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Marketing Business Unit

**Chevron Environmental
Management Company**
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markhorne@chevron.com

Alameda County Environmental Health (ACEH)
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Re: Former Chevron Service Station No. 93322
7225 Bancroft Avenue
Oakland, CA

RECEIVED

By Alameda County Environmental Health 11:38 am, Dec 16, 2016

I have reviewed the attached report titled *Response to Regulatory Letter Dated October 19, 2016*.

The information in this report is accurate to the best of my knowledge and all local Agency/Regional Board guidelines have been followed. This report was prepared by GHD Services Inc., upon whose assistance and advice I have relied.

This letter is submitted pursuant to the requirements of California Water Code Section 13267(b)(1) and the regulating implementation entitled Appendix A pertaining thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Sincerely,

A handwritten signature in blue ink that reads "Mark E. Horne".

Mark Horne
Project Manager

Attachment: *Response to Regulatory Letter Dated October 19, 2016*



December 14, 2016

Reference No. 311806

Mr. Mark Detterman
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

**Re: Response to Regulatory Letter Dated October 19, 2016
Former Chevron Service Station 93322
7225 Bancroft Avenue
Oakland, California
Alameda County Environmental Health RO #0274**

Dear Mr. Detterman:

GHD has prepared this *Response to Regulatory Letter Dated October 19, 2016* on behalf of Chevron Environmental Management Company (EMC) for Former Chevron Service Station 93322 located at 7225 Bancroft Avenue in Oakland, California (Figures 1 and 2). In the October 19, 2016 letter (Attachment A), Alameda County Environmental Health (ACEH) requested a Feasibility Study and Corrective Action Plan (FS/CAP) to address residual hydrocarbons in soil and groundwater beneath the site. In lieu of a FS/CAP, GHD has prepared this response to the ACEH letter.

Based on the data provided in GHD's May 6, 2016 *Site Investigation Report and Updated Conceptual Site Model* (Updated CSM):

- To date, 58 soil samples have been collected between 0 and 10 fbg and none of those contain concentrations that exceed the Low-Threat Underground Storage Tank Closure Policy (LTCP) Table 1.¹ criteria for direct exposure on a commercial property, volatilization to outdoor air on a commercial property or for direct exposure risk for utility workers.
- The highest hydrocarbon concentrations are detected in saturated soil primarily between 15 and 30 fbg beneath the former central dispenser island, SB-13, and MW-1, and west of the fuel USTs (SB-12, SB-5, B-2, and SB-9).
- Dissolved hydrocarbons in groundwater are not fully delineated in the downgradient direction northwest of MW-6 or in the area around SB-9.
- With the exception of 0.09 foot of LNAPL observed in MW-1 in September 2015, no measurable LNAPL had been reported for approximately 9 years.
- Soil vapor concentrations reported in onsite vapor probes VP-1, VP-3, and VP-4 during the February 2016 sampling event do not exceed the Scenario 4 LTCP criteria for residential and

¹ State Water Control Board Resolution No. 2012-006, Low-Threat Underground Storage Tank Closure Policy (LTCP), California State Water Resources Control Board, August 17, 2012.



commercial land use, suggesting there appears to be no potential risk to the downgradient residences on the north side of the site. No sample was collected from VP-2 due to water in the tubing.

- No domestic or municipal wells were identified within 0.5-mile radius of the site.

To assess dissolved hydrocarbons downgradient of well MW-6 and in the area of SB-9, GHD is currently permitting the installation of two monitoring wells as proposed in the May 6, 2016 Updated SCM and approved by ACEH (Attachment A). Additionally, soil vapor samples will be collected from the existing four soil vapor probes, concurrently with well installations, to verify current soil vapor conditions.

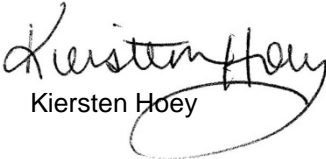
To address any residual light non-aqueous phase liquid (LNAPL) around well MW-1, an absorbent sock will be installed in well MW-1 during the fourth quarter 2016 groundwater monitoring and sampling event and removed and replaced during each subsequent quarterly monitoring and sampling event. This interim remediation action was approved by ACEH in their October 28, 2016 letter (Attachment A).

Considering the lack of immediate risk to human health and the environment, it appears to be justified to submit the FS/CAP following the collection of additional data that may affect the current CSM. Therefore, after the additional wells have been installed and soil vapor samples have been collected, GHD and Chevron will evaluate the new data collected, update the CSM, and submit a FS/CAP with the Site Assessment Report.

We appreciate the opportunity to work with you on this project. Please contact Kiersten Hoey (510) 420-3347 if you have any questions or require additional information.

Cordially,

GHD


Kiersten Hoey


Brandon S. Wilken, PG 7564



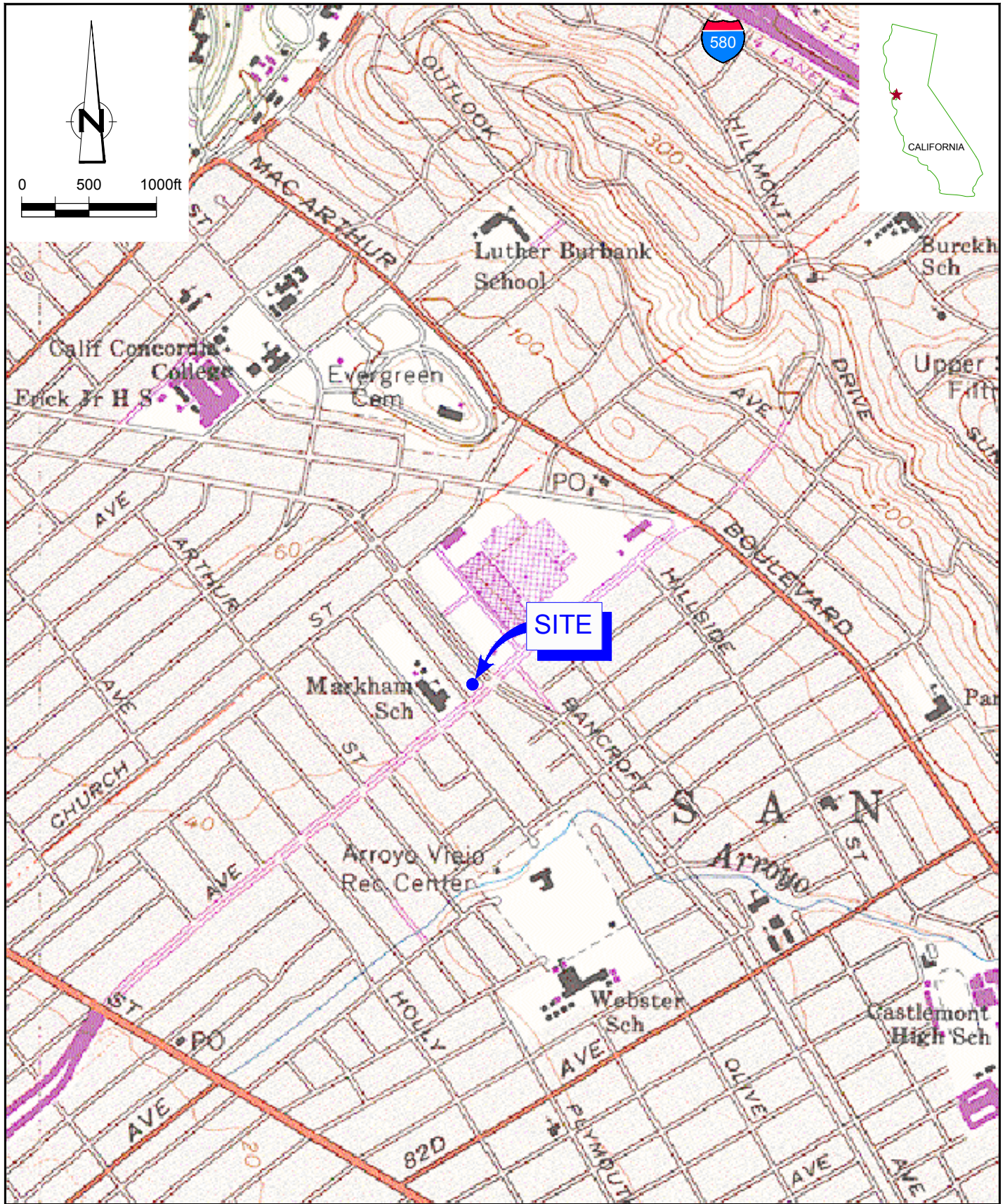
KH/cw/36
Encl.

Figure 1 Vicinity Map
Figure 2 Site Plan

Attachment A Regulatory Letter

cc: Mr. Mark Horne, Chevron EMC (*electronic copy*)

Figures



SOURCE: TOPO! MAPS



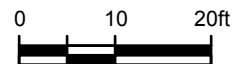
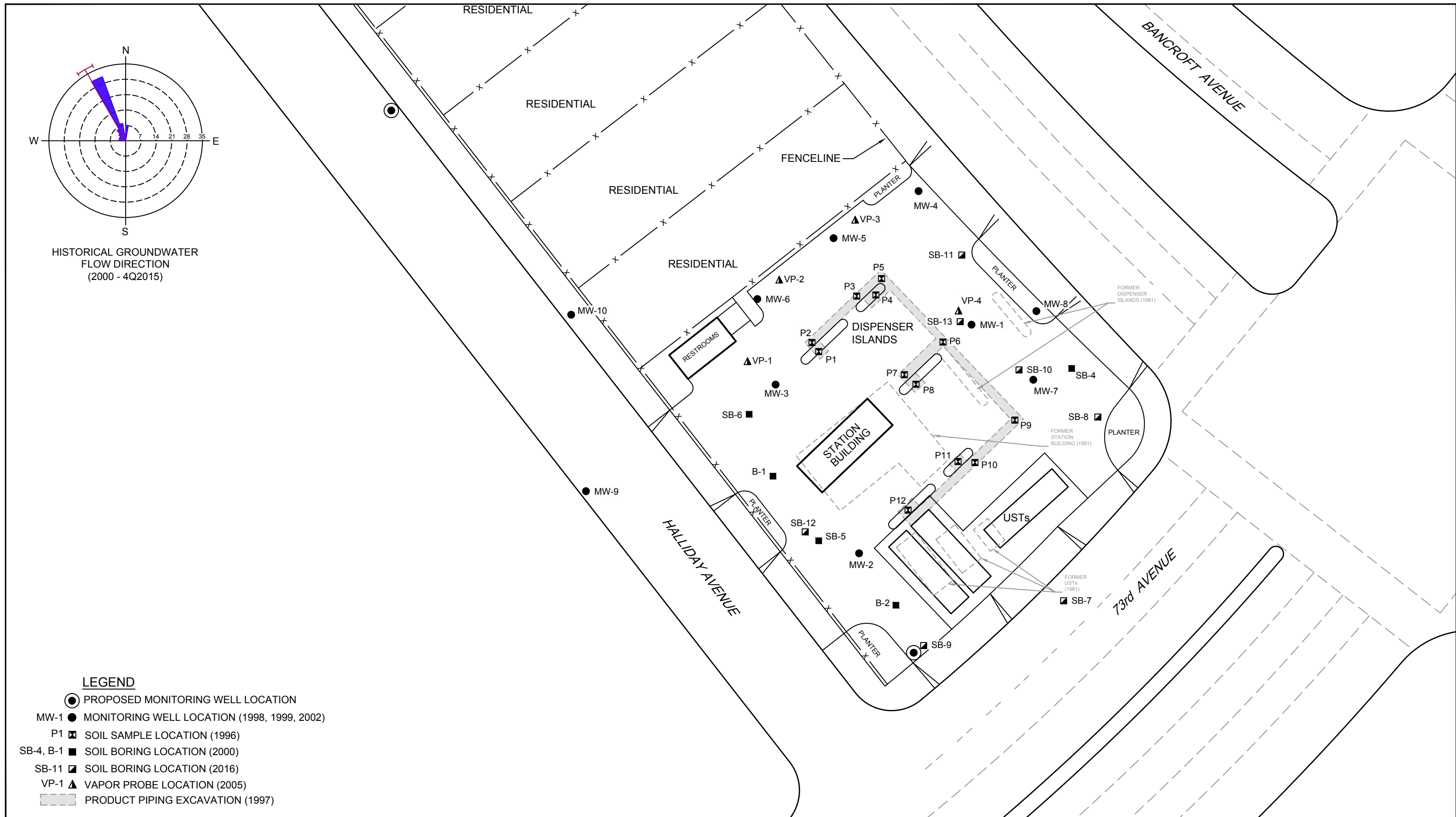
FORMER CHEVRON SERVICE STATION 93322
 7225 BANCROFT AVENUE
 OAKLAND, CALIFORNIA

311806-2016.3

Dec 1, 2016

VICINITY MAP

FIGURE 1



FORMER CHEVRON SERVICE STATION 93322
 7225 BANCROFT AVENUE
 OAKLAND, CALIFORNIA

SITE PLAN

311806-2016.3
 Nov 30, 2016

FIGURE 2

Attachment A Regulatory Letter

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, SUITE 250
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

October 19, 2016

Mr. Mark Horne
Chevron Products Company
6101 Bollinger Canyon Road
San Ramon, CA 94583
(Sent via electronic mail to:
MHorne@chevron.com)

7225 Bancroft St LP
c/o The Najdawi 2009 Trust
5 Kingswood Circle
Hillsborough, CA 94010

Mr. Amardeep Sidhu
Malwa Petroleum Sales, LLC
Address Unknown

Mike and Dean Najdawi
Address Unknown

Subject: Interim Remedial Action Plan Approval; Fuel Leak Case No. RO0000274 and Geotracker
Global ID T0600102079, Chevron #9-3322; 7225 Bancroft Avenue, Oakland, CA 94605

Dear Responsible Parties:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *Second Quarter 2016 Groundwater Monitoring and Sampling Report*, dated August 17, 2016, and the *Interim Remedial Action Plan (IRAP)*, dated August 26 2016. The reports were prepared and submitted on your behalf by GHD Services, Inc (GHD). Thank you for submitting the reports.

Based on ACDEH staff review of the *Interim Remedial Action Plan*, the proposed scope of work is approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- 1. Interim Remedial Action Plan Approval** – The referenced IRAP proposes actions with which ACDEH is in general agreement of undertaking. Please submit remedial progress reports with the quarterly monitoring and sampling reports, as identified below.
- 2. Feasibility Study and Corrective Action Plan** – At this time, a Feasibility Study/Corrective Action Plan (FS/CAP) prepared in accordance with Title 23, California Code of Regulations, Section 2725 appears warranted. 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 is 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 Environmental Screening Level (ESL) guidance or the Low-Threat Closure Policy (LTCP) requirements for all COCs. Please specify appropriate cleanup levels and cleanup goals in accordance with 23 CCR Section 2725, 2726, and 2727 in the FS/CAP.

Responsible Parties

RO0000274

October 19, 2016, Page 2

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.

- 3. Public Participation** - Public participation is a requirement for the Corrective Action Plan process in order to notify potentially affected stakeholders who live or own property in the surrounding area of the proposed remediation. We request that you submit a Draft Fact Sheet for ACDEH review. Upon ACDEH approval of a Draft Fact Sheet, we will request that you send the Fact Sheet to an address list provided by ACDEH. Public comments on the proposed remediation will be accepted for a 30-day period. Following the end of the public comment period, any comments received including ACDEH's comments described below, must be addressed and incorporated into a Final CAP.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below, according to the following schedule:

- **November 18, 2016** – Third Quarter 2016 Groundwater Monitoring Report
File to be named: RO274_GWM_R_yyyy-mm-dd
- **December 16, 2016** – Feasibility Study / Corrective Action Plan
File to be named: RO274_FEASSTUD_CAP_R_yyyy-mm-dd
- **February 17, 2017** – Fourth Quarter 2016 Groundwater Monitoring Report
File to be named: RO274_GWM_R_yyyy-mm-dd

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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

If your email address is not listed on the first page of this letter, ACDEH is requesting your email address to help expedite communications and to help lower overall costs. Please provide that information in your next submittal.

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

Sincerely,



Digitally signed by Mark Detterman
DN: cn=Mark Detterman, o=ACEH, ou=ACEH,
email=mark.detterman@acgov.org, c=US
Date: 2016.10.19 17:22:13 -07'00'

Mark E. Detterman, P.G., C.E.G.
Senior Hazardous Materials Specialist

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

cc: Kiersten Hoey, GHD Services, Inc, 5900 Hollis Street, Suite A, Emeryville, CA 94608; (Sent via electronic mail to: kiersten.hoey@ghd.com)

Responsible Parties

RO0000274

October 19, 2016, Page 3

Dilan Roe, ACDEH, (Sent via electronic mail to: dilan.roe@acgov.org)

Paresh Khatri, ACDEH, (Sent via electronic mail to: paresh.khatri@acgov.org)

Mark Detterman, ACDEH, (Sent via electronic mail to: mark.detterman@acgov.org)

Electronic file, GeoTracker

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.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

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: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 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 deh.loptoxic@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 deh.loptoxic@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.