ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
ALEX BRISCOE, Agency Director

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

December 1, 2014

Ms. Alexis Fischer
Chevron Products Company
6101 Bollinger Canyon Road
San Ramon, CA 94583
(sent via electronic mail to AFischer@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: Request for a Work Plan Addendum; Fuel Leak Case No. RO0000274 and Geotracker Global ID T0600102079, Chevron #9-3322; 7225 Bancroft Avenue, Oakland, CA 94605

Dear Responsible Parties:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Second Quarter 2014 Groundwater Monitoring and Sampling Report,* dated August 8, 2014, the *Focused Site Conceptual Model and Data Gap Investigation Work Plan,* dated October 1, 2014, and the *Third Quarter 2014 Groundwater Monitoring and Sampling Report,* dated November 20, 2014. The reports were prepared and submitted on your behalf by Conestoga-Rovers & Associates (CRA). Thank you for submitting the reports.

ACEH has previously evaluated site data to determine if the site was eligible for closure as a low risk site under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on the previous review ACEH determined that the site failed to meet the LTCP General Criteria d (free product removed to extent practicable), e (Site Conceptual Model), f (secondary source removed to the extent practicable), the Media-Specific Criteria for Groundwater, and the Media-Specific Criteria for Vapor Intrusion to Indoor Air.

To incorporate data contained in the referenced documents ACEH has reevaluated the case and has determined that the case currently fails Criteria d (free product removed to extent practicable), the Media-Specific Criteria for Groundwater, and the Media-Specific Criteria for Vapor Intrusion to Indoor Air (see Geotracker for a copy of the LTCP checklist).

Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below.

TECHNICAL COMMENTS

1. **Work Plan Addendum Request –** ACEH has reviewed the SCM and Data Gap Investigation Work Plan, and while in general agreement with the proposed work, requests the submittal of a revised Figure 18 (as a work plan addendum) in order to incorporate the following additionally requested items:

a. Request for Additional Soil Bores and Grab Groundwater Samples – ACEH is in general agreement with the installation of five soil bores at the subject site; however, requests the installation of additional soil bores as follows:

- **MW-8 to MW-4 Gap –** ACEH remains concerned that the extent of surfactant mobilized Light Non-Aqueous Phase Liquid (LNAPL) has not been adequately defined at the site (See also Technical Comment 2 below). While recognizing presence of low groundwater concentrations in wells MW-8 and MW-4 along the eastern boundary of the site, the presence of an approximately 60 foot gap between the wells in course-grained water-bearing units allows sufficient opportunity for a potential natural, or possible man-made, preferential pathway to exist along the eastern boundary. Consequently ACEH requests the addition of a minimum of one soil bore between wells MW-8 and MW-4 in order to collect soil and a grab groundwater sample at the approximate mid-point in the gap between these two wells.
- **Waste Oil UST –** A former waste oil UST is reported to have been installed on the eastern side of the former service station building at the site, and is reported to have been removed by 1981. While soil from bores SB-4 and SB-5 is documented to have been tested for naphthalene and Poly-Aromatic Hydrocarbons (PNAs), the soil bores are at least 50 feet distant from the location of the former waste oil UST. It appears appropriate to determine the approximate location of the former waste oil UST and install a minimum of one soil bore in order to determine the quality of the UST fill, if it was potentially disposed of offsite, and to collect soil samples for LTCP characterization of naphthalene and PAHs in, at a minimum, the 0 to 5 and the 5 to 10 foot intervals. Determining the vertical extent of any contamination found is also requested.
- **Southeastern Property Boundary –** In an effort to quickly assess the lateral extent of contamination in soil and groundwater at the site, ACEH additionally requests the installation of a soil bore along the southeastern property boundary along 73rd Avenue. The bore is anticipated to determine the extent contamination associated with the "soughed off elbow" (or other) may have extended towards 73rd Avenue.

b. Sensitive Receptor Survey – ACEH is in general agreement with the proposed sensitive receptor survey. In addition to a water supply well survey, please ensure that a building stock survey is conducted to determine the construction style of vicinity buildings, including if basements are present in the residential neighborhood downgradient of the site. The presence of basements eliminates the separation distance employed by the LTCP for vapor intrusion and places receptors closer to contaminated groundwater.

Please also ensure that the location and depth of utility laterals to the site are determined. Man-made utility preferential pathways can also transmit surfactant LNAPL and dissolved-phased concentrations offsite in a very narrow corridor.

c. Vapor Sampling – ACEH is in general agreement with the recommendation to conduct an additional round of soil vapor sampling of the shallow vapor wells at the site. Please ensure that the most recent Department of Toxic Substances Control (DTSC) vapor guidance is followed, including the collection of shroud tracer concentrations for a comparison to vapor samples should the tracer be detected in one or more vapor samples. DTSC guidelines allow an acceptable tracer leak percentage.

Additionally, ACEH requests, per the DTSC guidelines, that naphthalene by laboratory method TO-15 be verified with method TO-17.

d. Soil Sample Selection Protocols – The work plan proposes to collect and retain for laboratory analysis soil samples at a depth of 3 and 5 feet below grade surface (bgs), and at five foot intervals thereafter. Please ensure that soil is additionally collected in conjunction with lithology changes, photoionization detections, and other signs of contamination such as discoloration, and etc.

2. **LTCP General Criteria d (Free Product) and Request for Interim Remedial Actions –** ACEH is in disagreement with the conclusions of the referenced October 2014 SCM and work plan relative to the presence of LNAPL at the site. ACEH's review of the case files, including the referenced reports, indicates the continued presence of LNAPL at the site. The concentration of Total Petroleum Hydrocarbons as gasoline (TPHg) in well MW-1 since September 2011 has ranged from 90,000 to 280,000 micrograms per liter (µg/l). Fingerprint analysis of the hydrocarbon present at the site indicates it is an old release, principally consisting of tetraethyl-lead gasoline. ACEH presumes further weathering will have been caused by the introduction of a surfactant in 2007 at the site. CRA notes that the Leaking Underground Fuel Tank (LUFT) Manual (SWRCB, 2012) states that fresh gasoline will produce dissolved-phase concentrations of TPHg of at least 100,000 µg/l; however, ACEH also notes that the LUFT Manual also states that weathered gasoline will produce lower concentrations. The LUFT Manual also indicates that fresh gasoline will produce a maximum benzene concentration in groundwater of 29,000 µg/l benzene. The presence of benzene in groundwater from well MW-1 between 8,900 and 19,000 µg/l since September 2011 further indicates the presence of weathered gasoline LNAPL at the site.

   ACEH is also in disagreement that trend graphs contained in the SCM and work plan document a stable or downward contaminant trend at the site. The trend graphs document mixed indicators with decreasing, stable, and increasing trends; however, in particular ACEH notes that increasing trends appear to be more prevalent since the September 2007 surfactant injection event. In general it appears that the surfactant continues to mobilize LNAPL from soil to groundwater beneath the site. Trend graphs generated on Geotracker also indicate increasing trends in well MW-1 for TPHg and benzene (see two attached graphs). Review of the graphs indicates that groundwater concentrations increase with higher groundwater levels, thus indicating a residual LNAPL soil source beneath the site, as stated in the SCM and work plan.

   Therefore, ACEH requests the identification, installation, and reporting of an appropriate continuous interim LNAPL recovery method by the date identified below, to address residual LNAPL concentrations in groundwater at the site.

3. **Groundwater Monitoring –** The subject site is required to be sampled on a quarterly basis; consequently ACEH requests that groundwater monitoring reports be submitted in accordance with the following schedule.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH 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:

- **December 31, 2014 –** Work Plan Addendum
  File to be named RO274_WP_ADEBD_R_yyyy-mm-dd
- **January 16, 2015 –** Interim Remedial Action Plan
  File to be named: RO274_IRAP_R_yyyy-mm-dd
- **February 20, 2015 –** Site Investigation Report and Updated SCM
  File to be named: RO274_SWI_R_yyyy-mm-dd
- **February 20, 2015 –** Fourth Quarter 2014 Groundwater Monitoring Report
  Files to be named: RO274_GWM_R_yyyy-mm-dd
- **May 22, 2014 –** First Quarter 2015 Groundwater Monitoring Report
  File to be named: RO274_GWM_R_yyyy-mm-dd
- **August 21, 2015 –** Second Quarter 2015 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

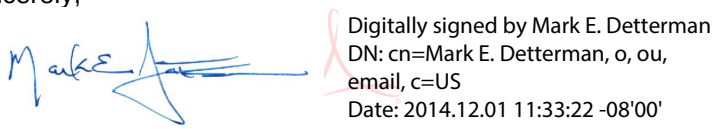
party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

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, ACEH 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,



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

MW-1 TPHg and Benzene Trend Graphs

cc: Celina Hernandez, Conestoga-Rovers & Associates, Inc., 5900 Hollis Street, Suite A, Emeryville, CA 94608; (sent via electronic mail to chernandez@craworld.com)

Nathan Lee, Conestoga-Rovers & Associates, Inc., 5900 Hollis Street, Suite A, Emeryville, CA 94608; (sent via electronic mail to nlee@craworld.com)

Leroy Griffin, Oakland Fire Department 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (sent via electronic mail to lgriffin@oaklandnet.com)

Dilan Roe, ACEH (sent via electronic mail to dilan.roe@acgov.org)
Mark Detterman (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:

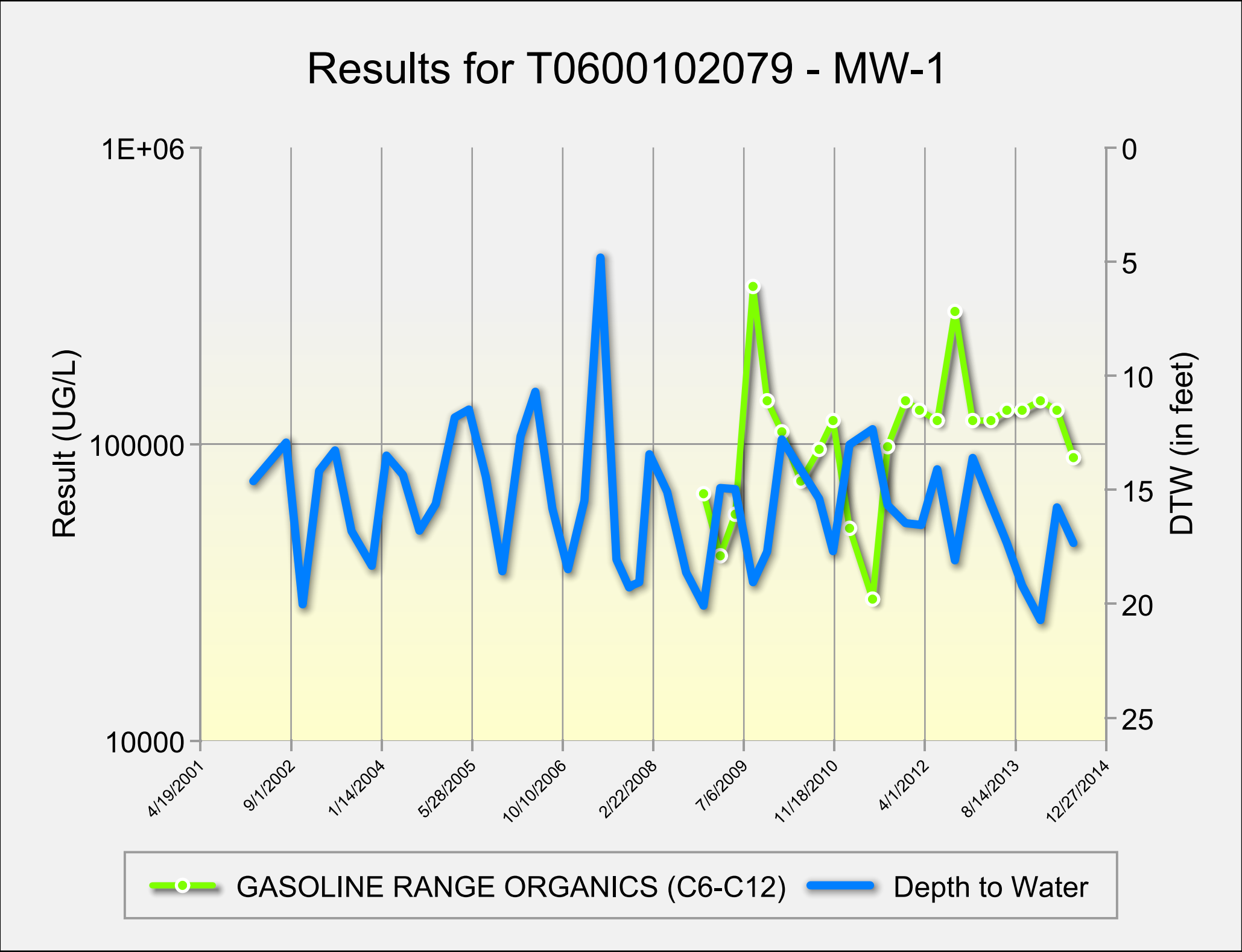
  RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

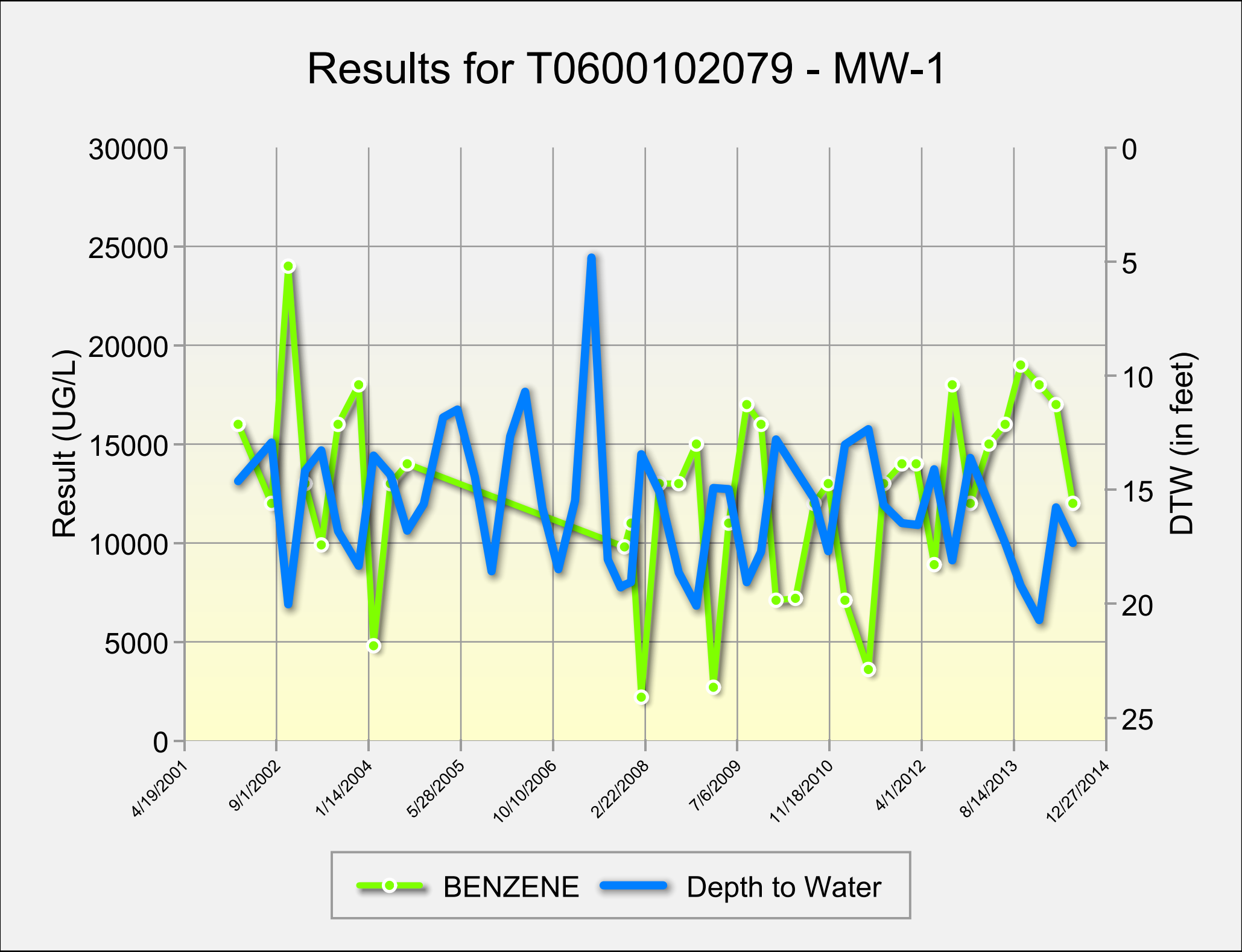
Submission Instructions

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.


Results for T0600102079 - MW-1
1E+06
100000
10000
Result (UG/L)
0
5
10
15
20
25
DTW (in feet)
4/19/2001
9/1/2002
1/14/2004
5/28/2005
10/10/2006
2/22/2008
7/6/2009
11/18/2010
4/1/2012
8/14/2013
12/27/2014
GASOLINE RANGE ORGANICS (C6-C12)
Depth to Water


Results for T0600102079 - MW-1
Result (UG/L)
DTW (in feet)
30000
25000
20000
15000
10000
5000
0
0
5
10
15
20
25
4/19/2001
9/1/2002
1/14/2004
5/28/2005
10/10/2006
2/22/2008
7/6/2009
11/18/2010
4/1/2012
8/14/2013
12/27/2014
BENZENE
Depth to Water