

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**  
AGENCY  
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

October 1, 2008

Ms. Staci Frerichs  
Chevron Environmental Management  
6001 Bollinger Canyon Rd K2256  
PO Box 6012  
San Ramon, CA 94583-2324

Mr. Harv Dhaliwal  
G & S Associates Inc.  
4430 Deerfield Way  
Danville, CA 94506

Mr. Bhushan Bansal  
Bansal Inc.  
1784 150<sup>th</sup> Street  
San Leandro, CA 94578-1826

Equilon Enterprises LLC  
c/o Stewart Title Co  
1980 Post Boulevard  
Houston, TX 77056

Subject: Fuel Leak Case No. RO0000368 (Global ID # T0600100303), Chevron #9-8139, 16304 Foothill Blvd., San Leandro, CA 94587

Dear Ms. Frerichs, Mr. Harv Dhaliwal, Mr. Bhushan Bansal and Equilon Enterprises:

Alameda County Environmental Health (ACEH) staff have reviewed the case file for the above referenced site and the document entitled "Subsurface Investigation Report and Well Destruction Workplan," received February 1, 2008 and prepared by Conestoga Rovers Associates (CRA). Results from the subsurface investigation indicate that residual petroleum hydrocarbon contamination was discovered in soil and groundwater at a depth of up to 45 feet bgs; TPHg, benzene and MtBE were detected in groundwater at 45 feet bgs at concentrations of up to 11,000 µg/l, 48 µg/l and 6,100 µg/l, respectively. The high concentrations of TPHg and MtBE in groundwater at 45 feet bgs indicate that the vertical extent of contamination is undefined beneath your site. In addition, CRA recommends the decommissioning of five downgradient monitoring wells; wells MW-8, MW-9 and MW-10 are located in high traffic areas are considered a safety hazard, while wells MW-11 and MW-13 were removed from monitoring in 2005.

Furthermore, CRA proposed the installation a soil boring in the former tank pit to assess the extent of soil and groundwater contamination at this location (revised work plan submitted in May 2006, approved by ACEH in August 2006). To date we have not received verification that the proposed soil boring has been installed. Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to [mail to: steven.plunkett@acgov.org](mailto:mail:steven.plunkett@acgov.org)) prior to the start of field activities.

**TECHNICAL COMMENTS**

1. **Subsurface Investigation Results.** Results from the subsurface investigation completed in February 2008 indicate that residual contamination remains in place in soil and groundwater beneath your site. Of particular concern are the high levels of dissolved phase TPHg and MtBE detected in groundwater at a depth of 32 feet bgs at concentrations up to 13,000 µg/l TPHg, and 49,000 µg/l MtBE. In addition, TPHg and MtBE were also detected in groundwater at 45 feet bgs at concentrations of up to 11,000 µg/l and 6,100 µg/l, respectively.

These data indicate a significant source of residual contamination remains in place beneath the former UST tank pit.

CRA states that due to the presence of elevated levels of dissolved phase hydrocarbon contamination detected during depth discrete groundwater sampling at 45 feet bgs, the vertical extent of contamination in groundwater remains undefined. Therefore, due to the high concentrations of TPHg and MtBE at depths of up to 45 feet bgs, ACEH requires additional onsite and offsite characterization. We recommend the installation of CMT wells or well clusters to monitor the discrete hydrogeologic zones identified during the investigation. We request that you prepare a work plan to evaluate the deeper water bearing zones beneath and downgradient of your site. Please submit the work plan according to the schedule outlined below.

2. **Source Area Characterization.** High levels of dissolved phase contamination were detected in former monitoring well MW-3 (decommissioned in 1996) at concentrations of up to 37,000 µg/l TPHg, 12,000 µg/l benzene and 13,000 µg/l MtBE. To evaluate residual contamination in the source area, ACEH requested additional site characterization beneath the former tank pit. However, during our review of the investigation report submitted in February 2008 ACEH noted that CRA did not complete the installation of the proposed soil boring in the source area, beneath the former tank pit. As a result, we request that you complete the scope of work as proposed in the work plan. Please present the results from the soil boring installation in the soil and groundwater investigation report requested below.
3. **Proposed Monitoring Well Decommissioning.** CRA has proposed the decommissioning of five offsite monitoring wells; MW-8, MW-9, MW-10, MW-11 and MW-13. ACEH agrees with the removal of monitoring wells MW-9 and MW-10, which are located in Foothill Boulevard and pose a safety hazard. However, we do not agree with the removal of well MW-8, which continues to exhibit high dissolved phase contamination, and is an important location needed to monitor the dissolved phase plume. We recommend changing the sampling frequency for MW-8 from quarterly to annually. In addition, CRA proposes the removal of monitoring wells MW-11 and MW-13. ACEH concurs with the decommissioning of wells MW-11 and MW-13. Please present the results from the well decommissioning in the soil and groundwater investigation report requested below.

### TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Steven Plunkett), according to the following schedule:

- **December 21, 2008** – Work Plan
- **March 30, 2009** – Soil and Groundwater Investigation Report

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.swrcb.ca.gov/ust/electronic\\_submittal/report\\_rqmts.shtml](http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml)).

**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**

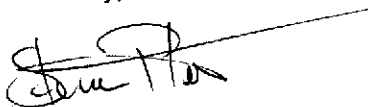
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

**AGENCY OVERSIGHT**

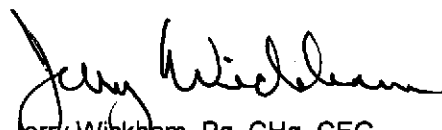
If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 383-1761 or send me an electronic mail message at [steven.plunkett@acgov.org](mailto:steven.plunkett@acgov.org).

Sincerely,



Steven Plunkett  
Hazardous Materials Specialist



Jerry Wickham, Pg, CHg, CEG  
Senior Hazardous Materials Specialist

Staci Frerichs, Harv Dhaliwal, Bhushan Bansal and Equilon Enterprises  
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RO0000368  
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cc: Laura Genin  
CRA  
5900 Hollis Street, Suite A  
Emeryville, CA 94608

Donna Drogos, ACEH, Steven Plunkett ACEH, File