



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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April 8, 2014

Ms. Jennifer Sedlachek (*Sent via E-mail to: jennifer.c.sedlachek@exxonmobil.com*)
Exxon Mobil
4096 Piedmont, #194
Oakland, CA 94611

Mr. Steve Asmann
Steve's Valero
2991 Hopyard Road
Pleasanton, CA 94566

Mr. Bruce Morrison
Kirk D. Morrison Trust et al.
224 Woodward Avenue
Sausalito, CA 90623-1066

Subject: Case File Review for Fuel Leak Case No. RO0000362 and GeoTracker Global ID No. T0600100537, Valero #3823, 2991 Hopyard Road, Pleasanton, CA 94566

Dear Ms. Sedlacheck, Mr. Asmann, and Mr. Morrison:

In correspondence dated March 22, 2012, the State Water Resources Control Board Underground Storage Tank Cleanup Fund (USTCF) recommended that ACEH consider this site for case closure. ACEH disagreed with the USTCF recommendation at that time. The site was placed on the USTCF closure list which prohibited ACEH from providing directives for further action at the site. On November 4, 2013, the USTCF prepared a Closure Review Summary Report which provided responses to ACEH objections to closure and indicated that the Fund Manager determined that case closure was appropriate.

A Notice of Opportunity for Public Comment was distributed by the USTCF on November 4, 2013. In response to the public notice, ACEH and the Alameda County Flood Control and Water Conservation District Zone 7 agency submitted comments objecting to the case closure. Comments objecting to case closure were also submitted by the San Francisco Bay Regional Water Quality Control Board. On March 12, 2014, the USTCF sent out a Third Review Summary Report – Additional Work. Based on this Third Review Summary Report, the USTCF is not closing the case at this time and ACEH will again provide regulatory directives.

This correspondence presents several technical comments that need to be addressed to advance this case. These technical comments are based on ACEH review of the case file along with consideration of technical comments received from Zone 7 and the San Francisco Bay Regional Water Quality Control Board. We request that you prepare a Work Plan for sampling of City of Pleasanton Well No.7 to address technical comment 1, immediately resume groundwater monitoring to address technical comment 2, and prepare an updated conceptual site model to address technical comment 3. Further details are provided in the technical comments below.

TECHNICAL COMMENTS

- 1. Sampling of Pleasanton Well No. 7.** The nearest water supply well is the City of Pleasanton Municipal Well No. 7, which is located approximately 250 feet northwest of the site. City of Pleasanton Municipal Well No. 7 is not currently in use but potentially could be used in the future. The well is perforated between depths of 120 to 440 feet bgs. Monitoring well MW-8, which is located at the downgradient edge of the site, is screened from 118 to 133 feet bgs. During the last groundwater monitoring event in June 2013, MTBE was detected at concentrations above water quality criteria. MTBE had not been detected in groundwater from MW-8 at concentrations above the reporting limit prior to June 2013. These results indicate that petroleum hydrocarbons have migrated downward to the portion of the aquifer that provides water to City of Pleasanton Municipal Well No. 7. The increase in MTBE concentrations may be related to Hopyard Well No. 6 between April 2012 and October 2012, which lowered water levels across the site by approximately 10 feet and created a downward vertical gradient. In order to assess whether MTBE and other petroleum hydrocarbons have reached City of Pleasanton Well No. 7, we request that you submit a Work Plan to conduct depth-discrete sampling within the well. City of Pleasanton Well No. 7 has an 18-inch casing diameter and a sounding tube with a diameter of 3 inches that can be used for sampling. The City of Pleasanton has been contacted by ACEH and appears to be willing to cooperate with sampling of the water supply well. Please submit the Work Plan no later than May 7, 2014. Please include plans to continue sampling of City of Pleasanton Well No. 7 if pumping of the well is initiated.
- 2. Groundwater Monitoring.** The most recent groundwater sampling event appears to be the June 2013 sampling event. Groundwater monitoring was discontinued following an evaluation by the USTCF that recommended case closure. ACEH now requests that groundwater sampling be resumed within 30 days of this letter and a report submitted no later than June 17, 2014. All of the wells sampled during June 2013 and well VR2 are to be sampled during this next event. A schedule for future groundwater monitoring is to be established pending the results from depth-discrete sampling of City of Pleasanton Well No. 7 and any future plans for pumping of the water supply well.
- 3. Updated Conceptual Site Model.** We request that the groundwater monitoring results be incorporated into an updated conceptual site model (CSM). The updated CSM is to focus on the mass and mobility of the residual migration and the potential for downward migration of contamination into the lower zones of the aquifer that provide water to City of Pleasanton Municipal Well No. 7.
- 4. Integrity of Monitoring Wells.** In the "*Response to Alameda County Comments*," prepared by the USTCF (attached), removal of the monitoring wells is recommended to seal vertical conduits and reduce the likelihood of future vertical migration. In the SCM requested above, please review available historical data to discuss the integrity of the existing monitoring wells and the potential for the wells to be vertical conduits.

TECHNICAL REPORT REQUEST

Please submit technical reports to the Alameda County Environmental Health ftp site using the designations indicated below according to the following schedule:

- **May 7, 2014** – Work Plan for Sampling of City of Pleasanton Well #7
File to be named: WP_R_YYYY-mm-dd RO362
- **June 17, 2014** – Groundwater Monitoring Report
File to be named: GWM_R_YYYY-mm-dd RO362
- **June 17, 2014** – Updated Site Conceptual Model
File to be named: SCM_R_YYYY-mm-dd RO362

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org. Case files can be reviewed online at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address does not appear on the cover page of this notification ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Attachments: State Water Resources Control Board Response to Comments
Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Danielle Stefani, Livermore Pleasanton Fire Department, 3560 Nevada St, Pleasanton, CA 94566 (Sent via E-mail to: dstefani@lpfire.org)

Colleen Winey (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551 (Sent via E-mail to: cwiney@zone7water.com)

Cleet Carlton, San Francisco Bay Regional Water Quality Control Board, 1515 Clay Street, Suite 1400, Oakland, CA 94612 (Sent via E-mail to: ccarlton@waterboards.ca.gov)

Abbas Masjedi, City of Pleasanton, P.O. Box 520, Pleasanton, CA 94566-0802 (Sent via E-mail to: amasjedi@ci.pleasanton.ca.us)

Responsible Parties
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Susan Clough, City of Pleasanton, (*Sent via E-mail to: sclough@ci.pleasanton.ca.us*)

Rebekah Westrup, Cardno ERI, 601 N McDowell Boulevard, Petaluma, CA 94954 (*Sent via E-mail to: rebekah.westrup@cardno.com*)

Dilan Roe, ACEH (*Sent via E-mail to: dilan.roe@acgov.org*)

Jerry Wickham, ACEH (*Sent via E-mail to: jerry.wickham@acgov.org*)

GeoTracker, eFile

Response to Alameda County Comments
For Valero #3823 CUF Claim 5330

Comment 1: (a.) The nearest water supply well is the inactive City of Pleasanton Municipal Well No.7, which is located approximately 250 feet northwest of the Site. (b.) Zone 7 Hopyard Well #9 is located approximately 950 northeast of the Site. (c.) Zone 7 Hopyard Well #6 is located approximately 1,400 feet northwest of the Site. Pumping of approximately 5 million gallons per day was initiated from Hopyard #6 in April 2012 causing local groundwater elevations to drop approximately 10 feet indicating the saturated zones are hydraulically connected. The pumping stopped in December 2012 and the groundwater elevations rebounded approximately 6 feet.

Response 1:

1a. Although referenced, no record of this well can be found in the California Department of Public Health well permitting database. In addition, no visual confirmation of this well was found in areal or street view photography. However, the subject case meets the Low Threat Closure Policy Groundwater-Specific Criteria as Class 1 which requires supply wells to be a minimum 250 feet away.

1b. Zone 7 Hopyard Well #9 is located approximately 950 northeast of the Site well outside the 250 feet distance required by the Policy.

1c. Zone 7 Hopyard Well #6 is located approximately 1,400 feet northwest of the Site well outside the 250 foot distance required by the Policy. This well is screened at similar depths to the screened interval in monitoring well MW-8. The fact that the shallow and deeper aquifers are in hydraulic connection reinforces the argument that the subject site be closed and the wells on site be properly destroyed in order to protect the deeper producing aquifers. Extending the life of onsite monitoring wells only prolongs the potential conduit for downward migration of the minor residual petroleum hydrocarbons.

Comment 2: Affected Groundwater

During the groundwater sampling event in June 2013, MTBE was detected in groundwater from monitoring well MW-8 at concentrations ranging from 13 to 39 micrograms per liter. Monitoring well MW-8 is screened from 118 to 132 feet below ground surface and the City of Pleasanton Well #7 and Hopyard Well #6 are screened in a similar interval.

Response 2: The analytical results of 13 and 39 micrograms are from duplicate samples not an increasing trend just laboratory reporting noise. Again closing the site and properly destroying the monitoring wells will eliminate the potential conduits for further downward migration.

Comment 3: Plume Stability

The Notice states the remaining “petroleum hydrocarbon constituents are limited, stable, and concentrations are decreasing”.

Response 3: The historical groundwater data from monitoring wells demonstrate that fluctuations in groundwater concentrations do vary between times when the remediation system operated and non-operation as would be expected. The responsible party has removed 1,900

cubic yards of affected soil and extracted, conducted vapor extraction and treated 13 million gallons of affected groundwater. The residual petroleum hydrocarbons in the soil and groundwater at the site have reached concentrations below the technical and economical limits of remediation equipment.

Comment 4: Groundwater Trends

- a.) The Notice includes three graphs of MTBE concentrations in the section entitled, "Groundwater Trends". None of the graphs are valid representations of concentration trends for the Site. The graph for well VR 2 shows MTBE concentrations from December 2008 until October 2012. The groundwater extraction system was operating during this entire time period. Plotting a trend line through this shortened period of time for well VR-2 to represent long-term groundwater concentrations for the Site is misleading.
- b.) The graph for PMW-4 shows one value of 0.5 µg/L for MTBE on March 4, 2009 and eight zero values for the following time period.
- c.) As in Comment 4b. the graph uses estimated values and zero's for other points.

Response 4:

- a.) The final closure summary will have the entire concentration history for VR-2 plotted.
- b.) The data plotted is what was uploaded into GeoTracker and then plotted by GeoTracker. Both 0.5 µg/L and zero are well below the water quality objective of 5 µg/L.
- c.) The data plotted is what was uploaded into GeoTracker and then plotted by GeoTracker. All data in question are below water quality objectives.

Comment 5: MTBE was not detected in groundwater monitoring well MW-8 at concentrations above water quality criteria until the most recent sampling event in June 2013. The increase in MTBE concentrations may have been caused by the pumping of Hopyard #6 which lowered water levels across the site and created a downward vertical gradient.

Response 5: We agree the downward migration was caused by the pumping of the Hopyard #6 well. Removing the monitoring wells and sealing the vertical conduits at the Site will significantly reduce the likelihood of future vertical migration.

Comment 6: The Notice indicates that the Site meets Scenario 1 of the Groundwater-Specific Criteria in the Low Threat Closure Policy. Please see the table below, which compares site data to the LTCP groundwater criteria. As shown on the table, does not meet any of the LTCP scenarios.

Response 6: The plume length is less than 100 in length, no free product exists and the nearest supply well is greater than 250 feet away, therefore, the Site meets Groundwater-Specific Criteria, Class 1.

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 .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 <://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 .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.