

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

August 17, 2018

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

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

Subject: Meeting Followup; 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:

Thank you for joining Alameda County Department of Environmental Health (ACDEH) staff in a conference call on July 20, 2018. In conjunction with the conference call, ACDEH has reviewed the case file including the *Soil Vapor Sampling Report*, dated June 21, 2018, and the *Fourth and First Quarter 2018 Groundwater Monitoring and Sampling Report*, dated March 27, 2018. The report was prepared and submitted on your behalf by GHD Services, Inc (GHD). Thank you also for submitting the report.

As discussed in the meeting, the referenced report documented in installation of VP-11 and VP-12 due to the inability to resample existing vapor wells VP-3 and VP-6, installed at the former location of two product dispense islands. The analytical results appear to indicate that soil vapor in the vicinity of the two former dispenser islands meets one of the Criterias of the Low Threat Closure policy (LTCP), as do other areas of the site and vicinity. Therefore, ACDEH has reevaluated the data and recommendations presented in the above-mentioned reports, in conjunction with the case files, and the State Water Resources Control Board's (SWRCBs) LTCP. Based on ACDEH staff review, we have determined that sufficient data has been collected to document that the only remaining Criteria that the site fails to meet, is the LTCP Media-Specific Criteria for Groundwater (see Geotracker).

Based on ACDEH staff review of the case file, and the discussions in the July 20, 2018 conference call, we request that you address the following technical comments and send us the reports requested below.

### **TECHNICAL COMMENTS**

- 1. Vapor Intrusion Risk** – As discussed in the meeting, ACDEH requests the screening of flooded vapor wells VP-3 and VP-6 with a Photoionization Detector (PID) in order to determine the continued presence, or absence, of hydrocarbon vapors in the wells.
- 2. Eco-Toxicity and Dilution Attenuation Analysis** – As also discussed in the meeting, ACDEH is placing, at a minimum, a temporary hold on this request, in lieu of the following request.
- 3. Corrective Action Plan** - In an effort to move the case towards closure, and as discussed in the conference call of July 20, 2018, ACDEH requests the submittal of a limited Feasibility Study / Corrective Action Plan (FS/CAP) to substantially decrease residual groundwater contamination as documented by wells C-9 and C-17. Please prepare a Draft Corrective Action Plan (Draft CAP) that meets the provisions of section 2725 of the UST regulations (CCR, Title 23, Chapter 16, section 2600, et seq.) and includes the following minimum information:
  - Proposed cleanup goals and the basis for cleanup goals.
  - Brief summary of site characterization data.
  - Receptor information, including sensitive receptors, and potential groundwater receptors.
  - Evaluation of a minimum of three active remedial alternatives including discussion of feasibility, cost effectiveness, estimated time to reach cleanup goals, and limitations for each remedial alternative.

- Detailed description of proposed remediation including confirmation sampling and monitoring during implementation.
- Post-remediation rebound monitoring.
- Schedule for implementation of cleanup.

Public participation is a requirement for the Corrective Action Plan process. Therefore, we request that you submit a Draft CAP for ACDEH review. Upon ACDEH approval of a Draft CAP, ACDEH will notify potentially affected members of the public who live or own property in the surrounding area of the proposed remediation described in the Draft CAP. An example draft public notification flyer will be forwarded under separate cover for modification for the site. Public comments on the proposed remediation will be accepted for a 30-day period.

- 4. Semi-Annual Groundwater Monitoring** – It appears appropriate continue groundwater monitoring and sampling on a semi-annual basis. Please sample site wells in the months of January and July. Please submit groundwater monitoring and sampling reports by the dates identified below. This schedule may be revised based on appropriate monitoring intervals required for Comment 3 above.

#### **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](mailto: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** – Second 2018 Semi-Annual Groundwater Monitoring Report  
File to be named: RO350\_GWM\_R\_yyyy-mm-dd
- **October 12, 2018** – Draft Corrective Action Plan  
File to be named: RO350\_CAP\_R\_yyyy-mm-dd
- **March 26, 2019** – First 2019 Semi-Annual 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](mailto: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

Ms. MacLeod, and Mr. and Ms. Hinkley  
RO0000350  
August 17, 2018, Page 3

cc: Katherine Szymanowski, ARCADIS, Inc, 2300 Clayton Road, Suite 400, Concord, CA 94520; (Sent via electronic mail to: [Katherine.Szymanowski@arcadis.com](mailto:Katherine.Szymanowski@arcadis.com))

Dilan Roe, ACDEH, (Sent via electronic mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))

Paresh Khatri, ACDEH; (Sent via electronic mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org))

Mark Detterman, ACDEH, (Sent via electronic mail to: [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))

Electronic File; GeoTracker

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> December 14, 2017
	<b>ISSUE DATE:</b> July 25, 2012
	<b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016
<b>SECTION:</b> ACDEH Procedures	<b>SUBJECT:</b> 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/](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 values<sup>1</sup> 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
<b>2016 Subsurface Investigation Report</b>	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
<b>2012 Site Assessment Work Plan</b>	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>2010 GW Investigation Report</b>	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	✓	✓	✓	✓	✓

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

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> NA
	<b>ISSUE DATE:</b> December 14, 2017
	<b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016
<b>SECTION:</b> ACDEH Procedures	<b>SUBJECT:</b> 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/](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.