CONESTOGA-ROVERS & ASSOCIATES

2300 Clayton Road, Suite 920
Concord, California 94520
Telephone: (925) 849-1000 Fax: (925) 849-1040
www.CRAworld.com

TRANSMITTAL

DATE: 10/3/14

REFERENCE NO.: 311959

PROJECT NAME: Former Chevron Station 91026

TO: Mr. Mark Detterman
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

RECEIVED
By Alameda County Environmental Health at 8:48 am, Oct 07, 2014

Please find enclosed:
- ☐ Draft
- ☐ Originals
- ☐ Prints
- ☒ Final
- ☐ Other

Sent via:
- ☐ Mail
- ☐ Overnight Courier
- ☐ Same Day Courier
- ☒ Other Alameda County FTP Site

QUANTITY	DESCRIPTION
1	Conceptual Site Model Addendum and Closure Request

- ☐ As Requested
- ☐ For Your Use
- ☒ For Review and Comment
- ☐
- ☐

COMMENTS:
Should you have any questions or require additional information, please contact Nathan Lee at (925) 849-1003.

Copy to: Ms. Alexis Fischer
Mr. Gary Bankhead, Kaiser Hospital
Heitzinger Associates

Completed by: Nathan Lee [Please Print]

Signed: Nathan Lee

Filing: **Correspondence File**

Alexis Fischer
Project Manager
Marketing Business Unit

Chevron Environmental Management Company
6101 Bollinger Canyon Road
San Ramon, CA 94583
Tel (925) 790-6441
afischer@chevron.com

Alameda County Health Care Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Re: Former Chevron Service Station No. 91026
3701 Broadway
Oakland, CA

I have reviewed the attached report entitled *Conceptual Site Model Addendum and Low-Threat Case Closure Request*.

I agree with the conclusions and recommendations presented in the referenced report. The information in this report is accurate to the best of my knowledge and all local Agency/Regional Board guidelines have been followed. This report was prepared by Conestoga-Rovers & Associates, upon whose assistance and advice I have relied.

This letter is submitted pursuant to the requirements of California Water Code Section 13267(b)(1) and the regulating implementation entitled Appendix A pertaining thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Sincerely,

Alexis Fischer
Project Manager

Attachment: *Revised Conceptual Site Model Addendum and Low-Threat Case Closure Request*

CONCEPTUAL SITE MODEL ADDENDUM AND CLOSURE REQUEST

FORMER CHEVRON STATION 91026
3701 BROADWAY
OAKLAND, CALIFORNIA
AGENCY CASE NO. RO0000500

Prepared For:

Mr. Mark Detterman
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6557

Prepared by:
Conestoga-Rovers & Associates

5900 Hollis Street, Suite A
Emeryville, California
U.S.A. 94608

Office: (510) 420-0700
Fax: (510) 420-9170

web:
http:\\www.CRAworld.com

OCTOBER 3, 2014
REF. NO. 311959 (11)
This report is printed on recycled paper

CONCEPTUAL SITE MODEL ADDENDUM AND CLOSURE REQUEST

FORMER CHEVRON STATION 91026
3701 BROADWAY
OAKLAND, CALIFORNIA
AGENCY CASE NO. RO0000500

N. Scott MacLeod, PG 5747

Prepared by:
Conestoga-Rovers & Associates

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OCTOBER 3, 2014
REF. NO. 311959 (11)
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1.0 INTRODUCTION

Conestoga-Rovers & Associates (CRA) is submitting this *Conceptual Site Model Addendum and Closure Request* on behalf of Chevron Environmental Management Company (Chevron) for Former Chevron Station No. 91026 located at 3701 Broadway, Oakland, California (Figure 1). The site meets general and media-specific criteria and should be closed under the *Low-Threat Underground Storage Tank Case Closure* Policy (LTCP) without additional assessment or remediation. A revised conceptual site model (CSM) was requested by Alameda County Environmental Health (ACEH) in a letter dated April 29, 2014 (Appendix A). The Conceptual Site Model and Low-Threat Case Closure Request has been revised and resubmitted. Specific technical comments raised in the April 29, 2014 letter are addressed below.

2.0 RESPONSE TO TECHNICAL COMMENTS

2.1 LTCP GENERAL CRITERIA (SITE CONCEPTUAL MODEL)

This *Conceptual Site Model Addendum and Closure Request* provides additional analysis on the nature, extent, and mobility of the release to support compliance with Media Specific Criteria for Groundwater and Vapor Intrusion to Indoor Air. These analyses are included below.

2.2 LTCP MEDIA SPECIFIC CRITERIA FOR GROUNDWATER

2.2.1 LENGTH OF GROUNDWATER CONTAMINANT PLUME

There are three monitoring wells in the median of MacArthur Boulevard (E, F, and EA-1) downgradient of the former source area, none of which have had any significant hydrocarbon or LNAPL detections for the last 20 years. Based on historic groundwater flow directions, wells E, F and EA-1 are directly downgradient of the center of the hydrocarbon plume. Wells E and F were originally installed in 1982 with screen intervals of 5 to 20 feet below grade (fbg), similar to the former onsite wells. These wells consistently had insufficient groundwater to sample and in 1992 wells E and F were deepened to their current screen intervals of 20 to 35 fbg and 15 to 30 fbg, respectively.

The ACEH indicated that wells E and F have submerged screens. While this is true for well E, well F had the potentiometric surface within the screen (i.e. not submerged) from 1989 to 1992 and from 2010 to 2014. No LNAPL was detected during these timeframes when the well screen was not submerged. In September 8, 1993 (when the well screen was submerged) 0.04 feet of LNAPL was reported in well F; however, no dissolved

hydrocarbons were detected in the sampling events immediately prior to or after this event. Therefore it is unlikely that the material detected was hydrocarbons or we would expect to detect a dissolved gasoline signature.

Well EA-1 is screened across the potentiometric surface and no LNAPL has been detected in this well. This fact combined with the lack of dissolved concentrations at all three well locations is an indication that LNAPL does not extend to these wells. Therefore, CRA asserts that the extent of LNAPL is adequately defined and no additional assessment is warranted or needed to make closure decisions.

2.2.2 RESIDUAL GROUNDWATER BENZENE CONCENTRATION

According to the *Environmental Assessment Report* conducted by Groundwater Technology, Inc., dated January 19, 1993, when monitoring wells E and F were deepened, the extended borings were not logged. However, the report states that the materials encountered during drilling consisted of clays, silty clays, sandy clays, and fine sands; there is no mention of gravel. Therefore, CRA asserts that the wells E, F and EA-1 are appropriately screened to monitor dissolved hydrocarbons originating from the site and that the extent of the dissolved plume is defined sufficiently to make closure decisions.

2.2.3 PREFERENTIAL PATHWAY EVALUATION

ACEH indicated there was no soil analytical data for soil borings SP3, SP8, SP16, SP-17 or SP18B. However, soil analytical data for SP18B is presented in the Cumulative Soil Analytical Data table (no TPHg or BTEX were detected at 12 fbg). No TPHg or BTEX were detected in nearby offsite boring SP18A. Both of these borings are downgradient of the site.

There are several borings closer to the source area onsite that have elevated hydrocarbon concentrations at similar depths. For instance, boring SWS-6 near SP18B had 1.5 mg/kg TPHg at 10 fbg and 620 mg/kg at 15 fbg. Boring SWS-3 near SP18A had 12 mg/kg TPHg at 10 fbg and 91 mg/kg at 15 fbg. The fact that no hydrocarbons are detected at similar depths in SP18A and SP18B indicates the hydrocarbons in soil did not extend to the street at these depths. This depth is also near the potentiometric surface based on water level measurements in nearby wells. The lack of hydrocarbons in soil in SP18A and SP18B near the water table indicates no LNAPL has migrated to these locations. These locations are between the former LNAPL source area and the potential preferential pathways (utilities) in MacArthur Boulevard for which ACEH expressed

concern. Therefore, there is no evidence that LNAPL extended to the utilities.

According to the City of Oakland utility map, the bottom of the sewer line appears to be approximately 20 fbg and the bottom of the storm drain appears to be approximately 10 fbg. Groundwater depth in wells B, B-1, and B-2, located along the southern property boundary, has not always measured greater than 10 fbg; therefore it is unlikely the storm drain, located in MacArthur Boulevard downgradient of the site, is acting as a preferential pathway for dissolved hydrocarbon migration. The City of Oakland has been contacted to request information on the fill material surrounding the storm drain; CRA is awaiting a response.

Regardless of the outcome of the inquiry into the construction of the storm sewer, the fact that no dissolved hydrocarbons are consistently detected in borings E, F and EA-1 indicate there is no significant dissolved plume and no additional assessment is proposed to support a closure decision.

2.2.4 VICINITY WATER SUPPLY WELL SURVEY

CRA has compiled well data provided by California Department of Water Resources (DWR) and by Alameda County Public Works Agency (ACPWA). Based on well data from the two agencies, there are no wells located within 1,000 feet of the site. There is one irrigation well located approximately 1,900 feet upgradient. The water supply well and sensitive receptors are listed in Table 1 and located on Figure 3 and one pre-school that is located just outside of the 1,000 feet radius.

2.3 LTCP MEDIA SPECIFIC CRITERIA FOR VAPOR INTRUSION TO INDOOR AIR

According to Kaiser Permanente's McCarthy Construction Project Manager, dewatering is not ongoing at the site. As requested, documentation of the material used to backfill the southern portion of the site is included in Appendix B. The backfill material was characterized as "100 percent virgin quarried basalt".

In a letter to Kaiser Permanente dated May 1, 2006, ACEH provided technical comments for Fuel Leak Cases RO500 and RO205. Within the first technical comment, ACEH asked if a moisture vapor barrier would be used since it was proposed that the subsurface building would be at a depth of 15 fbg surface. In a letter to ACEH on behalf of Kaiser Permanente, dated May 26, 2006, Secor addressed this comment stating that, "It is Kaiser Permanente's understanding that a moisture barrier will be used, and that the structure's surface treatment has been designed to withstand chemical constituents

in soil and groundwater". ACEH responded in a letter dated June 13, 2006, stating that, "***It appears that the County concerns have been adequately addressed***…A set of the requested design drawings for the development will be provided from Kaiser as soon as available. Kaiser states that a moisture vapor barrier is presumed to be included". All correspondence is located in Appendix A.

Because ACEH previously enquired into this issue and was satisfied with the information provided addressing the potential vapor concern, CRA considers this concern addressed. Because there is no air-filled pore space beneath the building it is infeasible to collect sub-slab soil vapor samples.

2.4 SITE CONCEPTUAL MODEL ADDENDUM AND DATA GAP INVESTIGATION WORK PLAN

The CSM Addendum is presented herein and based on the above information, it has been determined that a Data Gap Investigation Work Plan is not necessary.

2.5 REQUEST FOR CLOSURE DOCUMENT

The *Revised Conceptual Site Model and Low-Threat Case Closure Request* will be submitted under a separate cover, to address errors in the *Conceptual Site Model and Low-Threat Case Closure Request*.

2.6 GROUNDWATER MONITORING

CRA will continue annual groundwater monitoring, as stated in the ACEH letter dated July 24, 2009 (Appendix A).

3.0 CONCLUSIONS AND RECOMMENDATIONS

Based on our review, the site conditions satisfy the case-closure requirements of the Health and Safety Code section 25296.10, and case closure is consistent with Resolution 92-49 that requires that cleanup goals be met within a reasonable time frame.

Because no analytes are detected in groundwater and because these wells are in streets where sampling personnel are at risk of serious injury or death while sampling, CRA

recommends that groundwater monitoring be suspended until ACEH reviews this closure request.

Figures

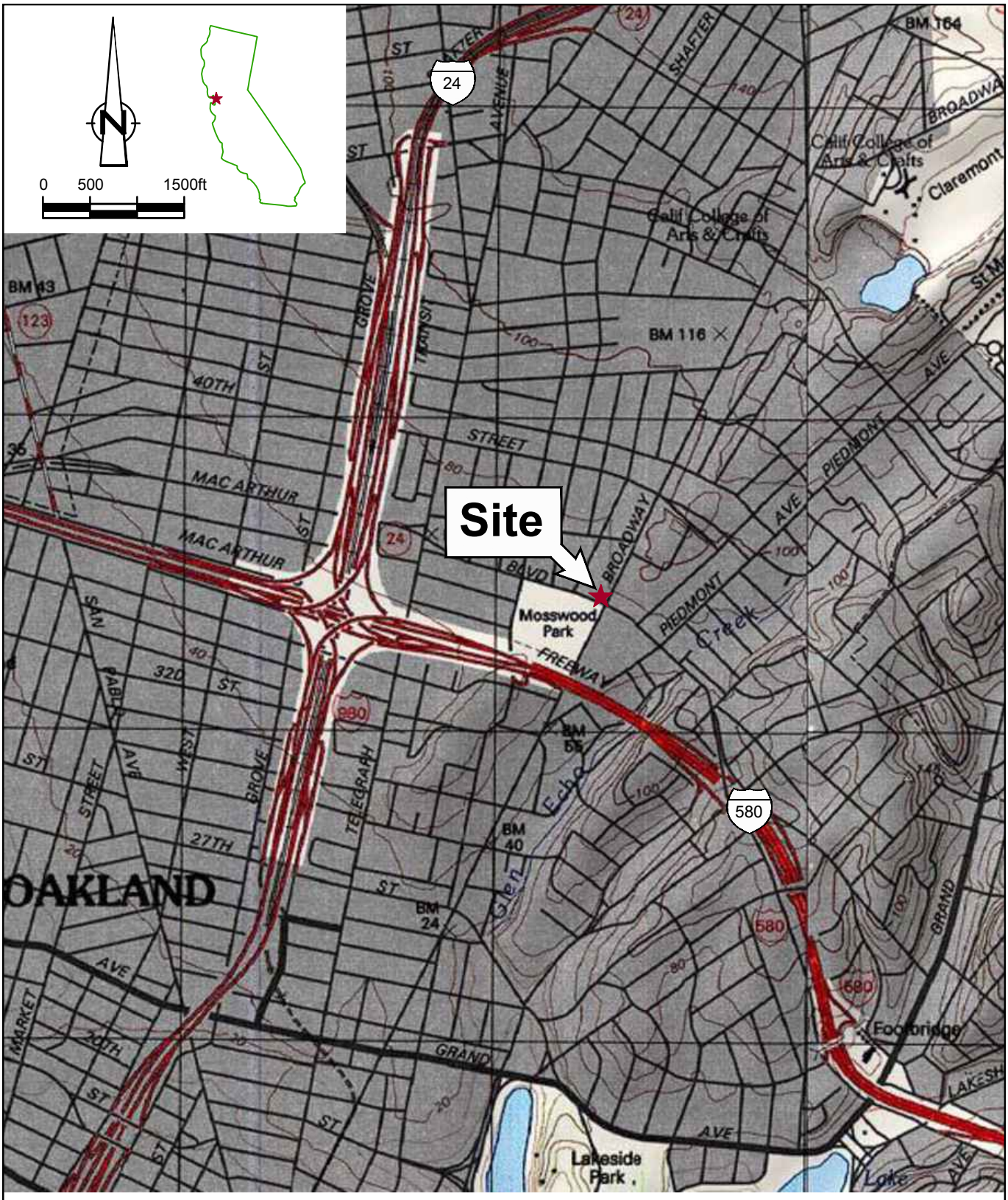

Figure 1

VICINITY MAP
FORMER CHEVRON STATION 9-1026
3701 BROADWAY
Oakland, California

311959-2014.5(011)GN-WA001 SEP 25/2014

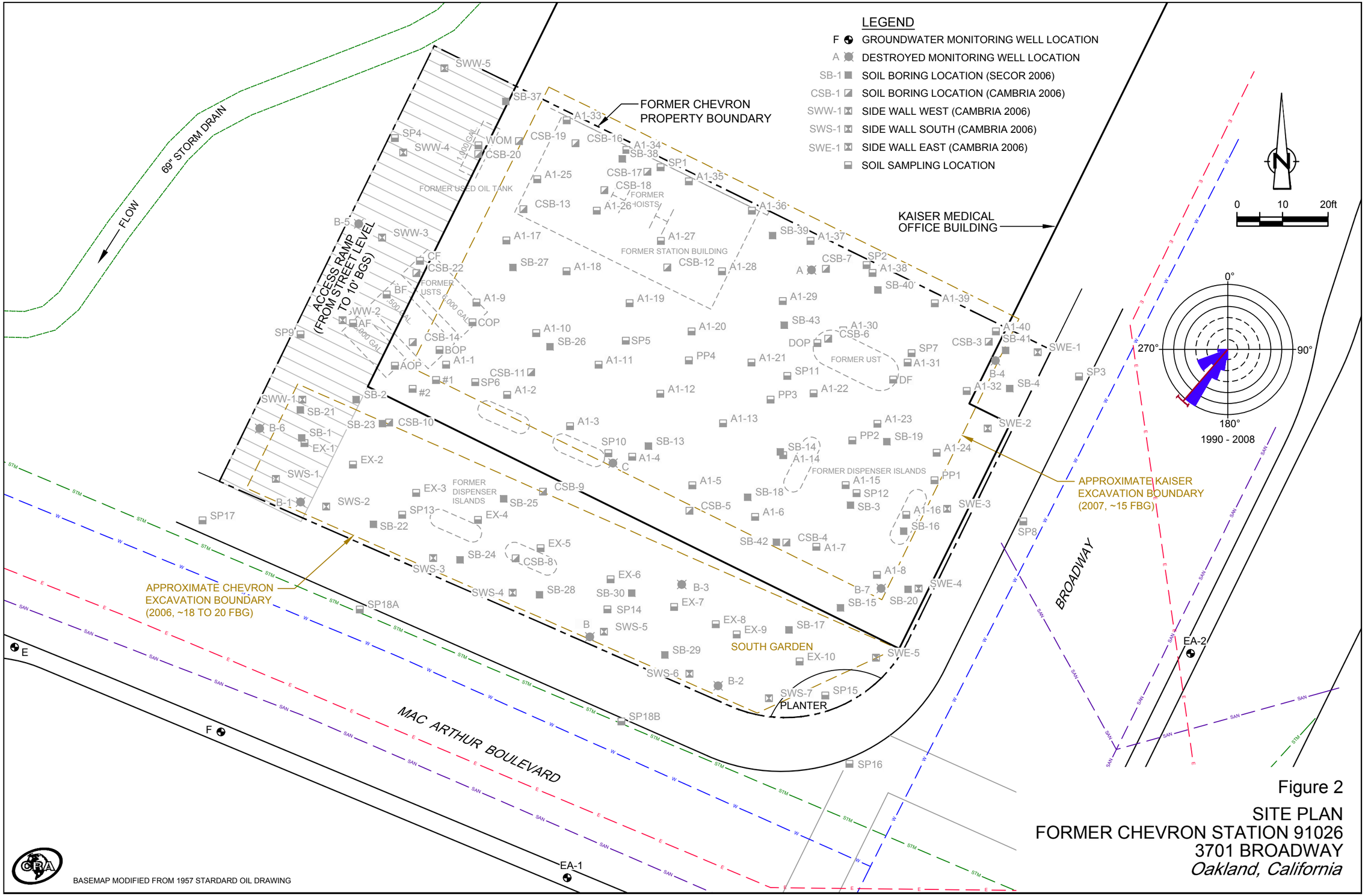

Figure 2

SITE PLAN
FORMER CHEVRON STATION 91026
3701 BROADWAY
Oakland, California

311959-2014.5(011)GN-WA002 SEP 25/2014

Figure 3

POTENTIAL RECEPTORS
FORMER CHEVRON STATION 91026
3701 BROADWAY
Oakland, California

311959-2014.5(011)GN-WA003 OCT 1/2014

Table

TABLE 1
POTENTIAL SENSITIVE RECEPTORS
FORMER CHEVRON STATION 91026
3701 BROADWAY, OAKLAND, CALIFORNIA

ID #	*Potential Sensitive Receptor*	*Address*	*Owner*	*Distance (ft)*	*Direction*
	Water Supply Wells				
1	Irrigation	4082 Piedmont Avenue	John Bond	1,800	Northeast
	Daycares/Pre-Schools				
2	Snow White Pre-School	214 West MacArthur Boulevard		1,100	Southeast
	Hospitals				
4	Kaiser Permanente Medical Center	280 West MacArthur Boulevard		300	East

Appendix A

Regulatory Letters

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
ALEX BRISCOE, Agency Director

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

April 29, 2014

Ms. Alexis Fischer
Chevron Environmental Management
PO Box 6012
6101 Bollinger Canyon Rd
San Ramon, CA 94583

Mr. Gary Bankhead
Kaiser Foundation Hospitals
100 San Leandro Blvd.
San Leandro, CA 94577

Heitzinger Associates
PO Box 1613
Pebble Beach, CA 93953
Pasadena, CA 91188

Subject: Request for Data Gap Work Plan and Focused Site Conceptual Model; Fuel Leak Case No. RO0000500 (Global ID # T0600100334), Chevron #9-1026, 3701 Broadway, Oakland CA 94611

Dear Ms. Fischer, Mr. Bankhead, and Heitzinger Associates:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Conceptual Site Model and Low-Threat Case Closure Request,* dated March 18, 2014. The report was submitted on your behalf by Conestoga-Rovers & Associates (CRA). Thank you for the submittal.

ACEH has evaluated the data and recommendations presented in the above-mentioned reports, in conjunction with the case files, to determine if the site is eligible for closure as a low risk site under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on ACEH staff review, we have determined that the site fails to meet the LTCP General Criteria e (Site Conceptual Model), and the Media-Specific Criteria for Groundwater, and the Media-Specific Criteria for Vapor Intrusion to Indoor Air (see Geotracker for a copy of the LTCP checklist).

Therefore, at this juncture ACEH requests that you prepare a Site Conceptual Model (SCM) Addendum, and a Data Gap Investigation Work Plan that is supported by the SCM Addendum, to address the Technical Comments provided below and discussed with you in a meeting with Chevron and ACEH staff on April 24, 2014.

TECHNICAL COMMENTS

1. **LTCP General Criteria e (Site Conceptual Model)** – According to the LTCP, the SCM is a fundamental element of a comprehensive site investigation. The SCM establishes the source and attributes of the unauthorized release, describes all affected media (including soil, groundwater, and soil vapor as appropriate), describes local geology, hydrogeology and other physical site characteristics that affect contaminant environmental transport and fate, and identifies all confirmed and potential contaminant receptors (including water supply wells, surface water bodies, structures and their inhabitants). The SCM is relied upon by practitioners as a guide for investigative design and data collection. All relevant site characteristics identified by the SCM shall be assessed and supported by data so that the nature, extent and mobility of the release have been established to determine conformance with applicable criteria in this policy.

   Our review of the case files indicates that insufficient data collection and analysis has not been presented to assess the nature, extent, and mobility of the release and to support compliance with Media Specific Criteria for Groundwater, and Vapor Intrusion to Indoor Air, as described in Technical Comments 2 and 3 below, respectively.

2. **LTCP Media Specific Criteria for Groundwater** – To satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or

decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites listed in the policy.

Our review of the case files indicates that insufficient data collection and analysis has been presented to support the requisite characteristics of plume stability or plume classification as follows:

a. **Length of Groundwater Contaminant Plume** – The length of the offsite groundwater and Light Non-Aqueous Phase Liquids (LNAPL) contaminant plumes appears to be poorly constrained. Onsite downgradient property line wells B and B-2 contained LNAPL while they were monitored, and well B contained continuous LNAPL until it was destroyed in July 2006. Offsite downgradient wells have been historically non-detect. Offsite well EA-1, located approximately 60 feet downgradient of well B-2 (as defined by the predominant groundwater flow direction in the rose diagram) has a 25 foot long screen interval, and is screened between 25.5 and 32 feet below grade surface (bgs) across a gravel layer that can cause significant vertical mixing of groundwater and dilute contaminant concentrations in the groundwater column. The groundwater and LNAPL plumes downgradient of LNAPL well B, as determined by the rose diagram, do not appear to have been historically monitored. Additionally, offsite and downgradient wells E and F are considered to be submerged and therefore not capable of delineating LNAPL. Therefore the offsite length of the groundwater and LNAPL plumes do not appear to have been determined.

   As discussed in the April 24, 2014 meeting, the dissolved-phase plume extent can be defined either through additional investigation or by delineating the maximum extent of the plume using the LTCP technical justification papers, and locating sensitive receptors including basements and other dewatering infrastructures within that area. However, upon further review, ACEH notes that maximum dissolved-phase residual benzene concentrations have not been determined and therefore requires data collection onsite (see next).

b. **Residual Groundwater Benzene Concentration** – As discussed in the meeting, soil samples collected at the base of the excavation contained the highest benzene concentrations in the historical soil sample data set. These concentrations appear to remain beneath, or near, the underground medical office building. Although substantial groundwater dewatering was conducted at the time of the construction of the Kaiser-Permanente hospital and medical offices, the effect of the dewatering wells (and principal depth of water intake) on residual soil contamination, has not been assessed at the site since remediation. Wells E and F also are screened between 25 – 35 feet and 15 – 30 feet bgs, respectively, and although concentrations in these wells appear to define the dissolved-phase plume vertically, the bore logs are not logged below 20 feet and thus the screens may intercept the same gravel unit observed in well EA-1. Therefore the magnitude of the onsite and offsite groundwater concentrations and plume extent remain undefined.

c. **Preferential Pathway Evaluation** – Two utility conduits (storm drain and sewer) have been identified in MacArthur Boulevard at depths that can act as preferential pathways for contaminant migration immediate downgradient of the subject site (dissolved-phase and LNAPL in wells B and B-2). It appears that a series of soil bores were installed offsite along the property perimeter, and along MacArthur Boulevard, including along the storm drain conduit located beneath the street. However, except for SP18A soil data, soil and / or groundwater analytical data is not included in the historical data set. Specifically, this includes soil bores SP3, SP8, SP16, SB18B, and SP17. This data may also help delineate the length of the groundwater and LNAPL plumes offsite.

d. **Vicinity Water Supply Well Survey** – The referenced report indicated that the Geotracker Groundwater Ambient Monitoring and Assessment (GAMA) database was reviewed to determine if water supply wells are located within 1,000 feet of the subject site. ACEH views the database as a starting point for well surveys as it does not contain the complete datasets maintained by the Department of Water Resources (DWR) and the Alameda County Public Works Agency (ACPWA). These databases contain additional information about privately owned waters supply wells in the vicinity. Consequently, ACEH requests these resources also be included in a well survey for the site.

Please present a strategy in a Data Gap Work Plan (described in Technical Comment 4 below) to address the Technical Comments discussed above, or alternatively, please provide justification of why the site satisfies the Media-Specific Criteria for Groundwater in an addendum to the SCM described in Technical Comment 4 below.

3. **LTCP Media Specific Criteria for Vapor Intrusion to Indoor Air** – The LTCP describes conditions, including bioattenuation zones, which if met will assure that exposure to petroleum vapors in indoor air will not pose unacceptable health risks to human occupants of existing or future site buildings, and adjacent parcels. Appendices 1 through 4 of the LTCP criteria illustrate four potential exposure scenarios and describe characteristics and criteria associated with each scenario.

   Our review of the case files indicates that the site data collection and analysis fail to support the requisite characteristics of one of the four scenarios. Specifically, while extensive excavation occurred at the subject site, substantial residual soil contamination remained beneath the medical offices (concentrations up to 8,600 milligrams per kilogram [mg/kg] Total Petroleum Hydrocarbons [TPH] as gasoline; 4,300 mg/kg TPH as diesel, 14,000 mg/kg Total Oil and Grease, 31 mg/kg benzene, and 100 mg/kg ethylbenzene). As discussed in the April 24, 2014 meeting, it is anticipated that substantial oxygenation of the residual contamination occurred at the time of excavation; however, the effect of the oxygenation, and the thickness of the residual soil contamination beneath the medical offices at the site has not been evaluated, nor has the site been assessed for the potential of vapor intrusion to the subgrade medical offices. Additionally, while a waterproofing membrane is reported to have been installed beneath the medical offices, DTSC does not regard a water barrier to be a vapor barrier. As discussed in the meeting, please provide documentation confirming dewatering of the site is ongoing. Based on the dissolved-phase concentration of benzene in groundwater samples requested to be collected in the southern portion of the site (see Technical Comment 2) please provide justification of why the site satisfies the Media-Specific Criteria for Vapor Intrusion to Indoor Air in an addendum to the SCM that assures that exposure to petroleum vapors in indoor air will not pose unacceptable health risks to occupants of adjacent buildings.

   Please also provide documentation as to the nature of the backfill material used to backfill the southern portion of the former Chevron site in order to assess the risk for vapor exposure in this area. Alternatively, please present a strategy in a Data Gap Investigation Work Plan described in Technical Comment 4 below to collect additional data to satisfy the bioattenuation zone characteristics of Scenarios 1, 2 or 3, or to collect soil gas data to satisfy Scenario 4.

   Please note, that if direct measurement of soil gas is proposed, ensure that your strategy is consistent with the field sampling protocols described in the Department of Toxic Substances Control's Final Vapor Intrusion Guidance (October 2011). Consistent with the guidance, ACEH requires installation of permanent vapor wells to assess temporal and seasonal variations in soil gas concentrations.

4. **Site Conceptual Model Addendum and Data Gap Investigation Work Plan** – Please prepare a SCM Addendum and a Data Gap Investigation Work Plan, to address the technical comments listed above. Please support the scope of work in the Data Gap Investigation Work Plan with the SCM Addendum and Data Quality Objectives (DQOs) that relate the data collection to each LTCP criteria. For example please clarify which scenario within each Media-Specific Criteria a sampling strategy is intended to apply to.

   The SCM Addendum can be presented in a focused SCM format. In order to do so, please see Attachment A "Site Conceptual Model Requisite Elements". Please sequence activities in the proposed revised data gap investigation scope of work to enable efficient data collection in the fewest mobilizations possible.

5. **Request for Closure Document** – A number of factual errors were noted in the referenced document. In particular the list of maximum residual concentrations in soil in Section 3.2.2 is consistently incorrect and substantially under reports maximum residual concentrations for many of the contaminants listed (one example is the maximum benzene listed is 3.1 mg/kg, on Table 2 [misnamed Table 3], corrected it is 31 mg/kg). It appears appropriate to revise the text of the SCM, in the SCM addendum, to accurately report residual maximum concentrations at the site.

6. **Groundwater Monitoring** – ACEH is in general agreement that groundwater monitoring can be reduced at the site until further case review, and the representativeness of groundwater samples, can be undertaken. Consequently, ACEH requests that groundwater monitoring be reduced to a bi-annual basis from the previous sampling event (March 2013).

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Barbara Jakub), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **July 25, 2014** – Site Conceptual Model Addendum and if appropriate, Data Gap Investigation Plan

  (File to be named: WP_SCM_R_yyyy-mm-dd)

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.

Online case files are available for review at the following website: http://www.acgov.org/aceh/index.htm.

If you have any questions, please call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Digitally signed by Mark E. Detterman
DN: cn=Mark E. Detterman, o, ou, email, c=US
Date: 2014.04.29 12:18:30 -07'00'

Mark E. Detterman, P.G., C.E.G.
Senior Hazardous Materials Specialist

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

Attachment A – Site Conceptual Model Requisite Elements

cc: Kiersten Hoey, Conestoga-Rovers & Associates, Inc., 5900 Hollis Street, Suite A, Emeryville, CA 94608; (sent via electronic mail to khoey@craworld.com)

Nathan Lee, Conestoga-Rovers & Associates, Inc., 5900 Hollis Street, Suite A, Emeryville, CA 94608; (sent via electronic mail to nlee@craworld.com)

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

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

Dilan Roe, ACEH (sent via electronic mail to dilan.roe@acgov.org)
Mark Detterman (sent via electronic mail to mark.detterman@acgov.org)
Electronic file, GeoTracker

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

July 24, 2009

HEITZINGER ASSOC
PO BOX 1613
PEBBLE BEACH CA 93953

AARON COSTA
CHEVRON CORPORATION
6111 BOLLINGER CANYON ROAD
RM 3660
SAN RAMON CA 94583

GARY BANKHEAD
KAISER FOUNDATION
HOSPITALS
100 SAN LEANDRO BLVD
SAN LEANDRO CA 94577

Subject: Fuel Leak Case No. RO0000500 and Geotracker Global ID T0600100334, CHEVRON #9-1026, 3701 BROADWAY, Oakland CA 94611 – Groundwater Monitoring Requirements

Dear Responsible Party:

The purpose of this correspondence is to inform you of changes to groundwater monitoring requirements for all fuel leak cases in California. The California State Water Resources Control Board (State Water Board) has approved Resolution No. 2009-0042 (*Actions to Improve Administration of the UST Cleanup Fund and UST Cleanup Program*). Resolution No. 2009-0042 states that, "*Regional Water Board and LOP agencies shall reduce quarterly groundwater monitoring requirements to semiannual or less frequent monitoring at all site unless site-specific needs warrant otherwise and shall notify all responsible parties of the new requirements no later than August 1, 2009. If more than semiannual monitoring is required for a case, the responsible party and State Water board shall be notified of the rationale and the notice shall be posted on Geotracker.*"

In accordance with Resolution No. 2009-0042, groundwater monitoring for your site is to continue with annual monitoring unless site-specific needs warrant otherwise.

If you have any questions, please call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark E. Detterman, PG, CEG
Hazardous Materials Specialist
Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Charlotte Evans, CRA, 5900 Hollis St, Suite A, Emeryville, CA 94608
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (*Sent via E-mail to:* lgriffin@oaklandnet.com)
Donna Drogos, ACEH (*Sent via E-mail to:* donna.drogos@acgov.org)
Mark Detterman, ACEH (*Sent via E-mail to:* mark.detterman@acgov.org)
Geotracker, File

RESPONSIBLE PARTY OF RECORD AS OF 07/22/2009

RO0000500, CHEVRON #9-1026, 3701 BROADWAY , Oakland, CA, 94611

Alameda County Environmental Health (ACEH) has the following information on record regarding the Responsible Party(ies) for the above referenced site. Please update the following information for our records. Should you have contact information regarding additional Responsible Parties, please correct the information accordingly. Also, please check the "e-mail preferred" box to receive all future correspondences and notifications by e-mail.

☐ E-mail Preferred ☐ Hardcopy Preferred

ACEH is requesting your e-mail address so that we can correspond with you quickly and efficiently regarding your case. Please note that ACEH respects your privacy. Your e-mail address will remain confidential and will not be provided to any third party.

Current Information	Corrections or Additions
FIRST1002 LAST1002 HEITZINGER ASSOC PO BOX 1613 PEBBLE BEACH CA 93953	Name: _____ Company: _____ Address: _____ City: _____ State: _____ Zip: _____ E-mail: _____ Home Phone: (____) _____ Office Phone: (____) _____ Cell Phone: (____) _____
AARON COSTA CHEVRON CORPORATION 6111 BOLLINGER CANYON ROAD RM 3660 SAN RAMON CA 94583 ACOSTA@CHEVRON.COM 9255432961 6504444481	Name: _____ Company: _____ Address: _____ City: _____ State: _____ Zip: _____ E-mail: _____ Home Phone: (____) _____ Office Phone: (____) _____ Cell Phone: (____) _____
GARY BANKHEAD KAISER FOUNDATION HOSPITALS 100 SAN LEANDRO BLVD SAN LEANDRO CA 94577 GARY.J.BANKHEAD@KP.ORG 5106185886	Name: _____ Company: _____ Address: _____ City: _____ State: _____ Zip: _____ E-mail: _____ Home Phone: (____) _____ Office Phone: (____) _____ Cell Phone: (____) _____

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

July 24, 2009

HEITZINGER ASSOC
PO BOX 1613
PEBBLE BEACH CA 93953

AARON COSTA
CHEVRON CORPORATION
6111 BOLLINGER CANYON ROAD
RM 3660
SAN RAMON CA 94583

GARY BANKHEAD
KAISER FOUNDATION
HOSPITALS
100 SAN LEANDRO BLVD
SAN LEANDRO CA 94577

Subject: Fuel Leak Case No. RO0000500 and Geotracker Global ID T0600100334, CHEVRON #9-1026, 3701 BROADWAY, Oakland CA 94611 – Groundwater Monitoring Requirements

Dear Responsible Party:

The purpose of this correspondence is to inform you of changes to groundwater monitoring requirements for all fuel leak cases in California. The California State Water Resources Control Board (State Water Board) has approved Resolution No. 2009-0042 (*Actions to Improve Administration of the UST Cleanup Fund and UST Cleanup Program*). Resolution No. 2009-0042 states that, "*Regional Water Board and LOP agencies shall reduce quarterly groundwater monitoring requirements to semiannual or less frequent monitoring at all site unless site-specific needs warrant otherwise and shall notify all responsible parties of the new requirements no later than August 1, 2009. If more than semiannual monitoring is required for a case, the responsible party and State Water board shall be notified of the rationale and the notice shall be posted on Geotracker.*"

In accordance with Resolution No. 2009-0042, groundwater monitoring for your site is to continue with annual monitoring unless site-specific needs warrant otherwise.

If you have any questions, please call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark E. Detterman, PG, CEG
Hazardous Materials Specialist
Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Charlotte Evans, CRA, 5900 Hollis St, Suite A, Emeryville, CA 94608
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (*Sent via E-mail to:* lgriffin@oaklandnet.com)
Donna Drogos, ACEH (*Sent via E-mail to: donna.drogos@acgov.org*)
Mark Detterman, ACEH (*Sent via E-mail to: mark.detterman@acgov.org*)
Geotracker, File

RESPONSIBLE PARTY OF RECORD AS OF 07/22/2009

RO0000500, CHEVRON #9-1026, 3701 BROADWAY , Oakland, CA, 94611

Alameda County Environmental Health (ACEH) has the following information on record regarding the Responsible Party(ies) for the above referenced site. Please update the following information for our records. Should you have contact information regarding additional Responsible Parties, please correct the information accordingly. Also, please check the "e-mail preferred" box to receive all future correspondences and notifications by e-mail.

☐ E-mail Preferred ☐ Hardcopy Preferred

ACEH is requesting your e-mail address so that we can correspond with you quickly and efficiently regarding your case. Please note that ACEH respects your privacy. Your e-mail address will remain confidential and will not be provided to any third party.

Current Information	Corrections or Additions
FIRST1002 LAST1002 HEITZINGER ASSOC PO BOX 1613 PEBBLE BEACH CA 93953	Name: _____ Company: _____ Address: _____ City: _____ State: _____ Zip: _____ E-mail: _____ Home Phone: (____) _____ Office Phone: (____) _____ Cell Phone: (____) _____
AARON COSTA CHEVRON CORPORATION 6111 BOLLINGER CANYON ROAD RM 3660 SAN RAMON CA 94583 ACOSTA@CHEVRON.COM 9255432961 6504444481	Name: _____ Company: _____ Address: _____ City: _____ State: _____ Zip: _____ E-mail: _____ Home Phone: (____) _____ Office Phone: (____) _____ Cell Phone: (____) _____
GARY BANKHEAD KAISER FOUNDATION HOSPITALS 100 SAN LEANDRO BLVD SAN LEANDRO CA 94577 GARY.J.BANKHEAD@KP.ORG 5106185886	Name: _____ Company: _____ Address: _____ City: _____ State: _____ Zip: _____ E-mail: _____ Home Phone: (____) _____ Office Phone: (____) _____ Cell Phone: (____) _____

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

MAY - 4 2006

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

May 1, 2006

Mr. Mark Inglis
Chevron
6001 Bollinger Canyon Rd., Rm K2256
San Ramon, CA 94583-2324

Mr. Tim Havel
Director, Western Environmental, Health and Safety Service Hub
Kaiser Permanente
100 S. Los Robles, Ste. 410
Pasadena, CA 91188

Dear Messrs. Inglis and Havel:

Subject: Fuel Leak Cases RO500 and RO205, 3701 and 3741 Broadway, Oakland, CA 94611 (Proposed Kaiser Development)

Alameda County Environmental Health (ACEH) staff has reviewed the March 6, 2006 Soil Characterization Report Kaiser Oakland MOB 3701-3757 Broadway Oakland, California prepared by Secor, Cambria's April 13, 2006, Waste Profile for Disposal Workplan and Cambria's April 18, 2006 Soil and Groundwater Management Plan Planned Site Excavation for 3701 Broadway. As you are aware, our office is working with Chevron with their investigation at their former service station at 3701 Broadway as well as overseeing the releases observed on 3735-3737 and 3741 Broadway, properties owned by Kaiser. We previously offered comment to the Secor December 22, 2005 *Additional Characterization Work Plan* in the County's 1/31/06 letter. That work plan followed up the February 10, 2004 Secor *Phase II Environmental Site Assessment Report*. Unfortunately, it appears our comments were not incorporated in the recent investigation. Although the investigation was helpful with Chevron's evaluation of soil impacts at 3701 Broadway, it appears that there are still data gaps to address prior to concurrence for redevelopment or site closure. We recommend Chevron and Kaiser work together to address the following technical comments and submit the technical reports requested below.

TECHNICAL COMMENTS

1. 3701 Broadway- Multiple borings and soil samples on this property were analyzed and reported in Secor's March 6, 2006 report. Although we previously recommended sampling to depths necessary to define the vertical extent of contamination and the sampling of groundwater, this was not done. Chevron's Soil and Groundwater Management Plan (SGMP) proposes to excavate the entire site, to the extent possible, to a maximum depth of ~18' bgs. A drainage system is proposed to direct groundwater to a sump basin that will then be pumped to a holding tank for proper disposal. Please address the following questions/concerns:

- How will the vertical extent of contamination be determined, particularly in the locations where concentrations appear to be increasing with depth and where these concentrations exceed cleanup levels?
- The inability to collect sidewall confirmation samples poses a problem when attempting to estimate risk to occupants of the proposed subsurface building. There is a potential that the floor confirmation samples will underestimate actual residual concentrations. An attempt to estimate sidewall samples should be done, possibly at some intermediate stage of the excavation. Please provide a supplemental sampling proposal.
- Please provide a diagram of the proposed drainage system. Please indicate how the source areas were identified and how they will be treated by the drainage system. How and with what frequency will groundwater be sampled? Will the system allow preferential drainage from specific areas? What will determine the duration of the groundwater removal system?
- Please clarify the specific site development planned for the 3701 Broadway site and the other properties by providing our office a copy of these plans. The SGMP states that a subsurface building at a depth of 15' bgs is proposed. Will a moisture vapor barrier be used?
- Please provide proposed cleanup levels for soil and groundwater at the site. Those of Chevron appear to differ from those proposed by Secor in behalf of Kaiser.
- We concur that a risk assessment should be performed and approved prior to site development.
- The Waste Profile for Disposal Workplan proposes 13 soil borings advanced to approximately 20' bg to characterize the residual concentrations. Shallower samples will characterize soil for disposal purposes. Given the amount of information already known at the site, the locations of these samples should be selected authoritatively not randomly. Please provide a sampling plan and sampling rationale. As mentioned, all efforts should be taken to define contaminants vertically to below cleanup levels. As noted in the SGMP, some soil samples should also be analyzed for TPHd and TPHmo in addition to TPHg, BTEX and lead.

2. Please provide a copy of the Phase I investigation for the other properties of this site ie 3741, 3735-3737 and 3751-3757 Broadway. This information is necessary to determine the adequacy of the sampling performed at these sites.

3. 3741 Broadway- This address is the area identified on the Val Strough Honda lot where the main sales office, storage room with a door covering the floor and a floor drain were located. The prior Secor investigation identified elevated levels of TPHmo, TPHd and heavy metals in soil samples. Based on the results of the 1/06 investigation the extent of TPH and metals contamination appears limited to near SB-12 and SB-32. Will these areas be excavated prior to development?

4. 3735-3737 Broadway- This address is the area where the former Rainbow Car Wash, sump and three underground storage tanks had been located. Based the limited sampling of the initial Secor investigation, results from boring B6 indicate a significant release to groundwater may have occurred from the former underground tanks. We recommended additional sampling be done to determine the limits of this release to groundwater. Since no sampling was performed in the 1/06 investigation

it is unclear to what extent the 3701 Broadway site has been impacted by this release. The former USTs on this site must be further investigated. Please provide a work plan to determine the extent of soil and groundwater contamination from this area. In the absence of any tank removal data, we recommend sampling the former tank pit area. It is also noted that elevated petroleum contamination was detected in soil samples on the 3701 Broadway site along the boundary with this site. It is unclear which site(s) are the source(s) of the contamination, however, additional soil and groundwater characterization on the 3735-3737 Broadway property is required to delineate this detected contamination. We require Chevron and Kaiser work together and include this investigation in the requested work plan.

5. 3751-3757 Broadway- This address is indicated as where repair and service occurred. Two additional samples were taken in the 1/06 investigation. It appears that there may be localized TPH mo and TPHd as reported in SB-48. Please determine if this result is consistent with your Phase I results or whether additional sampling is warranted.

TECHNICAL REPORT REQUEST

Please submit the technical information according to the following schedule:

- July 3, 2006- Written response to above items, sampling plan for sidewalls, diagram for drainage system, copy of development plans, proposed cleanup levels, post-excavation sampling plan, sampling plan for 3735-3737 Broadway and Phase I reports.
- 90 days after soil and groundwater investigation- Risk Assessment

ELECTRONIC SUBMITTAL OF REPORTS

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at barney.chan@acgov.org.

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.

If you have any questions, please call me at (510) 567-6765.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions (Messrs. Foss & Hoehn)

cc: files, D. Drogos
Mr. Greg Hoehn, Secor, 57 Lafayette Circle, 2nd Floor, Lafayette, CA 94549
Mr. Bob Foss, Cambria, 5900 Hollis Street, Suite A, Emeryville, CA 94608
Mr. Jay Asercion, Kaiser Permanente, 1100 San Leandro Blvd., Suite 200, San Leandro, CA 94577

4_27_06 3701_3757 Broadway

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)

SECOR

SECOR
INTERNATIONAL
INCORPORATED

www.secor.com

57 Lafayette Circle, 2nd Floor
Lafayette, CA 94549
925-299-9300 TEL
925-299-9302 FAX

May 26, 2006

Mr. Barney Chan
Alameda County Environmental Health Services
Environmental Protection
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Re: Response to May 1, 2006 ACEH Letter
3701 And 3741 Broadway, Oakland, California
Proposed Kaiser Permanente Development
Fuel Leak Cases RO500 and RO205

Dear Mr. Chan:

SECOR International Incorporated (SECOR) on behalf of Kaiser Foundation Health Plan, Inc. (Kaiser Permanente) is pleased to present this response to your letter dated May 1, 2006, which provided technical comments to recent documents submitted by SECOR and Cambria Environmental Technology, Inc. (Cambria). These documents presented recent characterization work performed at 3701-3757 Broadway, the site of pending redevelopment by Kaiser Permanente.

The project site currently consists of several addresses: 3701 Broadway (former Chevron retail gasoline site), and 3735-3737, 3741, and 3751-3757 Broadway (former Honda car dealership). SECOR is the environmental consultant for Kaiser Permanente during redevelopment of the site into a medical office building. Cambria is the environmental consultant for Chevron, who is responsible for environmental remediation at the former gasoline retail site located at 3701 Broadway.

Because your May 1, 2006 letter addressed documents prepared by SECOR and Cambria, both parties will provide responses to you separately. This letter addresses technical comments applicable to work being completed on behalf of Kaiser Permanente and SECOR's involvement at the site at this time. The following sections list the comments pertaining to work being completed, followed by our response.

Technical Comment #1, Part 4:

'Please clarify the specific site development planned for the 3701 Broadway site and the other properties by providing our office a copy of these plans. The SGMP [Soil and Groundwater Management Plan, prepared by Cambria] states that a subsurface building at a depth of 15' bgs is proposed. Will a moisture vapor barrier be used?'

Response:

Kaiser Permanente's architect is producing a set of design drawings for submission to Alameda County Environmental Health Services. It is Kaiser Permanente's understanding that a moisture barrier will be used, and that the structure's surface treatment has been designed to withstand chemical constituents in soil and groundwater.

Technical Comment #1, Part 5:

'Please provide proposed cleanup levels for soil and groundwater at the site. Those of Chevron appear to differ from those proposed by SECOR (on) behalf of Kaiser.'

Response:

In previous reports, SECOR compared site chemical data to residential Environmental Screening Levels (ESLs) developed by the San Francisco Bay Regional Water Quality Control Board. In documents prepared by Cambria on behalf of Chevron, Cambria has compared data collected from 3701 Broadway to industrial ESLs. Remediation of site soil and groundwater to levels below residential ESLs is generally considered protective of 'unrestricted' development, and this conservative approach is appropriate until the development of site-specific cleanup goals, if necessary. It is our understanding that Chevron, through their actions at this time, will not be completing their environmental responsibilities, but is utilizing upcoming site development excavation as an aid in removing potentially impacted subsurface materials.

Technical Comment #2:

'Please provide a copy of the Phase I investigation for the other properties of this site ie 3741, 3735-3737, and 3751-3757 Broadway. This information is necessary to determine the adequacy of the sampling performed at these sites.'

Response:

SECOR, on behalf of Kaiser Permanente, will forward a printed copy of the Phase I performed at 3701-3757 Broadway.

Technical Comment #3:

'3741 Broadway – This address is the area identified on the Val Strough Honda lot where the main sales office, storage room with a door covering the floor and a floor drain were

located. The prior SECOR investigation identified elevated levels of TPHmo, TPHd, and heavy metals in soil samples. Based on the results of the 1/06 investigation the extent of TPH and metals appears limited to near SB-12 and SB-32. Will these areas be excavated prior to development?'

Response:

Elevated concentrations of metals and petroleum hydrocarbons observed in soils at the rear of 3741 Broadway appear to be related to historical discharges of materials through floor drains, which empty through a false floor onto the underlying soil. Additional soil sampling has confirmed that elevated chemical concentrations are limited to these soils beneath the rear of the building. This area will be excavated following building demolition, and soils will be disposed of appropriately. Excavation, soil disposal, and confirmation sampling tasks will be described in a soil management plan developed and submitted prior to wholesale redevelopment activities.

Technical Comment #4:

'3735-3737 Broadway – This address is the area where the former Rainbow Car Wash, sump and three underground storage tanks had been located. Based (on) the limited sampling of the initial SECOR investigation, results from boring B6 indicate a significant release to groundwater may have occurred from the former underground tanks. We recommend additional sampling be done to determine the limits of this release to groundwater. Since no sampling was performed in the 1/06 investigation, it is unclear to what extent the 3701 Broadway site has been impacted by this release. The former USTs on this site must be further investigated. Please provide a work plan to determine the extent of soil and groundwater contamination from this tank pit area. It is also noted that elevated petroleum contamination was detected in soil samples on the 3701 Broadway site along the boundary with this site. It is unclear which site(s) are the source(s) of the contamination, however, additional soil and groundwater characterization on the 3735-3737 Broadway property is required to delineate this detected contamination. We require Chevron and Kaiser Permanente work together and include this investigation in the requested work plan.'

Response:

Kaiser Permanente will be investigating properties (3781 through 3799 Broadway) to the north of the former Val Strough Honda dealership as part of future property acquisition due diligence. Based on information acquired during the Phase I environmental site assessment for the properties 3781 through 3799 Broadway, Phase II activities will be performed to investigate suspect areas identified during the Phase I. The scope of work to perform the Phase II investigation of 3781 through 3799 Broadway will be detailed in a forthcoming work plan. In conjunction with the Phase II due diligence, Kaiser Permanente will include steps in the work plan to more completely investigate impacts to soil and groundwater originating from the former USTs at 3735-3737 Broadway. Kaiser Permanente will work with, and seek Alameda County approval for all investigatory work plans prior to performing the work.

Technical Comment #5:

'3751-3757 Broadway – This address is indicated as where repair and service occurred. Two additional samples were taken in the 1/06 investigation. It appears that there may be localized TPHmo and TPHd as reported in SB-48. Please determine if this result is consistent with your Phase I results or whether additional sampling is warranted.'

Response:

SECOR's Phase I did not identify potential sources of chemical impact aside from the site's history as a vehicle repair shop. Concentrations of petroleum hydrocarbons detected in soils beneath 3751-3757 Broadway appear to be incidental and not indicative of a major release. Removal of these soils and confirmation sampling will be addressed in a soil management plan (see the Response to Technical Comment #3).

Through this letter, Kaiser Permanente and SECOR believe we have responded to your technical comments. Kaiser Permanente and SECOR would be happy to arrange a meeting with you, Chevron, and Cambria, prior to developing additional documentation for your review and files. The goal of this meeting would be to familiarize you with our currently envisioned site redevelopment activities progress of site investigation activities, and to discuss associated environmental issues.

If you have any questions regarding this letter, please contact David Grede at Kaiser Permanente at (510) 987-3143, or the undersigned at (925) 299-9300.

Sincerely,

SECOR International Incorporated

Greg Hoehn
Principal Geologist

Cc: Jay Asercion, Kaiser Permanente
Tim Havel, Kaiser Permanente
Dave Grede, Kaiser Permanente
Mark Inglis, Chevron
Laura Genin, Cambria

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

June 13, 2006

Mr. Mark Inglis
Chevron
6001 Bollinger Canyon Rd., Rm K2256
San Ramon, CA 94583-2324

Mr. Tim Havel
Director, Western Environmental, Health and Safety Service Hub
Kaiser Permanente
100 S. Los Robles, Ste. 410
Pasadena, CA 91188

JUN 16 2006

Dear Messrs. Inglis and Havel:

Subject: Fuel Leak Cases RO500 and RO205, 3701 and 3741 Broadway, Oakland, CA 94611 (Proposed Kaiser Development)

Alameda County Environmental Health (ACEH) staff has reviewed the May 24, 2006 Proposed Kaiser Development and the June 12, 2006 Well Destruction Workplan by Cambria and the January 12, 2004 Phase I Environmental Site Assessment Report and the May 26, 2006 response letter report by Secor, all responding to the County's May 1, 2006 letter. It appears that the County concerns have been adequately addressed. We have the following observations and technical report requests.

TECHNICAL COMMENTS

1. 3701 Broadway-
   - Vertical Delineation of Hydrocarbons will be addressed by advancing borings in locations where prior results exceeded environmental screening levels. The borings will be advanced to a maximum depth of 30' to determine the vertical extent of contamination. In addition, an area around SB-38, where elevated lead was detected will also be sampled for this analyte.
   - Sidewall sampling approximately every 20 linear feet along the excavation, sampled at five-foot intervals will be performed.
   - The drainage system proposed will be done to facilitate the excavation and not as a remediation method since the rate and amount of water removed is unknown. After completion of the excavation, please provide an estimate of the amount of hydrocarbons removed from the dewatering in your excavation report.
   - A set of the requested design drawings for the development will be provided from Kaiser as soon as available. Kaiser states that a moisture vapor barrier is presumed to be included.
   - It appears that there still is a difference in the cleanup levels proposed by Chevron and Kaiser. Site cleanup levels must be consistent with the future use of the property and site closure will be recommended based upon your meeting the appropriate cleanup levels. Your risk assessment should verify this.
   - Three borings located within the excavation limits of the former waste oil tank will be analyzed for TPHd and TPHmo in addition to TPHg, BTEX and lead.
   - The monitoring well decommissioning work plan for the six on-site wells is approved to accommodate the proposed site excavation. The off-site wells must either be sampled or properly decommissioned. Wells E and F have been paved over and not sampled since 3/03. It is uncertain whether these wells monitor the extent of the

plume since free product on-site and non-detectable concentrations off-site have been reported for years. Please include a proposal for wells E & F and a discussion of the extent of plume delineation in your well decommissioning report.

2. A copy of the Phase I investigation for the other properties of this site ie 3741, 3735-3737 and 3751-3757 Broadway has been provided by Secor. Based upon this report no additional areas of chemical concern were identified.

3. 3741 Broadway- This address is the area identified on the Val Strough Honda lot where the main sales office, storage room with a door covering the floor and a floor drain were located. The areas near SB-12 and SB-32 with elevated TPH and metals contamination will be excavated and re-sampled according to a soil management plan. Please submit the plan prior to excavation.

4. 3735-3737 Broadway- This address is the area where the former Rainbow Car Wash, sump and three underground storage tanks had been located. Kaiser will provide a work plan to complete investigation of soil and groundwater impacts associated with the former USTs at this site.

5. 3751-3757 Broadway- The localized TPH mo and TPHd contamination reported in SB-48 will be excavated and re-sampled according to the referenced soil management plan.

TECHNICAL REPORT REQUEST

Please submit the technical information according to the following schedule:

- 90 days after excavation of 3701 Broadway- Confirmation soil sampling (Excavation) report, design drawings for development, risk assessment, monitoring well decommissioning report and extent of plume discussion.
- 30 prior to hot spot excavation- Soil Management Plan and work plan for soil and groundwater investigation of 3735-3737 Broadway.

ELECTRONIC SUBMITTAL OF REPORTS

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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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1,
2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at barney.chan@acgov.org.

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.

If you have any questions, please call me at (510) 567-6765.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: files, D. Drogos
Mr. Greg Hoehn, Secor, 57 Lafayette Circle, 2nd Floor, Lafayette, CA 94549
Mr. Bob Foss, Cambria, 5900 Hollis Street, Suite A, Emeryville, CA 94608
Mr. Jay Asercion, Kaiser Permanente, 1100 San Leandro Blvd., Suite 200, San Leandro, CA 94577

6_12_06 3701_3757 Broadway

Appendix B

Documentation of Backfill Material

SYAR INDUSTRIES, INC.
2301 NAPA-VALLEJO HWY. • P.O. BOX 2540 • NAPA, CA 94558-0524
PHONE: 707/252-8711 • FAX: 707/224-5932

May 29, 2007

BALCH PETROLEUM CONTRACTORS &
BUILDERS INC
PO BOX 361230
MILPITAS CA 95035

Re: Certificate of Compliance
Import Fill
Chevron
MacArthur Blvd
Oakland, California

Gentlemen:

This letter will certify that the Import Fill, aka 3" Minus, that was supplied to the above mentioned project from our Lake Herman Plant on the 13th, 14th and 18th of September, 2006, would've had the following test results. This material is 100% virgin quarried basalt.

Import Fill Material

English Sieve Size	Metric Sieve Size	Percent Passing
2 1/2"	63.5-mm	100
1"	25-mm	81
#4	4.75-mm	35
#200	75-µm	8

	Test	Test Results
R-Value	CAL#217	50
Liquid Limit	ASTM D-4318	36
Plasticity Index	ASTM D-4318	12-14

If we may be of any further assistance, please contact us.

Sincerely,

Bill Bond
Quality Control Manager

BB:dp

cc: Lake Herman Plant (Black)
Material File No. 10152 (S)

SYAR INDUSTRIES, INC.
2301 NAPA-VALLEJO HWY. • P.O. BOX 2540 • NAPA, CA 94558-0524
PHONE: 707/252-8711 • FAX: 707/224-5932

May 29, 2007

BALCH PETROLEUM CONTRACTORS &
BUILDERS INC
PO BOX 361230
MILPITAS CA 95035

Re: Typical Gradation
1 1/2" x 3/4" Drain Rock
Chevron
MacArthur Blvd
Oakland, California

Gentlemen:

Please find the typical gradation for the 1 1/2" x 3/4" Drain Rock, that was supplied to the above mentioned project from our Lake Herman Plant on the 11th and 12th of September, 2006. This material is 100% virgin quarried basalt.

1 1/2" x 3/4" Crushed Drain Rock

English Sieve Size	Metric Sieve Size	Percent Passing
2"	50-mm	100
1 1/2"	37.5-mm	97
1"	25-mm	45
3/4"	19-mm	8
3/8"	9.5-mm	1

If we may be of any further assistance, please contact us.

Sincerely,

Bill Bond
Quality Control Manager

BB:dp

cc: Lake Herman Plant
Material File No. 10152 (S)

SYAR INDUSTRIES, INC.
2301 NAPA-VALLEJO HWY. • P.O. BOX 2540 • NAPA, CA 94558-0524
PHONE: 707/252-8711 • FAX: 707/224-5932

May 29, 2007

BALCH PETROLEUM CONTRACTORS &
BUILDERS INC
PO BOX 361230
MILPITAS CA 95035

Re: Certificate of Compliance
Class 2 Permeable
Chevron
MacArthur Blvd
Oakland, California

Gentlemen:

This letter will certify that the Class 2 Permeable, that was supplied to the above mentioned project from our Lake Herman Plant on the 11th of September, 2006, will comply with Section No. 68 in the July 1999 & May 2006 Caltrans Standard Specifications as well as the July 2002 Standard Specifications for Construction of Local Streets and Roads. This material is 100% virgin quarried basalt.

Class 2 Permeable

English Sieve Size	Metric Sieve Size	Percent Passing	Specification Requirements
1"	25-mm	100	100
3/4"	19-mm	98	90-100
3/8"	9.5-mm	58	40-100
#4	4.75-mm	33	25-40
#8	2.36-mm	22	18-33
#30	600-µm	8	5-15
#50	300-µm	4	0-7
#200	75-µm	1	0-3

Test Name	CA Test Number	Test Results	Specification Requirements
Durability Index	229	54	40 Min.
Sand Equivalent	217	81	75 Min.

If we may be of any further assistance please contact us.

Sincerely,

Bill Bond
Quality Control Manager

BB:dp

cc: Lake Herman Plant
Material File No. 10152 (S)