



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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October 16, 2008

Terry Grayson
ConocoPhillips
76 Broadway
Sacramento, CA 95818

Subject: Fuel Leak Case No. RO0000459 and GeoTracker Global ID T0600101443, UNOCAL #6419, 6401 Dublin Boulevard, Dublin, CA 94568

Dear Mr. Grayson:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the "Quarterly Status Report – Third Quarter 2007," dated October 31, 2007 and the recently submitted document entitled, "Semi-annual Monitoring Report," dated September 19, 2008, which were both prepared by TRC for the subject site. In September 1993, the USTs were replaced at the site. Visible sheen was observed on the groundwater surface in the excavation pit. Subsequently, several thousand gallons of groundwater was pumped from the excavation pit. A "grab" groundwater sample detected total petroleum hydrocarbons (TPH) as gasoline (g) and benzene at concentrations of 740 µg/L and 14 µg/L, respectively. In February 1994, three groundwater monitoring wells (MW1 through MW3) were installed at the site. A groundwater sample collected from monitoring well MW1 detected TPH-g and benzene at concentrations of 1,800 µg/L and 17 µg/L, respectively. MTBE was not part of the analytical suite until February 1996 when MTBE was detected at a concentration of 1,300 µg/L in a groundwater sample collected from monitoring well MW1. In February 1998, MTBE was detected at a concentration of 32,000 µg/L in a groundwater sample collected from monitoring well MW1. In December 1999, weekly groundwater extraction from the tank backfill well TPW-1 began at the site and continued through August 2000. In the October 31, 2007 Quarterly Status Report, TRC recommends installation of replacement wells that were abandoned due to the road widening project.

ACEH requests that you address the following technical comments and send us the technical work plan and reports requested below.

TECHNICAL COMMENTS

1. **Soil and Groundwater Characterization** – According to the analytical data, significantly elevated concentrations of MtBE were detected at the site. Interim remedial action consisting of weekly groundwater extraction appears to have reduced the concentrations of MtBE onsite. However, the vertical and lateral extent of the MTBE contaminant plume in groundwater does not appear defined. Specifically, MTBE was detected at a concentration of 160 µg/L in a groundwater sample collected on January 9, 2006 from monitoring well MW6 prior to the well abandonment on January 12, 2006. Therefore, the groundwater contaminant plume appears undefined at this time. Please propose a scope of work to address the above-mentioned concerns and submit a work plan due by the date specified below.

2. **Monitoring Well Evaluation** – Total depth of groundwater monitoring well MW1 was reported at 9.28 feet below top of casing in the September 19, 2008, "Semi-annual Monitoring Report." However, according to the monitoring well construction details presented in the "Preliminary Groundwater Investigation Report," dated April 7, 1994, the total depth of monitoring well MW1 was reported to be 19 feet. Please evaluate groundwater monitoring well MW1 to ensure that its integrity has not been compromised. Please report your findings in the soil and groundwater investigation work plan due by the date specified below.

3. **Feasibility Study/Corrective Action Plan** – Beginning December 23, 1999, 26 weekly groundwater extraction events were conducted to reduce the MTBE mass in groundwater at the site. Although interim remedial action appears to have reduced MTBE concentrations onsite, the concentrations are still elevated. Considering that the site is located in an active groundwater basin, preparing a feasibility study/corrective action plan (FS/CAP) appears necessary. Once the contaminant source areas and contaminant plume are adequately characterized, an FS/CAP prepared in accordance with Title 23, California Code of Regulations, Section 2725 appears appropriate. The FS/CAP must include a concise background of soil and groundwater investigations performed in connection with this case and an assessment of the residual impacts of the chemicals of concern (COCs) for the site and the surrounding area where the unauthorized release has migrated or may migrate. The FS/CAP should also include, but not limited to, a detailed description of site lithology, including soil permeability, and most importantly, contamination cleanup levels and cleanup goals, in accordance with the San Francisco Regional Water Quality Control Board Basin Plan and appropriate ESL guidance for all COCs and for the appropriate groundwater designation. Please note that soil cleanup levels should ultimately (within a reasonable timeframe) achieve water quality objectives (cleanup goals) for groundwater in accordance with San Francisco Regional Water Quality Control Board Basin Plan. Please propose appropriate cleanup levels and cleanup goals in accordance with 23 CCR Section 2725, 2726, and 2727 in the FS/CAP.

The FS/CAP must evaluate at least three viable alternatives for remedying or mitigating the actual or potential adverse effects of the unauthorized release(s) in addition to the "no action" and "monitored natural attenuation" remedial alternatives. Each alternative shall be evaluated for cost-effectiveness and the Responsible Party must propose the most cost-effective corrective action.

4. **Alameda County FTP Server & GeoTracker Compliance** – A review of the electronic case file indicates that the site is currently not in compliance. In order to fulfill your reporting requirements, the electronic copy (PDF) must be uploaded to ACEH's FTP server in addition to the electronic uploads to the SWRCB's GeoTracker website. To regain compliance status, please upload all missing reports to ACEH's FTP website within thirty days from the date of this letter. Electronic reporting is detailed below.

REQUEST FOR INFORMATION

ACEH's case file for the subject site contains the following electronic reports as listed on our website (<http://www.acgov.org/aceh/lop/ust.htm>). You are requested to submit copies of all other reports related to environmental investigations for this property (including previously submitted reports to GeoTracker) by **November 14, 2008**.

NOTIFICATION OF FIELDWORK ACTIVITIES

Please schedule and complete the fieldwork activities by the date specified below and provide ACEH with at least three (3) business days notification prior to conducting the fieldwork, including quarterly groundwater sampling.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Paresh Khatri), according to the following schedule:

- **December 15, 2008** – Soil and Water Investigation Work Plan
- **January 30, 2009** – Quarterly Monitoring Report (4th Quarter 2008)
- **April 30, 2009** – Quarterly Monitoring Report (1st Quarter 2009)
- **July 30, 2009** – Quarterly Monitoring Report (2nd Quarter 2009)
- **October 30, 2009** – Quarterly Monitoring Report (3rd Quarter 2009)

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.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml).

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

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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

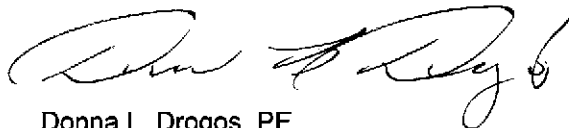
If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 777-2478 or send me an electronic mail message at paresh.khatri@acgov.org.

Sincerely,



Paresh C. Khatri
Hazardous Materials Specialist



Donna L. Drogos, PE
Supervising Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: John Reay, Delta, 11050 White Rock Road, Suite 110, Rancho Cordova, CA 95670
Cheryl Dizon (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551
Donna Drogos, ACEH
Paresh Khatri, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, 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

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- 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)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

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 dehloptoxic@acgov.org
or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
 - 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 and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - 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 dehloptoxic@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 at 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)