

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
ALEX BRISCOE, Director



ENVIRONMENTAL HEALTH DEPARTMENT
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
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(510) 567-6700
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November 28, 2011

Mehdi and Fereshteh Mohammadian
Cal Gas
15595 Washington Ave
San Lorenzo, CA 94580

Mr. Ian Robb
Chevron Corporation
6111 Bollinger Canyon Rd. RM 3612
San Ramon, CA 94583-2324
(sent via electronic mail to:
IanRobb@chevron.com)

Ms Agnes Calleri
10901 Cliffland Dr.
Oakland, CA 94605

Ms. Marjorie Kayner
Burt Kubo Trust
20321 Via Espana
Salinas, CA 93908

Subject: Request for Site Investigation Work Plan; Fuel Leak Case No. RO0000374 and GeoTracker Global ID T06000101374, Chevron #21-1285 / Cal Gas, 15595 Washington Avenue, San Lorenzo, CA 94580

Dear Responsible Parties:

Alameda County Environmental Health (ACEH) staff has reviewed the case file, including the *Site Conceptual Model and Corrective Action Plan*, (SCM and CAP) dated August 20, 2007, a letter of response entitled *Cal Gas* dated April 29, 2009 (to a February 8, 2009 ACEH directive letter), and the *Second Semi-Annual of 2011 Groundwater Monitoring and Sampling*, report dated August 23, 2011. Each of the reports were generated and submitted on your behalf by Enviro Soil Tech Consultants (ESTC). Thank you for submitting the reports.

The February 8, 2009 ACEH letter and the April 29, 2009 response letter from ESTC extensively discussed and minutely argued the August 20, 2007 report submittal. In essence the two discuss differing views on release locations and therefore appropriate corrective actions. ESTC argues for a single release source associated with the first generation UST complex located south of the existing site building. ACEH may not disagree with a source at this location; however, believes the data also supports another release location near the second generation USTs east of the existing building. While the initial 1986 site investigation documents contamination near the dispenser islands east of the station building (near the then future second generation USTs), this has been presumed to be related to product lines associated with the first generation USTs. In contrast ACEH has noted that MTBE contamination appears to emanate from the location of the second generation USTs and notes that the first generation USTs were removed before increased and widespread use of MTBE. Consequently, and as a result of these conflicts in Site Conceptual Models (SCMs), ACEH judges it warranted to request a set of focused site investigations to resolve the differing SCMs.

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

TECHNICAL COMMENTS

- 1. Request for a Soil and Groundwater Work Plan** – It is noted that groundwater concentrations at the site have declined significantly with time at the site; however, based on the groundwater gradient maps generated for the site and vicinity since the installation of wells STMW-6 to STMW-10 (April 2007) a groundwater low or valley appears to extend across the site towards the southwest and the intersection of Via Enrico and Lorenzo Avenue. Releases at either UST complex would generally be expected to follow this flowpath in groundwater. This suggests that wells STMW-6 to STMW-10 are monitoring the lateral extent of a groundwater plume, rather than the downgradient direction of the plume as depicted in contaminant contour maps. While it is understood that bores have been previously proposed to investigate this area downgradient of the site, which were subsequently eliminated, it appears appropriate to investigate the flowpath depicted since 2007. To rapidly access this downgradient vicinity, ACEH requests this investigation to consist of a soil bore transect with soil and grab groundwater sample collection, with the subsequent installation of several wells to allow quick evaluation of verifiable groundwater contaminant concentrations.

ACEH also requests the installation of soil bores with soil and grab groundwater collection in two areas of the site. The installation of soil bores downgradient of existing soil bores SB-E and CPT-1 and upgradient of the station building would fill existing data gaps and isolate source locations, while the installation of soil bores in the vicinity of GP-4 would fill data gaps concerning the lateral extent of the proposed potential remedial overexcavation. While soil bore GP-4 documented the highest concentrations in soil at the site, it sits somewhat isolated from the soil plume and the lateral extent of a proposed remedial excavation is not defined. Defining the lateral limits of an excavation would allow better costing of this potential alternative. As a consequence, ACEH requests the submittal of a work plan to undertake these activities by the date referenced below.

- 2. Request for Preferential Pathway Survey** – This request is intended to reiterate and to modify a standing request through several directive letters, for a preferential pathway survey. ACEH does note that the request has been partially fulfilled with the submittal of a vicinity well survey; thank you for that submittal. However, because this is an area of San Lorenzo known to contain an above average number of residential / home irrigation wells, ACEH requests a door to door neighborhood canvas to preclude potential exposure to contaminants via “backyard” wells, such as the (known) well downgradient of the site at the southwest corner of Via Enrico and Lorenzo Avenue. From experience, these wells are both officially registered, and unregistered, and would not be known if unregistered.

At present, the closest known residential well is located across Via Enrico at a distance of approximately 185 feet from an onsite release point. The owner has discontinued use of the well, in part due to an ACEH request, but may want to resume use in the future. There are also several larger residential parcels in the local vicinity that may represent older ranch homes that predate suburbanization of the vicinity, and may contain older unaccounted irrigation wells. Additionally groundwater flow is to the southwest, directly toward Arroyo High School. While not known at this school, San Lorenzo schools are known to have made use of groundwater and have currently existing wells.

ACEH also reiterates the request for a site and vicinity utility survey, inclusive of utility laterals to the site, as these can allow onsite preferential migration of liquids in the vadose zone. Of importance in this survey are utility and lateral depths and location. We request that you perform a preferential pathway study that evaluates potential migration pathways and potential conduits (utilities, utility laterals, pipelines, foundational, and etc.) for lateral migration that may be present in the vicinity of the site.

Discuss your analysis and interpretation of the results of the preferential pathway study and report your results in the report requested below.

- a. Utility Survey** - An evaluation of all utility lines, utility laterals, and trenches (including sewers, storm drains, pipelines, trench backfill, foundation backfill, etc.) within and near the

site and plume area(s) is required as part of your study. Please reduce available information and maps, and generate appropriate (vicinity and / or site specific) maps and cross-sections illustrating the location and depth of all utility lines and trenches within and near the site and plume areas(s) as part of your study.

- b. Well Survey** - The door to door neighborhood canvas well survey is requested to include all parcels within an area a minimum of 800 feet downgradient to the west and southwest due to the presence of multiple flow directions depicted on site maps. The neighborhood canvas is not required to the north, east, or south of the site, based on flow directions. ACEH requests the submittal of tabulated results by parcel, address, contacted person, and results. ACEH can assist in generating a list of parcels and addresses.
- c. Residential Well Sampling** – For wells found during the neighborhood survey, ACEH requests the well be sampled for the analytical suite associated with this site. If a well cannot be sampled, ACEH requests the reason be determined and described.
- 3. Request for Point of Contact and Email Addresses** – If your email address is not listed on the first page of this letter, or in the list of cc's below, ACEH requests your email address to help expedite communications and to help lower overall costs. Please provide that information in your next submittal.

TECHNICAL REPORT REQUEST

Please submit the following deliverable to ACEH (Attention: Mark Detterman), according to the following schedule:

- **January 28, 2012** –Work Plan with Preferential Pathway Survey
- **60 Days After Work Plan Approval** – Soil and Groundwater Investigation Report, with residential well analytical data

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.

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

cc: Frank Hamedi-Fard, Enviro Soil Tech Consultants, 131 Tully Road, San Jose, CA 95111
(sent by electronic mail to info@envirosoiltech.com)

Donna Drogos, ACEH, (sent via electronic mail to donna.drogos@acgov.org)
Mark Detterman, ACEH, (sent via electronic mail to mark.detterman@acgov.org)
Geotracker, Case Electronic File

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: July 20, 2010
	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 (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.