

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

COLLEEN CHAWLA, 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

September 11, 2018

Ms. Shelby Lathrop
Chevron Environmental Management Co.
6001 Bollinger Canyon Road, C2092
San Ramon, CA 94583
(Sent via electronic mail to:
slathrop@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 Draft Public Participation Document and Conditional Approval Corrective Action Implementation Plan; 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 a *Memo* dated May 15, 2018, the *Corrective Action Implementation Plan*, (CAIP) dated July 13, 2018, and the *Second Quarter 2018 Groundwater Monitoring and Sampling Report*, dated August 24, 2018. The memo and reports were prepared and submitted on your behalf by GHD Services, Inc (GHD). Thank you for submitting them.

The *Memo* documented a conference call between ACDEH, Chevron, and GHD that occurred on May 15, 2018 to discuss a remedial approach at the site. Based on a successful Dual Phase Extraction (DPE) pilot test conducted in 2002 at an adjacent site (7210 Bancroft Avenue; T0600100201; RO0000356), and a review of data from the subject site, Chevron and GHD judged the sites sufficiently similar to directly implement DPE at the subject site, rather than undertake additional pilot testing. ACDEH conditionally approved the approach with the incorporation of an evaluation of the initial data to be collected at the subject site as essentially a pilot test.

The referenced CAIP proposed a five day pilot test of a mobile Dual Phased Extraction (DPE) system, review of the data to be generated with ACDEH, and provided the data indicated a successful pilot test, continuing the mobile DPE event for an additional three month period. Because this process does not develop a "tool-kit" of potentially viable corrective action alternatives by fully evaluating three potential corrective actions prior to issuing a public participation document, should the DPE system be found to be inappropriate for the site, an additional public notice would be required for any alternative selected at that time.

Based on ACDEH staff review of the CAIP, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work.

TECHNICAL COMMENTS

- 1. Draft Public Participation Document** – Please note that public participation is a requirement for the CAP process. Therefore, ACDEH will notify potentially affected stakeholders who live or own property in the area surrounding of the proposed remediation, described in the above referenced documents, by the mailing of a fact sheet. Consequently, under separate cover, ACDEH will provide examples of

public participation documents for your modification to fit this site and subsequent return to ACDEH for finalization prior to issuing. Please return the draft notification in Word format for final modification, if required.

Public comments on the proposed remediation will be accepted for a period of thirty days. Following the public comment period, any comments received, including technical comments provided by ACDEH below, must be addressed and incorporated into a Final CAIP, by the date identified below.

2. **Conditional Pilot Test Approval** – The referenced CAIP proposes a several actions which ACDEH is in general agreement of undertaking; however, ACDEH requests modifications to the scope of work as discussed below. Please submit a Final CAIP by the date identified below.
 - a. **Pilot Test Length** – The referenced report indicated that a five day pilot test would be conducted. ACDEH is in general concurrence with this length of time; however, is providing approval for a pilot test of up to 10 days, with subsequent review of data with ACDEH, if required.
 - b. **Installation of Separate Pilot Test DPE Wells** – In order to assess the relative success of the proposed DPE pilot test, and if appropriate, of implementation of full scale corrective actions, ACDEH requests that wells MW-1 and MW-7 remain in-place for continued monitoring of groundwater at the site. The installation of separate larger diameter DPE wells at locations in proximity to the wells is an appropriate method to help determine the success of the proposed actions.
 - c. **Implementation Timing** – Due to annual groundwater fluctuations at the site ACDEH is in general agreement that implementation of corrective actions in the autumn months of 2019 may be an appropriate time; however, installation of DPE wells, and the submittal of an installation report is requested by the date identified below.
 - d. **Pilot Test Evaluation** – At a minimum, please ensure the data to be generated for the pilot test review with ACDEH includes the following:
 - i. Flow rates and totals for all phases from each extraction point and combined manifold.
 - ii. Concentrations in groundwater and vapor phase from each extraction point, treatment influent, midpoints (if applicable), and discharge.
 - iii. Vapor phase pressures and head at extraction and sentry locations for all operational periods.
 - iv. System operation under sustained and pulse conditions for at least two extraction rates to allow calculation of variable pressures on ROI for all phases.
 - v. Determination of vapor and aqueous phase ROI.
 - e. **Rebound Assessment** – The referenced CAIP proposed a corrective action system shut-down goal of 10 pounds per day for total volatile organic compounds (VOCs). This may be appropriate once corrective action is implemented; however, as indicated by the technical comments above, groundwater contaminant rebound concentrations are a necessary part in determining the success of the corrective action efforts.
3. **Groundwater Monitoring** – In an effort to collect data quickly, wells MW-11 and MW-12 are requested to continue on a quarterly groundwater monitoring and sampling basis for a full hydrologic cycle. At that time the wells are requested to be converted to a semi-annual basis consistent with the historic sampling interval at the site. Please submit reports by the dates identified below.

TECHNICAL REPORT REQUEST

Please submit the following technical reports and deliverables to the State Water Board's Geotracker website and notify your case worker by electronic mail (mark.detterman@acgov.org), in accordance with the following specified file naming convention and schedule, as provided below, and in the Responsible Party(ies) Legal Requirements/Obligations which is included as Attachment 1. Please note ACDEH no longer accepts reports on the ftp site.

- **October 5, 2018** – Draft Public Notification Document (in Word Format)
Please email your case worker
- **October 11, 2018** – Third Quarter 2019 Groundwater Monitoring Report
File to be named: RO274_GWM_R_YYYY-mm-dd
- **October 19, 2018 to November 19, 2018** – Public Comment Period
- **December 21, 2018** – Final CAIP Report
File to be named: RO274_CAIP_R_YYYY-mm-dd
- **February 22, 2019** – DPE Well Installation Report
File to be named: RO274_SWI_R_YYYY-mm-dd
- **April 5, 2019** – First Quarter 2019 Groundwater Monitoring Report
File to be named: RO274_GWM_R_YYYY-mm-dd
- **September 30, 2019** – Pilot Test Review Data Submittal
File to be named: RO274_SWI_R_YYYY-mm-dd
- **December 20, 2019** – Remedial Progress Report
File to be named: RO274_REM_R_YYYY-mm-dd

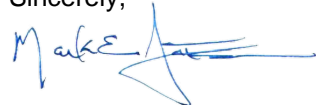
These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance 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,



Mark E. Detterman, PG 4799, CEG 1788
Senior Geologist
Senior Hazardous Materials Specialist

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

Responsible Parties

RO0000274

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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)

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

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) 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 licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.