Nowell, Keith, Env. Health

To: TimBishop@chevron.com

Cc: Katherine.Brandt@arcadis-us.com; AFischer@Chevron.com; Roe, Dilan, Env. Health

Subject: Fuel Leak Case RO499 Unocal #5367, 500 Bancroft Ave., San Leandro

Dear Mr. Bishop,

Thank you, Katherine Brandt of ARCADIS U.S. Inc. (ARCADIS), and Alexis Fischer of Chevron Environmental Management Company (Chevron) for participating in the meeting on January 21, 2014 regarding fuel leak case for Unocal #5367, 500 Bancroft Ave, San Leandro, Alameda County Environmental Health (ACEH) case number RO0000499. The purpose of the meeting was to discuss the status of the case and identify action items to move the case forward toward closure. ACEH acknowledged the case may be closeable under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) but expressed concerns regarding recent groundwater data trends, nearby beneficial use wells, and contaminant plume length. Therefore at this juncture, please address the following technical comments and submit the requested documents by the dates specified below:

Technical Comments

- <u>Data Trends</u> The most recent groundwater monitoring event, conducted on March 1, 2013, reported concentration increases for total petroleum hydrocarbons as gasoline (TPHg) for several wells and detectable TPHg concentrations in wells that have been historically non-detect. Please conduct an additional round of groundwater monitoring to access the data trends recently observed for the site.
- Beneficial Use Wells Three nearby down gradient domestic wells, one located along Dowling Boulevard and two along Victoria Court, were identified in the August 22, 2008 sensitive receptor survey performed for the subject site. Occupants of the three parcels did not respond to inquiries made regarding the status of the wells. The Dowling Boulevard well is situated less than 280 feet from groundwater monitoring well MW-6, which was most recently (March 1, 2013) reported to contain 210 micrograms per liter (µg/L) TPHg.
- Contaminant Plume Length The LTCP Media-Specific Criteria for Groundwater includes criteria for plume length that exceeds Water Quality Objectives (WQOs) and for the distance from leading edge of the plume to the nearest supply well. ACEH noted MW-6, a down gradient groundwater monitoring well, was most recently (March 1, 2013) reported to contain 210 micrograms per liter (μg/L) total petroleum hydrocarbons as gasoline (TPHg); therefore, the plume has not been defined to the west-northwest of the site.
- SVE Equipment Removal Aging soil vapor and groundwater extraction systems remediation equipment has sat idle in the property since March 1997. ACEH agreed with the request for the removal of the remediation equipment.

As discussed in the meeting please prepare a focused site conceptual model to address the technical comments above to address plume length using the LTCP Technical Justification paper and a rose diagram incorporated onto the plume maps to aid in assessing the shape of the contaminant plume.

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:

- April 15, 2014 Focused Site Conceptual Model (file name: RO0000499 SCM R yyyy-mm-dd)
- April 15, 2014 Groundwater Monitoring Report (file name: RO0000499_GWM_R_yyyy-mm-dd)

Thank you for your cooperation. ACEH looks forward to working with you and your consultant 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 phone: 510 / 567 - 6764

fax: 510 / 337 - 9335

email: keith.nowell@acgov.org

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

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