



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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November 21, 2013

Mr. Eric Hetrick
Chevron Corporation
6101 Bollinger Canyon Road
San Ramon, CA 94583
(sent via electronic mail to:
ehetrick@chevron.com)

Kevin & Julia Hinkley
Kevin Hinkley Service
5269 Crow Canyon Road
Castro Valley, CA 94552

Subject: Conditional Approval of RAP Addendum and Request for Work Plan; Fuel Leak Case No. RO0000350 and GeoTracker Global ID T0600100344, Chevron #9-5607, 5269 Crow Canyon Road, Castro Valley, CA 94552

Dear Mr. Hetrick, and Mr. and Ms. Hinkley:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including the *Revised Drilling Scope of Work* (RAP Addendum), dated November 7, 2013. The document was prepared and submitted on your behalf by Conestoga-Rovers & Associates (CRA). Thank you for submitting the report. The Work Plan was prepared to document changes in remedial system presented in the *Remedial Action Plan Implementation Plan*, dated August 2, 2013 in order to address public comments and additional data that has been collected since that time.

Based on ACEH staff review of the RAP Addendum the proposed scope of work is conditionally approved provided the technical approach, and the technical comments listed below are incorporated prior to and during the implementation of the work. Submittal of a further revised work plan or work plan addendum for this scope of work is not required unless an alternate scope of work outside that described in the work plan or technical comments below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the reports 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. **RAP Addendum Modifications** – The referenced work plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests several modifications to the approach. Please submit a report by the date specified below.
 - a. **SVE Installation** – The *Revised Drilling Scope of Work* proposes the installation of two Soil Vapor Extraction (SVE) wells in the vicinity of the former dispenser islands as a result of elevated vapor concentrations in the vicinity. The SVE wells are proposed to be screened between 10 and 20 feet below grade surface (bgs). ACEH requests that this screening interval be re-evaluated prior to well installation due to the detection of vapor concentrations of concern at a shallower depth (seven feet bgs). ACEH's intent is to ensure that potentially shallow secondary sources (soil contamination) be addressed and mitigated by the proposed installation of the two SVE wells.
 - b. **Conversion of Monitoring Well C-9** – The referenced report proposes to convert 4-inch diameter groundwater monitoring well C-9 to a Dual Phase Extraction (DPE) well, and to additionally continue to monitor groundwater from the well. ACEH is not opposed to the conversion of the monitoring well to a DPE well; however, ACEH notes that future groundwater sampling from the well will be biased low and may not represent groundwater

concentrations beyond the zone of influence of the DPE well. This same rationale was used for the request for separate DPE wells in the source zone, rather than conversion of monitoring wells C-1, C-3, and C-6.

Please be aware that should this well be converted, additional time may be required in the Verification Monitoring phase of Corrective Actions to verify contaminant rebound conditions are no longer occurring.

- c. **Groundwater Monitoring Wells Between C-9 and C-12** – ACEH has reviewed the analysis for eliminating the two wells currently proposed for installation between wells C-9 and C-12. ACEH is in general agreement that the wells can be eliminated. The recent collection of soil vapor analytical data, in addition to the two other lines of evidence discussed in the referenced document, has helped in this reevaluation of the need for the wells in these locations.

2. **Groundwater Monitoring Well Installation Work Plan; Length of Groundwater Plume** – The renewed focus on well C-9 due to the substantial increase in groundwater concentrations in the well, in conjunction with the consistency of the groundwater flow direction and historic groundwater contaminant concentrations in downgradient wells (especially C-15) emphasizes that the length of the contaminant plume has not been defined. The Regional Water Quality Control Boards (RWQCBs) Environmental Screening Levels (ESL) for Total Petroleum Hydrocarbons as gasoline (TPHg) for groundwater is 100 micrograms per liter ($\mu\text{g}/\text{l}$), and for fresh water aquatic habitat is 500 $\mu\text{g}/\text{l}$ TPHg. Well C-15, which is appears to be lateral to the apparent principal plume migration path (downgradient of well C-9), contained 520 $\mu\text{g}/\text{l}$ TPHg in the last sampling event (July 2008) before the well was destroyed. Similar concentrations were detected throughout the life of the well, with spikes up to 1,000 $\mu\text{g}/\text{l}$ TPHg, at this lateral position. With the presence of Crow Creek, at a distance of approximately 375 feet from the release, and approximately 50 feet downgradient of well C-15, groundwater TPHg concentrations in the primary plume migration path may present a risk to ecological receptors.

Consequently, ACEH requests, by the date identified below, a groundwater monitoring well work plan for the installation of sufficient groundwater monitoring wells to define the groundwater contaminant plume downgradient of C-9 in order to determine if the level of protection of Crow Creek is sufficient.

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:

- **January 20, 2014** – Groundwater Monitoring Well Work Plan
File to be named: RO350_WP_L_yyyy-mm-dd
- **February 21, 2014** – First DPE / SVE Post Implementation Quarterly Groundwater Monitoring and Well Installation Report; File to be named: RO350_GWM_R_yyyy-mm-dd
- **30 Days After DPE System Start Up** – First DPE System Remedial Progress Report and As-Built Documentation; File to be named: RO350_REM_R_yyyy-mm-dd
- **TBD** – Quarterly Groundwater Monitoring
File to be named: RO350_GWM_R_yyyy-mm-dd
- **TBD** – Monthly DPE System Remedial Progress Reports
File to be named: RO350_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

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

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

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

cc: Brandon Wilken, 5900 Hollis Street, Suite A, Emeryville, CA 94608
(sent via electronic mail to bwilken@croworld.com)

Judy Gilbert, Conestoga-Rovers & Assoc., 5900 Hollis Street, Suite A, Emeryville, CA 94608;
(sent via electronic mail to: jjgilbert@CRAworld.com)

Dilan Roe (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/DATA REQUESTS

These reports/data are being requested pursuant to Division 7 of the California Water Code (Water Quality), Chapter 6.7 of Division 20 of the California Health and Safety Code (Underground Storage of Hazardous Substances), and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations (Underground Storage Tank Regulations).

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (Local Oversight Program [LOP] for unauthorized releases from petroleum Underground Storage Tanks [USTs], and Site Cleanup Program [SCP] for unauthorized releases of non-petroleum hazardous substances) require submission of reports in electronic format pursuant to Chapter 3 of Division 7, Sections 13195 and 13197.5 of the California Water Code, and Chapter 30, Articles 1 and 2, Sections 3890 to 3895 of Division 3 of Title 23 of the California Code of Regulations (23 CCR). Instructions for submission of electronic documents to the ACEH FTP site are provided on the attached "Electronic Report Upload Instructions."

Submission of reports to the ACEH FTP site is in addition to requirements for electronic submittal of information (ESI) to the State Water Resources Control Board's (SWRCB) Geotracker website. In April 2001, the SWRCB adopted 23 CCR, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1 (Electronic Submission of Laboratory Data for UST Reports). Article 12 required electronic submittal of analytical laboratory data submitted in a report to a regulatory agency (effective September 1, 2001), and surveyed locations (latitude, longitude and elevation) of groundwater monitoring wells (effective January 1, 2002) in Electronic Deliverable Format (EDF) to Geotracker. Article 12 was subsequently repealed in 2004 and replaced with Article 30 (Electronic Submittal of Information) which expanded the ESI requirements to include electronic submittal of any report or data required by a regulatory agency from a cleanup site. The expanded ESI submittal requirements for petroleum UST sites subject to the requirements of 23 CCR, Division, 3, Chapter 16, Article 11, became effective December 16, 2004. All other electronic submittals required pursuant to Chapter 30 became effective January 1, 2005. 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, 7835, 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, late 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 SCP)	REVISION DATE: July 25, 2012
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (petroleum UST and SCP) 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.