Detterman, Mark, Env. Health

From:	Detterman, Mark, Env. Health
Sent:	Thursday, August 15, 2013 4:42 PM
То:	'Hoey, Kiersten'; 'espino@chevron.com'
Cc:	Roe, Dilan, Env. Health
Subject:	RE: RO0342 Well Completion Request and Request for Data Gap Work Plan, Focused SCM, Preferential Pathway Survey, and Path to Closure Schedule
Attachments:	RO342_Signed_DWR_Form.pdf; Attachment B Site Conceptual Model.pdf; Attachment C Path to Closure Project Schedule.pdf; Attachment A Preferential Pathway and Sensitive Recptor Survey.pdf

Kiersten,

Here's the signed DWR form. Please also forward a signed copy of the Alameda County Dept of Public Works well survey form as the two databases are different enough to get interesting results, and thus will capture a more complete well record of a location. ACEH is in agreement that both information sources will help move the case along a path towards closure. In order to expedite that path, ACEH requests the information be submitted in a focused Site Conceptual Model that identifies site data gaps, evaluates potential conduits (utilities and wells – already captured above), evaluates the site under the Low Threat Closure Policy, includes a Data Gap Work Plan as needed, and details a Path to Closure Schedule. Initial LTCP reviews of cases are available on Geotracker. Please see Attachment A (Preferential Pathway and Sensitive Receptor Survey), Attachment B (Site Conceptual Model) and Attachment C (Path to Closure Schedule) for the requisite detail for these items.

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:

• October 31, 2013 – Resulting Report File to be named RO342_SCM / WP / RFC_R_yyyy-mm-dd (as appropriate)

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.

Should you have questions, please let me know.

Mark Detterman Senior Hazardous Materials Specialist, PG, CEG Alameda County Environmental Health 1131 Harbor Bay Parkway Alameda, CA 94502 Direct: 510.567.6876 Fax: 510.337.9335 Email: <u>mark.detterman@acgov.org</u>

PDF copies of case files can be downloaded at:

http://www.acgov.org/aceh/lop/ust.htm

From: Hoey, Kiersten [mailto:khoey@craworld.com]
Sent: Wednesday, August 14, 2013 2:58 PM
To: Detterman, Mark, Env. Health
Subject: RO0342 Well Completion Report Request form

Hi Mark,

Will you please sign and return the attached well completion request for RO0342 (Chevron Station 94800, 1700 Castro Street, Oakland), so that we can request well completion report from DWR within a 2,000 feet radius of the site.

Thank you, Kiersten

Kiersten Hoey

Conestoga-Rovers & Associates

Address: 5900 Hollis Street, Suite A, Emeryville, CA 94608 Phone: 510-420-3347 Fax: 510-420-9170 Mobile: 916-919-0358

khoey@craworld.com

www.craworld.com

PLEASE THINK BEFORE YOU PRINT Perform every task the safe way, the right way, every time!



This communication and any accompanying document(s) are confidential and are intended for the sole use of the addressee. If you are not the intended recipient, please notify me at the telephone number shown above or by return e-mail and delete this e-mail and any copies. You are advised that any disclosure, copying, distribution, or the taking of any action in reliance upon the communication without consent is strictly prohibited. Thank you.

ATTACHMENT A

Preferential Pathway and Sensitive Receptor Study

Preferential Pathway and Sensitive Receptor Study – Please conduct a study to (1) locate potential anthropogenic migration pathways on and in the vicinity of the site that could spread contamination through vertical and lateral migration, (2) determine the probability of nonaqueous phase liquid (NAPL) and/or contaminant plumes (groundwater and/or soil vapor) encountering anthropogenic preferential pathways, and (3) identify exposure scenarios and sensitive receptors that are linked to site contamination through these preferential pathways. The results of your study shall contain all information required by California Code of Regulations, Title 23, Division 3, Chapter 16, §2654(b) including but not limited to the following components, as applicable to the site:

- I. Utility Survey An evaluation of all existing subsurface utility lines, laterals, and trenches including sewers, electrical, fiber optic cable, cable, water, storm drains, trench backfill, etc. within and near the site and plume area(s). Please include an evaluation of utilities associated with current and historical site operations/processes including UST systems, remediation systems, parts cleaning, sumps, etc.
- II. Well Survey Identification of all active, inactive, standby, decommissioned (sealed with concrete), unrecorded, and abandoned (improperly decommissioned or lost) wells including monitoring, remediation, irrigation, water supply, industrial, livestock, dewatering, and cathodic protection wells within a ¼-mile radius of the subject site. Please inspect all available Well Completion Reports filed with the Department of Water Resources (DWR) and Alameda County Public Works in your survey, and perform a background study of the historical land uses of the site and properties in the vicinity of the site. Use the results of your background study to determine the existence of unrecorded/unknown (abandoned) wells, which can act as contaminant migration pathways at or from your site.
- III. Building Evaluation Identification of existing and historical building foundational elements that can link potential receptors to the contaminant plumes and/or act as preferential pathways for contaminant migration. Include the age, type, and depth of element (e.g., slab on grade, grade beam, piers, basements, etc.), and associated engineering control systems (vapor barriers, etc).
- **IV.** Land Uses and Exposure Scenarios on the Facility and Adjacent Properties Identification of existing and future land use on and in the vicinity of the site including:
 - Beneficial resources (e.g., groundwater classification, wetlands, surface water bodies, natural resources, etc.)
 - Subpopulation types and locations (e.g., schools, hospitals, day care centers, elder care facilities, etc.)
 - Exposure scenarios (e.g. residential, industrial, recreational, farming) and exposure pathways including those identified in the Low Threat Underground Storage Tank Case Closure Policy General Criteria h – Nuisance Conditions, and Media-Specific Criteria for Groundwater, Vapor Intrusion to Indoor Air, and Direct Contact and Outdoor Air Exposure
- V. Planned Development If future development activities are planned in the vicinity of the site, include an analysis of new utility corridors, building foundations, wells, and/or development activities that could significantly alter contaminant migration (i.e., covering of large areas of the site with pavement, etc.).

Please synthesize this information and discuss your analysis and interpretation of the results of the preferential pathway and sensitive receptor study and incorporate into an updated Conceptual Site Model. Please provide the following supporting documentation and data as applicable:

ATTACHMENT A

- Copies of current and historical maps, such as site maps, Sanborn maps, aerial photographs, etc., used when conducting the background study.
- DWR well logs, marked as confidential, uploaded to Alameda County Environmental Health's ftp site. For confidentiality purposes <u>do not upload the DWR well logs to Geotracker</u>. The well logs will be placed in our confidential file and will be available only to internal staff for review.
- Table with details of the well search findings including Map ID corresponding to well location on map, State Well ID, Well Owner ID, approximate distance from the site, direction from the site, use, installation date, depth (feet below ground surface [bgs]), screened interval (feet bgs), sealed interval (feet bgs), diameter (inches), and well location address.
- Maps and geologic cross-sections illustrating historical groundwater elevations and flow directions (rose diagram) at the site. Synthesize the data requested above and include the location and depth of all utility lines, trenches, UST pits and piping trenches, wells, surface water bodies, foundational elements, surface covering types (pavement, landscaped, etc.) within and near the site and plume area(s), and the location of potential receptors.

ATTACHMENT B

Site Conceptual Model Requisite Elements

ATTACHMENT B

Site Conceptual Model

The site conceptual model (SCM) is an essential decision-making and communication tool for all interested parties during the site characterization, remediation planning and implementation, and closure process. A SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely magnitude of potential impacts to receptors.

The SCM is initially used to characterize the site and identify data gaps. As the investigation proceeds and the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened until it is said to be "validated". At this point, the focus of the SCM shifts from site characterization towards remedial technology evaluation and selection, and later remedy optimization, and forms the foundation for developing the most cost-effective corrective action plan to protect existing and potential receptors.

For ease of review, Alameda County Environmental Health (ACEH) requests utilization of tabular formats to (1) highlight the major SCM elements and their associated data gaps which need to be addressed to progress the site to case closure (see Table 1 of attached example), and (2) highlight the identified data gaps and proposed investigation activities (see Table 2 of the attached example). ACEH requests that the tables presenting the SCM elements, data gaps, and proposed investigation activities be updated as appropriate at each stage of the project and submitted with work plans, feasibility studies, corrective action plans, and requests for closures to support proposed work, conclusions, and/or recommendations.

The SCM should incorporate, but is not limited to, the topics listed below. Please support the SCM with the use of large-scaled maps and graphics, tables, and conceptual diagrams to illustrate key points. Please include an extended site map(s) utilizing an aerial photographic base map with sufficient resolution to show the facility, delineation of streets and property boundaries within the adjacent neighborhood, downgradient irrigation wells, and proposed locations of transects, monitoring wells, and soil vapor probes.

- a. Regional and local (on-site and off-site) geology and hydrogeology. Include a discussion of the surface geology (e.g., soil types, soil parameters, outcrops, faulting), subsurface geology (e.g., stratigraphy, continuity, and connectivity), and hydrogeology (e.g., water-bearing zones, hydrologic parameters, impermeable strata). Please include a structural contour map (top of unit) and isopach map for the aquitard that is presumed to separate your release from the deeper aquifer(s), cross sections, soil boring and monitoring well logs and locations, and copies of regional geologic maps.
- b. Analysis of the hydraulic flow system in the vicinity of the site. Include rose diagrams for depicting groundwater gradients. The rose diagram shall be plotted on groundwater elevation contour maps and updated in all future reports submitted for your site. Please address changes due to seasonal precipitation and groundwater pumping, and evaluate the potential interconnection between shallow and deep aquifers. Please include an analysis of vertical hydraulic gradients, and effects of pumping rates on hydraulic head from nearby water supply wells, if appropriate. Include hydraulic head in the different water bearing zones and hydrographs of all monitoring wells.
- c. Release history, including potential source(s) of releases, potential contaminants of concern (COC) associated with each potential release, confirmed source locations, confirmed release locations, and existing delineation of release areas. Address primary leak source(s) (e.g., a tank, sump, pipeline, etc.) and secondary sources (e.g., high-

ATTACHMENT B

Site Conceptual Model (continued)

concentration contaminants in low-permeability lithologic soil units that sustain groundwater or vapor plumes). Include local and regional plan view maps that illustrate the location of sources (former facilities, piping, tanks, etc.).

- d. Plume (soil gas and groundwater) development and dynamics including aging of source(s), phase distribution (NAPL, dissolved, vapor, residual), diving plumes, attenuation mechanisms, migration routes, preferential pathways (geologic and anthropogenic), magnitude of chemicals of concern and spatial and temporal changes in concentrations, and contaminant fate and transport. Please include three-dimensional plume maps for groundwater and two-dimensional soil vapor plume plan view maps to provide an accurate depiction of the contaminant distribution of each COC.
- e. Summary tables of chemical concentrations in different media (i.e., soil, groundwater, and soil vapor). Please include applicable environmental screening levels on all tables. Include graphs of contaminant concentrations versus time.
- f. Current and historic facility structures (e.g., buildings, drain systems, sewer systems, underground utilities, etc.) and physical features including topographical features (e.g., hills, gradients, surface vegetation, or pavement) and surface water features (e.g. routes of drainage ditches, links to water bodies). Please include current and historic site maps.
- g. Current and historic site operations/processes (e.g., parts cleaning, chemical storage areas, manufacturing, etc.).
- h. Other contaminant release sites in the vicinity of the site. Hydrogeologic and contaminant data from those sites may prove helpful in testing certain hypotheses for the SCM. Include a summary of work and technical findings from nearby release sites, including the two adjacent closed LUFT sites, (i.e., Montgomery Ward site and the Quest Laboratory site).
- i. Land uses and exposure scenarios on the facility and adjacent properties. Include beneficial resources (e.g., groundwater classification, wetlands, natural resources, etc.), resource use locations (e.g., water supply wells, surface water intakes), subpopulation types and locations (e.g., schools, hospitals, day care centers, etc.), exposure scenarios (e.g. residential, industrial, recreational, farming), and exposure pathways, and potential threat to sensitive receptors. Include an analysis of the contaminant volatilization from the subsurface to indoor/outdoor air exposure route (i.e., vapor pathway). Please include copies of Sanborn maps and aerial photographs, as appropriate.
- j. Identification and listing of specific data gaps that require further investigation during subsequent phases of work. Proposed activities to investigate and fill data gaps identified.

TABLE 1

INITIAL SITE CONCEPTUAL MODEL

CSM Element	CSM Sub- Element	Description	Data Gap
Geology and Hydrogeology	Regional	The site is in the northwest portion of the Livermore Valley, which consists of a structural trough within the Diablo Range and contains the Livermore Valley Groundwater Basin (referred to as "the Basin") (DWR, 2006). Several faults traverse the Basin, which act as barriers to groundwater flow, as evidenced by large differences in water levels between the upgradient and downgradient sides of these faults (DWR, 2006). The Basin is divided into 12 groundwater basins, which are defined by faults and non-water-bearing geologic units (DWR, 1974).	None
		The hydrogeology of the Basin consists of a thick sequence of fresh-water-bearing continental deposits from alluvial fans, outwash plains, and lacustrine environments to up to approximately 5,000 feet bgs (DWR, 2006). Three defined fresh-water bearing geologic units exist within the Basin: Holocene Valley Fill (up to approximately 400 feet bgs in the central portion of the Basin), the Plio-Pleistocene Livermore Formation (generally between approximately 400 and 4,000 feet bgs in the central portion of the Basin), and the Pliocene Tassajara Formation (generally between approximately 250 and 5,000 or more feet bgs) (DWR, 1974). The Valley Fill units in the western portion of the Basin are capped by up to 40 feet of clay (DWR, 2006).	
	Site	Geology: Borings advanced at the site indicate that subsurface materials consist primarily of finer-grained deposits (clay, sandy clay, silt and sandy silt) with interbedded sand lenses to 20 feet below ground surface (bgs), the approximate depth to which these borings were advanced. The documented lithology for one on- site boring that was logged to approximately 45 feet bgs indicates that beyond approximately 20 feet bgs, fine-grained soils are present to approximately 45 feet bgs. A cone penetrometer technology test indicated the presence of sandier lenses from approximately 45 to 58 feet bgs and even coarser materials (interbedded with finer-grained materials) from approximately 58 feet to 75 feet bgs, the total depth drilled. The lithology documented at the site is similar to that reported at other nearby sites, specifically the Montgomery Ward site (7575 Dublin Boulevard), the Quest laboratory site (6511 Golden Gate Drive), the Shell-branded Service Station site (11989 Dublin Boulevard), and the Chevron site (7007 San Ramon Road).	As noted, most borings at the site have been advan to approximately 20 feet bgs, and one boring has be advanced and logged to 45 feet bgs; CPT data was collected to 75 feet bgs at one location. Lithologic d will be obtained from additional borings that will be advanced on site to further the understanding of the subsurface, especially with respect to deeper litholo
		<i>Hydrogeology:</i> Shallow groundwater has been encountered at depths of approximately 9 to 15 feet bgs. The hydraulic gradient and groundwater flow direction have not been specifically evaluated at the site.	The on-site shallow groundwater horizontal gradient has not been confirmed. Additionally, it is not known there may be a vertical component to the hydraulic gradient.
Surface Water Bodies		The closest surface water bodies are culverted creeks. Martin Canyon Creek flows from a gully west of the site, enters a culvert north of the site, and then bends to the south, passing approximately 1,000 feet east of the site before flowing into the Alamo Canal. Dublin Creek flows from a gully west of the site, enters a culvert approximately 750 feet south of the site, and then joins Martin Canyon Creek approximately 750 feet southeast of the site.	None
Nearby Wells		The State Water Resources Control Board's GeoTracker GAMA website includes information regarding the approximate locations of water supply wells in California. In the vicinity of the site, the closest water supply wells presented on this website are depicted approximately 2 miles southeast of the site; the locations shown are approximate (within 1 mile of actual location for California Department of Public Health supply wells and 0.5 mile for other supply wells). No water-producing wells were identified within 1/4 mile of the site in the well survey conducted for the Quest Laboratory site (6511 Golden Gate Drive; documented in 2009); information documented in a 2005 report for the Chevron site at 7007 San Ramon Road indicates that a water-producing well may exist within 1/2 mile of the site.	A formal well survey is needed to identify water- producing, monitoring, cathodic protection, and dewatering wells.

	How to Address
	NA
vanced	Two direct push borings and four multi-port wells
s been	will be advanced to depth (up to approximately 75 feet bas) and soil lithology will be logged. See
c data	items 4 and 5 on Table 2.
be	
the	
lology.	
ient	Shallow and deeper groundwater monitoring wells
own if	will be installed to provide information on lateral
IIIC	and vertical gradients. See Items 2 and 5 on Table 2
	NA
	Obtain data regarding nearby, permitted wells
	from the California Department of Water
	Resources and Zone 7 water Agency (item 11 on Table 2).

TABLE 2

DATA GAPS AND PROPOSED INVESTIGATION

Item	Data Gap	Proposed Investigation	Rationale
5	Evaluate the possible presence of impacts to deeper groundwater. Evaluate deeper groundwater concentration trends over time. Obtain data regarding the vertical groundwater gradient. Obtain more lithological data below 20 feet bgs.	Install four continuous multichannel tubing (CMT) groundwater monitoring wells (aka multi-port wells) to approximately 65 feet bgs in the northern parking lot with ports at three depths (monitoring well locations may be adjusted pending results of shallow grab groundwater samples; we will discuss any potential changes with ACEH before proceeding). Groundwater monitoring frequency to be determined. Soil samples will be collected only if there are field indications of impacts. Soil lithology will be logged. However, information regarding the moisture content of soil may not be reliable using sonic drilling technology (two borings will be logged using direct push technology; see Item 4, above).	One well is proposed at the western (upgradient) property boundary to confirm that there are no deeper groundwater impacts from upgradient. Two wells are proposed near the center of the northern parking lot to evaluate potential impacts in an area where deeper impacts, if any, would most likely to be found. One well is proposed at the eastern (downgradient) property boundary to confirm that there are no impacts extending off-site. Port depths will be chosen based on the locations of saturated soils (as logged in direct push borings; see Item 4, above), but are expected at approximately 15, 45, and 60 feet bgs.
6	Evaluate possible off-site migration of impacted soil vapor in the downgradient direction (east). Evaluate concentration trends over time.	Install 4 temporary nested soil vapor probes at approximately 4 and 8 feet bgs along the eastern property boundary. Based on the results of the sampling, two sets of nested probes will be converted to vapor monitoring wells to allow for evaluation of VOC concentration trends over time.	Available data indicate that PCE and TCE are present in soil vapor in the eastern portion of the northern parking lot. Samples are proposed on approximately 50-foot intervals along the eastern property boundary to provide a transect of concentrations through the vapor plume. The depths of 4 and 8 feet bgs are chosen to provide data closest to the source (i.e., groundwater) while avoiding saturated soil, and also provide shallower data to help evaluate potential attenuation within the soil column. Two sets of nested vapor probes will be converted into vapor monitoring wells (by installing well boxes at ground surface); the locations of the permanent wells will be chosen based on the results of samples from the temporary probes.
7	Evaluate potential for off-site migration of impacted groundwater in the downgradient direction (east).	Advance two borings to approximately 20 feet bgs in the parking lot of the property east of the Crown site for collection of grab groundwater samples.	Two borings are proposed off-site, on the property east of the Crown site, just east o the building in the expected area of highest potential VOC concentrations.
8	Evaluate VOC concentrations just north of the highest concentration area.	Advance two borings to approximately 20 feet bgs north of Building A for collection of soil and grab groundwater samples. Soil samples will be collected at two depths in the vadose zone. Soil samples will be collected based on field indications of impacts (PID readings, odor, staining) or, in the absence of field indications of impacts, at 5 and 10 feet bgs.	The highest concentrations of PCE in groundwater were detected at boring NM-B- 32, just north of Building A. The nearest available data to the north are approximately 75 feet away. One of the borings will be advanced approximately 20 feet north of NM B-32 to provide data close to the highest concentration area. A second boring will be advanced approximately halfway between the first boring and former boring NM-B- 33 to provide additional spatial data for contouring purposes. These borings will be part of a transect in the highest concentration area.
9	Evaluate VOC concentrations in soil vapor in the south parcel of the site.	Install four temporary soil vapor probes at approximately 5 feet bgs around boring SV-25, where PCE was detected in soil vapor at a low concentration.	PCE was detected in soil vapor sample SV-25 in the southern parcel, although was not detected in groundwater in that area. Three probes will be installed approximately 30 feet from of boring SV-25 to attempt to delineate the extent of impacts. A fourth probe is proposed west of the original sample, close to the property boundary and the location of mapped utility lines, which may be a potential conduit, to evaluate potential impacts from the west.
10	Obtain additional information regarding subsurface structures and utilities to further evaluate migration pathways and sources.	Ground penetrating radar (GPR) and other utility locating methodologies will be used, as appropriate, to further evaluate the presence of unknown utilities and structures at the site.	Utilities have been identified at the site that include an on-site sewer lateral and drain line, and shallow water, electric, and gas lines. Given the current understanding of the distribution of PCE in groundwater at the site, it is possible that other subsurface utilities, and specifically sewer laterals, exist that may act as a source or migration pathway for distribution of VOCs in the subsurface.

	Analysis
at ed at s	<i>Groundwater:</i> VOCs by EPA Method 8260, dissolved oxygen, oxidation/reduction potential, temperature, pH, and specific conductance.
ot ons ata n.	<i>Soil vapor</i> : VOCs by EPA Method TO-15.
t of	<i>Groundwater:</i> VOCs by EPA Method 8260, dissolved oxygen, oxidation/reduction potential, temperature, pH, and specific conductance.
- NM- be 3- e	<i>Groundwater:</i> VOCs by EPA Method 8260, dissolved oxygen, oxidation/reduction potential, temperature, pH, and specific conductance. <i>Soil:</i> VOCs by EPA Method 8260 (soil samples to be collected using field preservation in accordance with EPA Method 5035).
as erty it,	Soil vapor: VOCs by EPA Method TO-15.
nat	NA

ATTACHMENT C

Path to Closure Project Schedule Requisite Elements

ATTACHMENT C

Path to Closure Project Schedule Requisite Elements

The State Water Resources Control Board passed Resolution No. 2012-0062 on November 6, 2012 which requires development of a "Path to Closure Plan" by December 31, 2013 that addresses the impediments to closure for the site. Please prepare a Path to Closure Schedule that has milestone dates tied to calendar quarters which will achieve site cleanup and case closure in a timely and efficient manner and minimizes the cost of corrective action. The complexity of the Path to Closure Schedule should be commensurate with the complexity of the site and tasks required to achieve case closure. ACEH will review the schedule to ensure appropriate key elements are included.

The Path to Closure Schedule should the following key environmental elements and milestones as appropriate:

- Preferential Pathway Study
- Soil, Groundwater, and Soil Vapor Investigations
- Initial, Updated, and Final/Validated SCMs
- Interim Remedial Actions
- Feasibility Study/Corrective Action Plan
- Pilot Tests
- Remedial Actions
- Soil Vapor and Groundwater Monitoring Well Installation and Monitoring
- Public Participation Program (Fact Sheet Preparation/Distribution/Public Comment Period, Community Meetings, etc.)
- Case Closure Tasks (Request for closure documents, ACEH Case Closure Summary Preparation and Review, Site Management Plan, Institutional Controls, Public Participation, Landowner Notification, Well Decommissioning, Waste Removal, and Reporting.)

Please include time for regulatory and RP in house review, permitting, off-site access agreements, and utility connections, etc.

For complex projects (i.e., redevelopment projects, etc.), please use a critical path methodology/tool to construct a schedule with sufficient detail to support a realistic and achievable Path to Closure Schedule. The schedule is to include at a minimum:

- Defined work breakdown structure including summary tasks required to accomplish the project objectives and required deliverables
- Summary task decomposition into smaller more manageable components that can be scheduled, monitored, and controlled
- Sequencing of activities to identify and document relationships among the project activities using logical relationships
- Identification of critical paths, linkages, predecessor and successor activities, leads and lags, and key milestones
- Identification of entity responsible for executing work
- Estimated activity durations (60-day ACEH review times are based on calendar days)