



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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October 27, 2009

Mr. Aaron Costa
Chevron Corporation
6111 Bollinger Canyon Road, Rm 3660
San Ramon, CA
(sent via electronic mail to acosta@chevron.com)

Mr. Mark Hom and Anna Cheng
3135 Gibbons Drive
Alameda, CA, 94501-1749

JL and Jane Bolton
3135 Gibbons Drive
Alameda, CA 94501-1749

Subject: Request for Interim Remedial Actions; Fuel Leak Case No. RO0000341 (Global ID # T0600100330), Chevron #9-1153, (3126 Fernside Blvd), 3135 Gibbons Drive, Alameda, CA 94501

Ladies and Gentlemen:

Alameda County Environmental Health Department (ACEH) staff has reviewed the case file, and the most recent report prepared by Conestoga-Rovers & Associates (CRA) and submitted for this site, *Third Quarter 2008 Groundwater Monitoring Report*, dated November 18, 2008. Thank you for submitting the reports. As you are aware, this is a residential property. During the October 2008 sampling event approximately 0.4 feet of free phase petroleum hydrocarbon was detected in onsite monitoring well C-1. Between September 2009 and December 2009 free-phase was again present in this well at increased thicknesses in comparison to recent monthly measurements. This appears to be the most recent data currently available for review. As a consequence, ACEH requests that you address the following technical comments and send us the reports requested below.

TECHNICAL COMMENTS

- 1. Interim Remedial Action.** Measurable thickness records for the site date to the mid-1990's and document that free-phase has generally been present in well C-1 on a on-going (monthly) basis since January 1995. While five mobile extraction events were conducted to reduce free-phase thicknesses in 2001 and early 2002, and the monthly hand bailing of well C-1 continues, no on-going active remediation to remove residual free product has been performed at the site since May 1994 when the extraction trench was shut down. Three soil vapor sampling events have occurred at the site (1987, 1989, and 2002) and data from each event continues to indicate residual hydrocarbons in the south and eastern portions of the site, consistent with a residual hydrocarbon source in this vicinity of the site. Due to the increased and continued presence of free phase in well C-1, and elevated soil vapor concentrations indicative of residual hydrocarbon sources in the vicinity, ACEH requests that you prepare a work plan which discusses a proposal to remove or otherwise remediate residual free product from beneath the site and vicinity. To evaluate progress of free product removal or treatment we request that you include a proposal to perform groundwater monitoring and sampling during these actions. Should recent changes to the monitoring schedule be warranted, please propose them. Please submit your proposal in the work plan requested below.
- 2. Installation of Vapor Points.** Three previous vapor surveys have been conducted at the site using varying or undisclosed sampling protocols. Elevated vapor concentrations were detected, including some within the area of the residential building. While a risk assessment has been generated using the data, changing advances in vapor sampling methodology, including use of shrouds and tracer gases to confirm a lack of sampling leaks, has been occurring. As you are aware, these changes help assure the vapor samples are representative of subsurface vapor concentrations. As a consequence ACEH is also requesting the generation of a work plan for

the installation, sampling, and analysis of vapor from permanent vapor sampling points at this residential site. Because groundwater is very shallow (under 5 feet) sub-slab samples may be warranted; please evaluate this potential in the work plan. Please submit your proposal in the work plan requested below.

3. **Screen Interval for Wells C-1 and C-2.** The screen interval for these wells is 20-feet in length. The bore log for all wells including well C-1 suggests that the presence of hydrocarbons is predominately limited to the upper four to eight feet below grade surface (bgs). ACEH is concerned that the screen interval for well C-1 may allow dissolved phase to migrate down well. Please evaluate the appropriateness of the screen length at these locations in the work plan requested below.
4. **Extraction Trench Construction Design.** A groundwater extraction trench and recovery well RW-1 functioned between 1991 and May 1994, had an estimated groundwater extraction rate of 0.08 gallons per minute, and treated nearly 100,000 gallons of highly impacted groundwater. Other than the plan location of the extraction trench and the location of the recovery well, an extraction system design was not found in the case file. Please forward design details of this remedial extraction system in the work plan requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Mark Detterman), according to the following schedule:

- **January 15, 2009** – Work Plan

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

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

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.

Should you have any questions, do not hesitate to call me at (510) 567-6876.

Sincerely,

Mark E. Detterman, PG, CEG
Hazardous Materials Specialist

cc: Charlotte Evans, Conestoga-Rovers & Assoc., 5900 Hollis Street, Suite A, Emeryville, CA 94608
(sent via electronic mail to Cevans@croworld.com)

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

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

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

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

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
 - Or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of My Le Huynh.
 - 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 and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - 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.