



February 8, 2018

Mr. David Patten  
Chevron Environmental Management Co.  
6101 Bollinger Canyon Rd.  
San Ramon, CA 94583  
(Sent via electronic mail to: [drpatten@chevron.com](mailto:drpatten@chevron.com))

Loi Van Le & Josephine N. Le  
4265 Foothill Blvd.  
Oakland, CA 94601

Subject: Modified Work Plan Addendum Approval; Fuel Leak Case No. RO0000427 and GeoTracker Global ID T0600100339, Chevron #9-0076, 4265 Foothill Blvd, Oakland, CA 94601

Dear Mr. Patten and Mr. and Ms. Le:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file for the above referenced site including the *Second Quarter 2017 Groundwater Monitoring and Sampling Report*, dated December 15, 2017, and the *Soil Vapor Intrusion Assessment*, also dated December 15, 2017. The referenced vapor intrusion assessment report documented the installation of vapor well VP-7 and the unsuccessful sampling of the well due to the presence of water in sample tubing. The report also proposed three potential alternative sampling methods, including evacuation of sample tubing with a vacuum pump, failing that approach suggested blowing the water back down the tubing, and failing that approach, proposed the installation of an additional vapor well offsite on the adjacent parcel closer to the residential home with a basement that is the subject of the vapor intrusion concern.

Based on ACDEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org)) prior to the start of field activities.

### **TECHNICAL COMMENTS**

- 1. Modified Work Plan Addendum Approval** –The referenced investigation report and work plan addendum proposes actions with which ACDEH is in general agreement of undertaking; however, ACDEH requests several modifications to the approach. Please submit a report by the date specified below.
  - a. Alternative Soil Vapor Sampling** – Due to the lack of understanding of potential affects to vapor wells and surrounding sediments when under vacuum or pressure, ACDEH prefers an alternative approach to obtaining vapor sample results in proximity to the immediately adjacent offsite residential house with a basement. This includes two potential options:
    - i.** Halting the car wash for a weekend or two to attempt to clear near surface water from car washing operations, combined with vapor sampling on a Friday.
    - ii.** Alternatively the installation of an offsite vapor well or a sub-slab vapor pin in the basement may be beneficial in obtaining a vapor sample.
  - b. Potential Offsite Vapor Well Location** – Due to the location of somewhat elevated groundwater concentrations at well C-4, somewhat elevated analytical data at B-7, and the understanding that the basement in the residential house is at the southern end of the structure, it appears appropriate to move the potential offsite vapor well location closer to the southern end of the home in closer

proximity of data that indicates a potential vapor concern (well C-4 and bore B-7), and the basement, in parallel, and similar to, the location of a potential sub-slab vapor pin.

- c. Offsite Access** – To facilitate offsite access for the two offsite properties subject to potential vapor intrusion, ACDEH believes it is appropriate and beneficial to meet with both offsite property owners in conjunction with Chevron and its consultant. ACDEH's experience is that added communication from a governmental agency can assist in obtaining access to a property. ACDEH can additionally arrange to provide interpreters. Please forward contact information for both owners and notify ACDEH if car wash operations cannot be temporarily halted, by the date identified below.
- 2. Semi-Annual Groundwater Monitoring** – Please continue to conduct semi-annual groundwater monitoring at the subject site. Please submit groundwater monitoring reports by the date identified below.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACDEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention, and in Attachment 1, and schedule:

- **March 2, 2018** – Offsite Property Owner Contact Information  
Please email your caseworker
- **May 4, 2018** – Site Investigation Report and Updated Focused Site Conceptual Model  
File to be named RO427\_SWI\_R\_yyyy-mm-dd
- **May 25, 2018** – First Semi-Annual 2018 Groundwater Monitoring Report  
File to be named: RO427\_GWM\_R\_yyyy-mm-dd

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.

Online case files are available for review 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, ACDEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org).

Sincerely,



Mark E. Detterman, PG, CEG  
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations  
Electronic Report Upload (ftp) Instructions

cc: Kiersten Hoey, GHD, Inc., 5900 Hollis Street, Suite A, Emeryville, CA 94608  
(Sent via electronic mail to: [Kiersten.Hoey@ghd.com](mailto:Kiersten.Hoey@ghd.com))  
Greg Barclay, GHD, Inc., 5900 Hollis Street, Suite A, Emeryville, CA 94608  
(Sent via electronic mail to: [Greg.Barcly@ghd.com](mailto:Greg.Barcly@ghd.com))

Dilan Roe, ACDEH, (Sent via electronic mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))  
Paresh Khatri, ACDEH; (Sent via electronic mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org))

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Mark Detterman, ACDEH, (Sent via electronic mail to: [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))  
Electronic File; GeoTracker

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> December 14, 2017
	<b>ISSUE DATE:</b> July 25, 2012
	<b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016
<b>SECTION:</b> ACDEH Procedures	<b>SUBJECT:</b> Responsible Party(ies) Legal Requirements / Obligations

**REPORT & DELIVERABLE REQUESTS**

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO\_MAP, GEO\_XY, GEO\_Z, GEO\_BORE, GEO\_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/))

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values<sup>1</sup> as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

**GeoTracker Upload Table Example**

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
<b>2016 Subsurface Investigation Report</b>	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
<b>2012 Site Assessment Work Plan</b>	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>2010 GW Investigation Report</b>	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

<sup>1</sup> GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> NA
	<b>ISSUE DATE:</b> December 14, 2017
	<b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016
<b>SECTION:</b> ACDEH Procedures	<b>SUBJECT:</b> Responsible Party(ies) Legal Requirements / Obligations

**ACKNOWLEDGEMENT STATEMENT**

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

**PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS**

The California Business and Professions Code (Sections 6731, 6735, and 7835) 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 licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

**UNDERGROUND STORAGE TANK CLEANUP FUND**

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: [https://www.waterboards.ca.gov/water\\_issues/programs/ustcf/](https://www.waterboards.ca.gov/water_issues/programs/ustcf/)

**AGENCY OVERSIGHT**

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.