



ENVIRONMENTAL HEALTH DEPARTMENT
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
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July 1, 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: Conditional Work Plan Addendum 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 *Site Investigation Report and Updated Site Conceptual Model*, dated May 6, 2016, and the *First Quarter 2016 Groundwater Monitoring and Sampling Report*, dated May 16, 2016. The reports were prepared and submitted on your behalf by GHD Services, Inc (GHD). Thank you for submitting the reports.

The referenced Site Investigation and Site Conceptual Model (SCM) additionally included a work plan for the installation of two groundwater monitoring wells to aid in definition of the groundwater hydrocarbon plume and also proposed resampling existing soil vapor wells. ACDEH is in agreement that installation of the two wells is a reasonable step; however, depending on the results of the proposed work, observes that additional wells may be required to define the extent of the groundwater hydrocarbon plume to the southwest, southeast, and east.

Based on ACDEH staff review of the work plan, the proposed scope of work is conditionally 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. **Work Plan Modification** – The referenced work plan proposes a series of actions with which ACDEH is in general agreement of undertaking; however, ACDEH requests one modification to the proposed scope of work. Please submit a report by the date specified below.
 - a. **Soil Vapor Sampling** – In order to be protective of downgradient offsite residential homes, ACDEH is in agreement that additional seasonal soil vapor sampling is appropriate at the site. It is understood that moisture in existing vapor well VP-2 tubing prevented vapor sampling in February 2016 from the well; however, ACDEH observes that vapor wells VP-2

and VP-3 are the closest to the residential properties and it is therefore especially important to collect samples from these vapor wells. Please continue to collect and report oxygen, carbon dioxide, methane, tracer concentrations in the vapor sample, tracer concentrations in the shroud, and naphthalene by TO-17 in compliance with Department of Toxic Substances Control (DTSC) guidance.

- b. 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. The work plan additionally states that soil will additionally be collected in conjunction with lithology changes, photoionization detections, and other signs of contamination such as discoloration, and etc. In addition to collection, please ensure that each of these soil samples is submitted for laboratory analysis.
- 2. Interim Remedial Actions** – As stated in the December 1, 2014 directive letter, ACDEH is not in agreement with the conclusions regarding the presence of significant elevated concentrations of TPHg and benzene in groundwater at the site. Over the past three years, concentrations of TPHg continue to fluctuate up to 140,000 micrograms per liter ($\mu\text{g/l}$) and benzene up to 18,000 $\mu\text{g/l}$ during periods of lower water levels, and appear to suggest drainage from residual soil sources during the dryer months. As stated in the referenced directive letter, the groundwater concentrations are indicative of substantial residual contamination at the site, and may be indicative of Light Non Aqueous Phase Liquids (LNAPL) beneath the site. Whether the hydrocarbon concentrations in groundwater from well MW-1 is LNAPL, or is surfactant carried contaminant concentrations, it is appropriate to implement Interim Remedial Actions at the site.

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

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:

- **August 19, 2016** – Second Quarter 2015 Groundwater Monitoring Report
File to be named: RO274_GWM_R_yyyy-mm-dd
- **August 26, 2016** – Interim Remedial Action Plan
File to be named: RO274_IRAP_R_yyyy-mm-dd
- **September 16, 2016** – Site Investigation Report and Updated SCM
File to be named: RO274_SWI_R_yyyy-mm-dd
- **November 18, 2016** – 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, ACDEH is requesting your email address to help expedite communications and to help lower overall costs. Please provide that information in your next submittal.

Responsible Parties

RO0000274

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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

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

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