



ENVIRONMENTAL HEALTH DEPARTMENT  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
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August 17, 2011

Mr. Ian Robb  
6001 Bollinger Canyon Road  
PO Box 6012  
San Ramon, CA 94583-2324  
(sent via electronic mail to:  
[irobb@chevron.com](mailto:irobb@chevron.com))

Mr. Rene Boisvert  
Boulevard Equity Group  
484 Lake Park Ave #246  
Oakland, CA 94610-2730  
(sent via electronic mail to:  
[rene@boulevardequity.com](mailto:rene@boulevardequity.com))

Terrilla Sadler  
618 Brooklyn Avenue  
Oakland, CA 94606-1004

Subject: Approval of Low Flow Air Sparge Recommendations and Request for Revised Draft CAP  
– Fuel Leak Case No. RO0000454 (Global ID # T0600102230), Chevron #20-6145/Signal SS, 800 Center Street, Oakland CA 94607

Dear Mr. Robb, Mr. Boisvert, and Ms. Sadler:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *First Semi-Annual 2011 Groundwater Monitoring and Sampling Report*, dated April 14, 2011 and the *Low Flow Air Sparge Pilot Test*, dated July 6, 2011; both reports were submitted on your behalf by both prepared by Conestoga-Rovers & Associates (CRA). Thank you for submitting the reports.

The *Low Flow Air Sparge Pilot Test* documents the results of a three month pilot test of the referenced system. In general dissolved hydrocarbon concentrations in more downgradient wells MW-3 and MW-4 noticeably decreased, while concentrations in wells MW-1A and MW-2 noticeably increased within one month after termination of the pilot test. In addition vapor concentrations in all sampled wells (VP-5 could not be sampled due to the presence of water in the probe) substantially increased multiple orders of magnitude. The report found that LFAS was successful in reducing dissolved hydrocarbons in groundwater and recommended continuation of air sparging, combined with vapor extraction to manage the generation of hydrocarbon vapors in the vadose zone. The report recommended that a Remedial Action Plan be generated.

ACEH is in general agreement with the recommendations contained in the *Low Flow Air Sparge Pilot Test* provided the following technical comments are incorporated into a revised draft Corrective Action Plan (CAP). Consequently, we request that you address the following technical comments and send us the documents requested below.

### **TECHNICAL COMMENTS**

- 1. Revised Draft CAP Generation** – In addition to addressing contaminants referenced above, please also incorporate mitigative measures in the revised draft CAP to address the results of the *Surficial Soil Lead Results*, (dated February 15, 2010 and prepared by CRA). This report documented lead concentrations up to 5,760 mg/kg in shallow soils at the site, as well as organochlorine pesticide concentrations above RWQCB ESLs for residential direct exposure. Please submit the revised draft CAP by the date identified below.
- 2. List of Interested Parties** – In preparation for the public comment period to follow generation and acceptance of the draft CAP, ACEH requests the generation of a List of Interested Parties that the *Public Participation Notification* will be issued to. This should include known interested parties as well as vicinity residents and owners. Please submit the List by the date identified below.

- 3. Preferential Pathway, Utility Survey** – During the recent review ACEH did not find a preferential pathway survey for vicinity utilities. If this is an oversight, please inform ACEH as to the location of the survey; however, presuming this was not an oversight, please conduct a utility survey. This appears to be appropriate due to the depth to groundwater, typical utility installation depths, and an apparently short downgradient extent of the dissolved hydrocarbon plume. Specifically, ACEH requests an evaluation of all utility lines, utility laterals, and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s). Please assimilate, reduce, and synthesize available information and maps, and generate appropriate (vicinity and / or site specific) maps and cross-sections illustrating the location and depth of all utility lines and trenches within and near the site and plume areas(s) as part of your study. Please use this information to inform corrective actions addressed in the draft CAP. Please submit a utility preferential pathway survey by the date identified below.

### **TECHNICAL REPORT REQUEST**

Please submit technical reports to ACEH, according to the following schedule:

- **October 28, 2011** – Utility Preferential Pathway Survey
- **November 18, 2011** – Revised Draft CAP & List of Interested Parties

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](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, Conestoga-Rovers & Associates, 5900 Hollis Street, Suite A, Emeryville, CA 94608; (sent via electronic mail to [khoey@croworld.com](mailto:khoey@croworld.com))

N. Scott MacLeod, Conestoga-Rovers & Associates, 5900 Hollis Street, Suite A, Emeryville, CA 94608; (sent via electronic mail to [smacleod@croworld.com](mailto:smacleod@croworld.com))

Leroy Griffin, Oakland Fire Department 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (sent via electronic mail to [lgriffin@oaklandnet.com](mailto:lgriffin@oaklandnet.com))

Donna Drogos, ACEH, (sent via electronic mail to [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org))  
Mark Detterman, ACEH, (sent via electronic mail to [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))  
Geotracker, Electronic Case 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/](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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> July 20, 2010
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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](mailto: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](mailto: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.