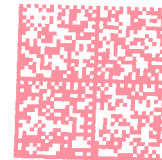





ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 1131 Harbor Bay Parkway, Suite 250
 Alameda, CA 94502-6577

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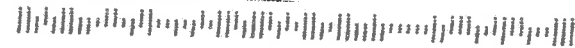
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Loi & Josephine Le
 Loi V Le et al.
 4265 Foothill Blvd.
 Oakland, CA 94601

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ENVIRONMENTAL HEALTH SERVICES
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(510) 567-6700
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July 26, 2016

Mr. Mark Horne
Chevron Environmental Management Co.
6101 Bollinger Canyon Rd.
San Ramon, CA 94583
(Sent via electronic mail to: markhorne@chevron.com)

Loi & Josephine Le
Loi V Le et al.
4265 Foothill Blvd.
Oakland, CA 94601

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

Dear Mr. Horne 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 *First Quarter 2016 Groundwater Monitoring and Sampling Report*, dated May 6, 2016, and the *Site Investigation Report and Updated Focused Site Conceptual Model*, dated June 3, 2016. These documents were prepared and submitted on your behalf by GHD Services, Inc (GHD). Thank you for submitting the documents, they have moved the site forward, and allow a narrower focusing of future investigations.

ACDEH has re-evaluated site data and recommendations presented in the above-mentioned reports, in conjunction with the case files, and the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on ACDEH staff review, we have determined that the site now additionally meets the LTCP General Criteria e (Site Conceptual Model), and f (Secondary Source Removal). The site does not meet the LTCP Media-Specific Criteria for Groundwater, the Media-Specific Criteria for Vapor Intrusion to Indoor Air, and the Media-Specific Criteria for Direct Contact and Outdoor Air (See Geotracker for the updated LTCP checklist).

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.

TECHNICAL COMMENTS

- 1. LTCP Media Specific Criteria for Groundwater** – To satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites listed in the policy.

Our review of the case files indicates that insufficient data and analysis has been presented to support the requisite characteristics of plume stability, plume length, stable benzene concentrations, or that the property owner may be willing to accept a land use restriction. This analysis considered the following site specific data:

- a. Length of Groundwater Plume** – The length of the shallow groundwater plume has not been defined by the existing offsite downgradient monitoring well network that monitor one of two groundwater bearing zones in the site vicinity. Contaminant concentrations in downgradient groundwater well C-11, the furthest downgradient well monitoring the shallow groundwater zone, remain above water quality objectives. The shallow water-bearing zone has also not been defined laterally to the north or south of well C-11. This appears to be an important step due to multiple basements in the vicinity.