



ENVIRONMENTAL HEALTH DEPARTMENT
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
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FAX (510) 337-9335

May 13, 2016

Ms. Carryl MacLeod
Chevron Environmental Management Company
6101 Bollinger Canyon Road
San Ramon, CA 94583
(sent via electronic mail to:
cmacleod@chevron.com)

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

Subject: Quarterly Rebound Groundwater Monitoring and Work Plan Request; Fuel Leak Case No. RO0000350 and GeoTracker Global ID T0600100344, Chevron #9-5607, 5269 Crow Canyon Road, Castro Valley, CA 94552

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

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *First Quarter 2016 Groundwater Monitoring and Sampling Report*, dated April 7, 2016, and the *Monthly Remedial Progress and System Shut-Down Report – February and March 2016*, dated April 27, 2016. The reports were prepared and submitted on your behalf by GHD Services, Inc (GHD). Thank you for submitting the reports.

The Soil Vapor Extraction System (SVE) and Groundwater Extraction and Treatment System (GWET) were shut down on March 15, 2016 due to low vapor mass removal rates between January and March 2016, and because the system was operational for slightly over one year as stated in the State Water Board's Low Threat Closure Policy (LTCP). ACDEH acknowledges the operational period; however, observes a direct correlation between high groundwater levels and low rates of extraction, and elevated rates of extraction and low groundwater levels. It thus appears that the system is substantially more effective during selected periods of the year, than during the January to March 2016 time period when water levels were high. ACDEH accepts that the GWET and SVE systems will affect depth to water measurements; however, with all extraction rates being equal, the apparent lower rates of groundwater inflow during dryer seasons appear to allow a higher rate of capture, removal, and lowering of groundwater. ACDEH also notes that vapor mass removal rates during low groundwater periods do not show a significant rate of decline and are as high as immediately after system startup (see for example mass removal rates between September and October 27, 2014 and between December 2, 2015 and January 5, 2016, immediately before the cited time period). It appears substantial hydrocarbon contamination remains beneath the site. Conversely, ACDEH recognizes that rebound testing has the potential to indicate that sufficient hydrocarbon mass removal has occurred, and that the LTCP would potentially indicate closure of the site may be appropriate. However, please note that this does not consider ecologic receptors in Crow Creek as discussed below.

ACDEH has previously evaluated site data to determine if the site is eligible for closure as a low risk site under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on ACDEH staff review, we have determined that the site fails to meet the LTCP Media-Specific Criteria for Groundwater and the Media-Specific Criteria for Vapor Intrusion to Indoor Air.

Based on the review of the case file ACDEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

- 1. Quarterly Rebound Groundwater Monitoring** – Based on the March 15, 2016, system shut down, ACDEH is in agreement that it appears appropriate to conduct quarterly groundwater monitoring events to monitor potential groundwater concentration rebound. Two quarters of groundwater monitoring were proposed;

however, it may be appropriate to determine groundwater contaminant trends at the site for a slightly longer period due to potentially substantial changes in groundwater elevation, and due to fresh water ecologic receptors in Crow Creek. Please recall that once groundwater leaves the groundwater system and enters surface waters, ecologic cleanup goals are appropriate (Environmental Screening Levels [ESLs] or other). Please submit quarterly reports by the dates identified below.

2. **Dilution – Attenuation Analysis** – It appears appropriate to request a dilution – attenuation analysis of groundwater contaminant trends between well C-9 and Crow Creek in order to determine estimated contaminant concentrations at the potential point of discharge to Crow Creek and exposure to ecologic receptors. Please ensure that groundwater concentration spikes such as observed in well C-9 in July 2014 are captured in the analysis. Please submit the analysis, including worksheets, with the work plan requested below.
3. **Soil Vapor Work Plan** – In order to determine the effect of the SVE and GWET systems on the elevated soil vapor at the site, it appears appropriate to conduct another round of soil vapor sampling at the site. Please submit a work plan, using standard protocols, to resample existing vapor wells by the date identified below.

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:

- **July 15, 2016** – Second Quarter 2016 Groundwater Monitoring Report
File to be named: RO350_GWM_R_yyyy-mm-dd
- **July 29, 2016** – Work Plan
File to be named: RO350_WP_R_yyyy-mm-dd
- **October 21, 2016** – Third Quarter 2016 Groundwater Monitoring Report
File to be named: RO350_GWM_R_yyyy-mm-dd
- **January 27, 2017** – Fourth Quarter 2016 Groundwater Monitoring Report
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 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, or in the list of cc's listed below, ACDEH is requesting your email address to help expedite communications and to help lower overall costs.

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 Detterman, PG, CEG
Senior Hazardous Materials Specialist

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

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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, ACDEH, (Sent via E-mail to: dilan.roe@acgov.org)

Mark Detterman, ACDEH, (Sent via electronic mail to mark.detterman@acgov.org)
Geotracker, Electronic Files

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.