

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

COLLEEN CHAWLA, Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY
ALAMEDA, CA 94502
(510) 567-6700
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August 1, 2018

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

Mr. Rene Boisvert
800 Center LLC
c/o Boulevard Equity Group
484 Lake Park Ave #246
Oakland, CA 94610-2730

Mr. Terrell Sadler
618 Brooklyn Avenue
Oakland, CA 94606

Subject: Meeting Identified Submittal, Fuel Leak Case RO0000454 (Global ID # T0600102230),
Chevron #20-6145 / Signal SS, 800 Center Street, Oakland CA 94607

Ms. Carryl MacLeod:

Thank you for participating in the conference call on July 25, 2018 with Alameda County Department of Environmental Health (ACDEH) staff to discuss the site. The conference call was part of an ongoing series of meetings held to determine a path to closure for the petroleum hydrocarbon contamination at the site, and to further discuss the now separated non-petroleum hydrocarbon contamination case that has been separated in to a Site Cleanup Program (SCP) case, under a Voluntary Remedial Action Program (VRAP) agreement. A path forward appears to have been identified in the call.

Based on the discussion in the meeting ACDEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

1. **Work Plan** – As mutually identified in the conference call as a path forward, ACDEH requests the submittal of a work plan to investigate present day soil concentrations in the areas of soil bores CB-1 to CB-7, installed in May 2014. Concentrations up to 92 milligrams per kilogram (mg/kg) benzene and 480 mg/kg ethylbenzene were detected in the 5 to 10 foot depth interval, and at multiple locations did not meet the Low Threat Closure Policy (LTCP) Direct Contact and Outdoor Air Exposure Media Specific Criteria for the commercial or utility worker classification.

As also identified as a path forward in the conference call, this request is to enable an evaluation of submerged versus vadose zone soil concentrations, and an evaluation of treatment options for soil and groundwater at these locations, if required, in the resulting investigation report.

2. **Focused Site Conceptual Model** - The additional intent of the requested work is to also enable a limited update to the Site Conceptual Model (SCM) to account for data from the site that appears to conflict with the current SCM as discussed in previous meetings. These include the following items:

a. **Groundwater Concentrations** – Existing site data indicates significant contamination in soil is present at the site in the 5 to 10 foot depth interval as noted above, while existing groundwater monitoring wells do not document substantially elevated groundwater concentrations. Groundwater concentrations were recently documented on March 3, 2018 to be up to 2,600 micrograms per liter (μ l) Total Petroleum Hydrocarbons as gasoline (TPHg), 530 mg/kg TPH as diesel (TPHd), 9.4 μ l benzene, and 2.5 μ l ethylbenzene in onsite well MW-3.

b. **Air Sparging Volatilization** – The current SCM does not appear to account for rapid volatilization of residual soil contamination during the low-flow air sparging test in comparison to limited contaminant diffusion into groundwater under static conditions as noted above.

- c. Identification of Potential Sensitive Receptors** – As discussed in previous meetings well MW-6 exhibits characteristics that appear to be dissimilar to other site wells. Contrary to most wells at the site, concentrations in well MW-6 increase with higher groundwater levels. A renewed attempt to identify potential sensitive receptors, such as dewatering for basements, if any, downgradient of well MW-6 appears likely to address this issue. An additional potential sensitive receptor also not evaluated is the private residential backyard well at an adjoining property to the northeast of the site. Determining the construction details (depth, screen interval, etc.) for the well is expected to assist in determining exposure, and possible paths of action.

TECHNICAL REPORT REQUEST

Please submit the following technical reports and deliverables to the State Water Board's Geotracker website and notify your case worker by electronic mail (mark.detterman@acgov.org), in accordance with the following specified file naming convention and schedule, as provided below, and in the Responsible Party(ies) Legal Requirements/Obligations which is included as Attachment 1. Please note ACDEH no longer accepts reports on the ftp site.

- **October 19, 2018** – Data Gap Work Plan
(File name: RO0000454_WP_R_yyyy-mm-dd)
- **Sixty Days After Work Plan Approval** – Site Investigation and Focused Site Conceptual Model
(File name: RO0000454_SWI_SCM_R_yyyy-mm-dd)

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 4799, CEG 1788
Senior Geologist
Senior Hazardous Materials Specialist

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

cc: Katherine Szymanowski, ARCADIS, Inc, 2300 Clayton Road, Suite 400, Concord, CA 94520;
(Sent via electronic mail to: Katherine.Szymanowski@arcadis.com)

Dayna Cordano, State Water Resource Control Board; (Sent via electronic mail to:
Dayna.Cordano@Waterboards.ca.gov)

Dilan Roe, ACDEH, (Sent via electronic mail to: dilan.roe@acgov.org)
Paresh Khatri, ACDEH; (Sent via electronic mail to: paresh.khatri@acgov.org)
Mark Detterman, ACDEH, (Sent via electronic mail to: mark.detterman@acgov.org)
Electronic File; GeoTracker

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: 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, Division 3, 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/)

- 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 values¹ 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
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	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	✓	✓	✓	✓	✓

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

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: 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/

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.