CEG
Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations
Electronic Report Upload (ftp) Instructions

cc: Nathan Lee, Conestoga-Rovers & Associates, 5900 Hollis Street, Suite A, Emeryville, CA 94608;
(sent via electronic mail to NLee@CRAworld.com)

Donna Drogos, ACEH, (sent via electronic mail to donna.drogos@acgov.org)
Mark Detterman, ACEH, (sent via electronic mail to mark.detterman@acgov.org)
Geotracker, e-File

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

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.

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
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

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- 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)

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
 - 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, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - 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.