

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
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December 13, 2017

Mr. Matthew Cohen
1001 I Street
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(Sent via electronic mail to:
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Ms. Shahla Dargahi Farahnak
1001 I Street
Sacramento, CA 95814
(Sent via electronic mail to:
Shahla.Farahnak@waterboards.ca.gov)

Subject: Response to Petition No. DWQP-0252, Fuel Leak Case RO0000454 (Global ID # T0600102230), Chevron #20-6145 / Signal SS, 800 Center Street, Oakland CA 94607

Mr. Cohen and Ms. Farahnak:

The intent of this letter is to provide a response by Alameda County Department of Environmental Health (ACDEH) staff within 20 calendar days (December 17, 2017) to Petition No. DWQP-0252 as required in the State Water Resources Control Board (SWB) letter dated November 27, 2017, and entitled *Petition For Review of Underground Storage Tank Case, Chevron #20-6145/Signal SS, 800 Center Street, Oakland, Alameda County*. In addition to the listed case numbers above, the subject site is also known as SWB UST Cleanup Fund Claim 12265 and San Francisco Bay Regional Water Quality Control Board Case No. 01-2421.

ACDEH Response and Actions Taken

ACDEH has previously provided a technical response to the Request for Closure (RFC) submitted by Chevron Environmental Management Company (CEMC) and their consultant GHD that was entitled *Updated Sensitive Receptor Survey and Site Conceptual Model and Low-Threat Closure Request*, dated March 24, 2017, in a directive letter dated May 23, 2017. Please refer to that letter for the technical reasons ACDEH has determined the site does not meet the SWB *Low Threat Underground Storage Tank Case Closure Policy* (LTCP) of August 2012. Briefly, ACDEH determined that the site did not meet the Groundwater Media-Specific Criteria, and the Direct Contact and Outdoor Air Media-Specific Criteria of the LTCP for the reasons detailed in the referenced letter.

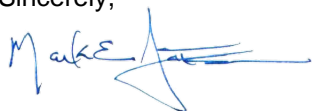
On November 30, 2017, ACDEH held a meeting with CEMC in order to help identify a path towards closure for the site. The main concerns discussed in the meeting included the following:

- Discussion of the pending separation of non-petroleum contamination from petroleum contamination by creation of a separate Site Cleanup Program case to manage the clean-up of non-petroleum contamination in shallow soil at the vacant lot.
- A renewed attempt by CEMC and their consultant to identify potential sensitive receptors downgradient of well MW-6, within the potential groundwater plume area, as discussed in more detail in ACDEH's RFC response letter of May 23, 2017, and the locating of, inspection of, and potential sampling of, a back yard water supply well at the immediately adjacent parcel to the north or northeast,
- The updating of the Conceptual Site Model (CSM) to understand the reason for relatively low groundwater concentrations in shallow site wells in contrast to elevated concentrations in submerged soil (up to 92 milligrams per kilogram [mg/kg] benzene and 480 mg/kg ethylbenzene), and a determination of the potential impacts to basements, sumps, and wells in the vicinity of the site, and
- The identification by CEMC of their preferred Path-to-Closure approach due to the failure of the site in meeting the Direct Contact and Outdoor Air Media-Specific Criteria. Two options were

discussed and included either the use of a Site Management Plan and engineered controls (i.e. pavement, etc.) to manage future risk from exposure to residual contamination at the unpaved site, or the collection of additional samples to determine current day residual contaminant concentrations in the 5 to 10 foot depth interval that based on existing data does not meet this criteria.

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 E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

cc: Ms. Carryl MacLeod, Chevron Environmental Management Co, 6001 Bollinger Canyon Road, San Ramon, CA 94583, (Sent via electronic mail to: CMacleod@chevron.com)

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