



ENVIRONMENTAL HEALTH DEPARTMENT
ENVIRONMENTAL PROTECTION
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March 28, 2012

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 Work Plan Addendum and Conditional Approval of 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 *Additional Soil and Groundwater Investigation Work Plan*, dated January 24, 2012, generated and submitted on your behalf by Enviro Soil Tech Consultants (ESTC). Thank you for submitting the work plan.

Based on ACEH staff review of the referenced documents and of the case file we generally concur with the proposed scope of work, provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. Only the submittal of a revised Figure 2 (as a Work Plan Addendum) is requested, unless a larger alternate scope of work outside that described in the Work Plan and technical comments below is proposed.

We request that you address the following technical comments, incorporate them into the work, perform the proposed work, and send us the technical reports requested below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Proposed Scope of Work** – As requested by ACEH, there are approximately three principal proposed tasks of work at the site. ACEH has the following comments and requested modifications to the overall scope of work:
 - a. **Request for Preferential Pathway Survey** – ACEH has previously requested that this survey be included with the referenced work plan; however, ESTC indicates that this request could not be conducted, but will be upon receipt of funding from the USTCF. To clarify the intent of ACEH in regards to the utility mains and laterals portion of this request, as it was not explicitly stated in the previous directive letter, ACEH requests that future site plans continue to depict the location of the utilities in the site and vicinity.

- b. Offsite Bores** – Eight offsite Geoprobe soil bores are proposed for installation by the work plan. Five are proposed in a transect at the intersection of Lorenzo Avenue and Via Enrico and three are proposed for the space between two apartment buildings. Soil bores in the “intersection transect” are spaced at varying distances ranging between 30 to 40 feet. ACEH requests that soil bores in this transect be no more than 30 feet apart in order to capture potential lateral changes that may be present across this interval. Conversely, ACEH judges that the number of bores installed between the apartment buildings could be reduced to two and still provide sufficient data in that vicinity. ACEH requests a work plan addendum (a revised Figure 2) to document revised bore locations for both offsite areas of interest, by the date identified below.
 - c. Onsite Bores** – Six onsite Geoprobe soil bores are proposed for installation by the work plan. Two are located east of the station building, as generally requested by ACEH in the previous directive letter in an effort to fill a data gap in that location, and four are located around GP-4 to help determine the lateral extent of impacted soil around that bore, previously proposed as a remedial excavation. These bores are in general 12 to 15 feet from GP-4; however, the northerly soil bore in the GP-4 group is currently located 20 feet from GP-4. In order to more accurately delineate the potential lateral extent of contaminated soil around GP-4, ACEH requests that these four bores be located no further than 10 to 12 feet from bore GP-4, and that if significant contamination is encountered up to two additional step-out soil bores be installed at locations selected in concurrence with ACEH.
- 2. Work Procedures** – ACEH has the following comments and requested modifications to either proposed procedures and / or the resulting product:

 - a. Soil Bore Installation Protocols** – All soil bores are proposed to be installed to an approximate depth of 25 feet below grade surface (bgs). ACEH notes that the highest concentrations in soil bores GP-2 and GP-4 were at an apparent depth of 23 to 24 feet bgs, but decreased with further depth. As a consequence, ACEH requests that the vertical extent of contaminated soil be defined in all bores. This may require that some bores are installed slightly deeper than currently proposed.
 - b. Soil and Well Log Procedures** - Only to preclude miscommunication and to clarify the soil and well logging procedures, ACEH requests that PID readings, soil moisture observations, and first and final (stabilized) groundwater measurements be included on the resulting bore or well logs. These have sporadically been present on previous bore logs, and while these may not have been requested at the time of previous bore installations, these are requested for the proposed work at the site.
 - c. Soil Sample Selection Procedures** - The work plan proposes to collect and retain for laboratory analysis soil samples at 5-foot intervals or at shorter intervals if soil contamination is observed. In general ACEH concurs with this approach; however, requests that soil samples also be collected and retained for laboratory analysis at significant changes in lithology, at signs of contamination such as discolored soil, odor, or detectable PID results, and just above first encountered groundwater.
 - d. Well Locations and Installation Procedures** – The proposal deferred selecting the location of future monitoring wells until the results of the soil bore program were available and proposed discussing those locations with ACEH, but did provide a generalized description well construction techniques. ACEH is in agreement that incorporating additional data into a well placement procedure will be beneficial; however, has the following comments on the well construction details:

 - i. Well Screen Length** - The work plan proposed well screens approximately 15 feet in length, in general conformance with well screen lengths as installed in 2006 (between 6 or 7, and 22 feet bgs). ACEH generally requires shorter screen intervals in order to collect more representative groundwater samples, generally with no more than a 5 foot

sand interval. ACEH requests an effort to minimize the screen length at each well location to the extent possible, with well screens no longer than 5 feet. If longer screen intervals are judged appropriate single water-bearing zone well clusters or multilevel wells (similar to CMT) may be appropriate. These details can be addressed prior to well installation, and can incorporate data generated during soil bore installation.

- 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:

- **April 27, 2012** – Work Plan Addendum (revised Figure 2)
- **60 Days After Work Plan Addendum Approval** – Soil and Groundwater Investigation Report, with Preferential Pathway Survey and 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 Hamed-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.