Nowell, Keith, Env. Health

From: Nowell, Keith, Env. Health

Sent: Thursday, October 23, 2014 10:39 AM

To: 'Nicole.Arceneaux@chevron.com'; Marvin Katz (marvin.katz@shell.com)

Cc: Katherine Brandt (Katherine.Brandt@arcadis-us.com); Peter Schaefer

(Pschaefer@CRAworld.com); Roe, Dilan, Env. Health

Subject: Fuel leak cases RO450 and RO2745 -Webster St., Alameda

Dear Ms. Arceneaux and Mr. Katz,

Alameda County Environmental Health (ACEH) staff has reviewed the draft findings for the delineation of the comingled Shell - Unocal off-site methyl tertiary butyl ether (MTBE) plume. The draft findings document the first of phase of work presented in the ACEH approved work plan entitled *Implementation Plan for CPT investigation* (Work Plan), dated March 31, 2014, prepared by ARCADIS U.S., Inc. (ARCADIS). The Work Plan proposes to perform a groundwater investigation of the intermediate and deep groundwater zones for the delineation of the comingled MTBE plume. The Work Plan proposed to perform the groundwater investigation in two phases, with four CPTs proposed for the first phase, and as a contingency second phase, two additional CPT borings would be advanced should the first phase not define the plume.

Based on a review of the data, ACEH is of the opinion the location of CPT-05 as depicted on Figure 3 of the Work Plan, need not be evaluated. This was discussed during a Webex / conference call with Ms. Arceneaux and Ms. Katherine Brandt of ARCADIS on October 22, 2014. Data presented in the Webex showed the distance between CPT-03 and CPT-04 to be approximately 150 feet, not the 175 feet depicted on Figure 3, and the distance between CPT-02 and CPT-06 as 300 feet, not the 285 feet depicted on the map. As the distance between CPT-04 and CPT-06 is approximately 120 feet across Webster St., ACEH is of the opinion that the decreased distance between CPT-03 and CPT-04, on the west side of Webster St. and the increased distance between CPT-06 located on the east side of Webster St. creates a significant gap along the Buena Vista Avenue than the more uniformly-spaced transect envisioned by ACEH.

Additionally, in an email dated October 17, 2014, Ms. Brandt proposed a relocation of CPT-6 to the west toward Webster St. in order to avoid closing a traffic lane on Buena Vista Avenue. ACEH concurs with the relocation of CPT-6.

However, in order to produce a more uniform transect spacing, the gap along the Buena Vista Avenue transect still needs to be addressed. Therefore, ACEH requests the re-location of CPT-05 from its originally proposed location to a midpoint location between CPT-02 and CPT-06 along Buena Vista Avenue. ACEH is aware that utilities may present issues for the exact position of CPT-05 and is agreeable to advancing CPT-05 on either side of Buena Vista Avenue.

ACEH understands the advancement of the CPTs for second phase of work is scheduled for October 31, 2014. As such, ACEH has extended the submittal of the groundwater investigation report to December 29, 2014. Please inform ACEH if additional time is needed for report submittal.

Technical Report Request

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

December 29, 2014

— Groundwater Investigation Report (file name: RO0000450_SWI_R_yyyy-mm-dd)

Thank you for your cooperation. ACEH looks forward to working with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Respectfully, Keith Nowell Keith Nowell PG, CHG Hazardous Materials Specialist Alameda County Environmental Health 1131 Harbor Bay Parkway Alameda, CA 94502-6540

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PDF copies of case files can be reviewed/downloaded at:

http://www.acgov.org/aceh/lop/ust.htm