## Nowell, Keith, Env. Health

To: TimBishop@chevron.com

Cc: Katherine.Brandt@arcadis-us.com; AFischer@Chevron.com; Roe, Dilan, Env. Health

Subject: Fuel Leak Case RO366 - Unocal #3292, 15008 East 14th St., San Leandro

Dear Mr. Bishop,

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including the document entitled *Conceptual Site Model and Closure Request* (RFC), dated March 29, 2013, prepared by ARCADIS U.S., Inc. (ARCADIS) for the referenced site on your behalf, and the case file for adjacent fuel leak sites including (former) Chevron Station #9-2013, located at 15002 Hesperian Blvd., ACEH case file RO0000950, and the former Mobil Station located at 14994 East 14th St., ACEH case file RO000042. The RFC document was prepared in order to evaluate the site for case closure under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). The RFC indicates the LTCP criteria have been met and recommends that a determination of case closure be made. ACEH does not concur with the request for closure at this time as described below.

ACEH has evaluated the data and recommendations presented in the above-mentioned RFC report and documents from adjacent fuel leak sites in conjunction with the case files, and the LTCP and concurs that the site may be closable. However, it has not been demonstrated that down gradient irrigation wells, potentially located within 250 feet from the site, are protected from the releases of the comingled total petroleum hydrocarbons as gasoline (TPHg) plume. There are discrepancies between the well surveys for Unocal #3292 and Chevron #9-2013 that need to be addressed. ACEH would like to schedule a meeting in January 2014 to discuss the SCM, the comingled plume, and the evaluation of the TPHg plume with respect to down gradient irrigation wells presented in the RFC. Please provide ACEH several dates and times during which a meeting can be scheduled. ACEH staff will select dates and times from your list to arrange the meeting. Please provide the list of available dates and times by December 31, 2013, by email, addressed to keith.nowell@acgov.org and cc'ing Dilan Roe at dilan.roe@acgov.org.

Thank you for your cooperation. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at <a href="mailto:keith.nowell@acgov.org">keith.nowell@acgov.org</a>.

Sincerely, Keith Nowell,

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PDF copies of case files can be reviewed/downloaded at:

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