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

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January 30, 2008

Mr. Tom Bauhs
Chevron Environmental Management Company
P.O. Box 6012, K2204
San Ramon, CA 94583

Ms. Julie Beck Ball
Ms. Helen Beck Kleeman
Mr. Peter Reinhold Beck
2720 Broderick Street
San Francisco, CA 94123

Subject: SLIC Case No. RO0002466 and Geotracker Global ID T06019744728, Park Street Landing 2301-2337 Blanding Avenue, Alameda, CA 94501

Dear Mr. Bauhs and Ms. Ball:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Soil Boring and Vapor Point Installation Work Plan," dated January 10, 2008. The Work Plan proposes advancing four soil borings and installing four soil vapor probes. We have several technical comments that request modifications to the proposed scope of work. However, the proposed scope of work may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during the field investigation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed.

We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

REQUEST FOR INFORMATION

We request that you submit copies of the following reports, which are referenced in existing site investigation reports but are not in the ACEH case file:

- CET Environmental Services, Preliminary Site Assessment, January 13, 1995.

TECHNICAL COMMENTS

1. **Proposed Soil Borings for Metals Analyses.** Elevated concentrations of arsenic were detected in soil samples collected from soil borings SB-3, SB-4, SB-5, and SB-6. The Work Plan indicated some uncertainty as to whether arsenic was detected at a concentration of

130 milligrams per kilogram (mg/kg) in a soil sample from boring SB-6 or SB-8. ACEH reviewed the laboratory reports to confirm that the detection of arsenic at a concentration of 130 mg/kg was in a soil sample from boring SB-6 rather than SB-8. No soil samples have been collected southeast of SB-3. Therefore, analyses of soil samples for metals is required for soil samples from proposed soil boring SB-14. In addition, analyses for metals is required for soil samples from proposed soil borings SB-15 and SB-16 based on the elevated concentration of metals detected in black granular material that was observed in soil boring GSW-7. We also request that one additional soil boring (SB-18) be advanced outside of the former AST footprint between sampling locations SB-3 and SB-6 as shown on the Attachment A – Additional Sampling Locations. Please see technical comment 2 regarding laboratory analyses for soil samples.

2. **Depth of Soil Borings.** Based on the depth to groundwater previously encountered in monitoring well MW-1, it may be necessary to extend the proposed soil borings to depths greater than 10 feet bgs in order to obtain grab groundwater samples. The borings may be extended up to 13 feet bgs in order to collect a grab groundwater sample from first encountered groundwater.

3. **Soil Sampling and Analyses.** The Work Plan proposes that soil samples be collected for laboratory analyses from fixed depth intervals of approximately 1 and 5 feet bgs in each boring. We request that soil samples be collected continuously in the field for logging and screening as the boring is advanced. Field screening is to be conducted by a qualified field geologist using visual observations, odor, and measurements using a field photoionization detector (PID) fitted with an appropriate lamp and calibrated for the chemicals of concern. Soil samples are to be extracted from the continuous cores at frequent intervals and placed in sealed jars or plastic bags for measurement and recording of VOC concentrations in the headspace using the PID. Soil samples are to be collected for laboratory analysis from any zones where visible staining, odor, or elevated PID readings are observed. For borings SB-15 through SB-17, we request that soil samples be collected for laboratory analysis from any layer similar in appearance to the black granular material described in boring GWS-7. If no visible staining, odor, granular material, or elevated PID readings are observed, the collection of soil samples at the proposed fixed intervals of 1 and 5 feet bgs from each boring is acceptable. We request that you submit samples for laboratory analyses as summarized in the table below. The analytical methods proposed in the Work Plan for total petroleum hydrocarbons as gasoline (TPHg) and TPH as diesel (TPHd) are acceptable. VOCs are to be analyzed for a full scan target list including chlorinated solvents using EPA Method 8260B rather than limiting the analyses to BTEX. Please present boring logs, screening results, and analytical data for soil and groundwater samples in the Site Investigation Report requested below.

Soil Boring	Media	Metals	TPHg	TPHd	VOCs
SB-13	Soil	X			If VOCs detected by PID
SB-13	Groundwater		X	X	X
SB-14	Soil	X	X	X	If VOCs detected by PID
SB-14	Groundwater		X	X	X
SB-15	Soil	X			If VOCs detected by PID
SB-15	Groundwater				X
SB-16	Soil	X	X	X	If VOCs detected by PID
SB-16	Groundwater				X
SB-17	Soil	X	X	X	If VOCs detected by PID
SB-17	Groundwater		X	X	X
SB-18	Soil	X	X	X	If VOCs detected by PID
SB-18	Groundwater		X	X	X
SB-19	Soil	X	X	X	If VOCs detected by PID
SB-19	Groundwater		X	X	X
MW-1	Groundwater	X	X	X	X

4. **Soil Vapor Sampling Locations.** The proposed soil vapor sampling locations and proposed analyses are generally acceptable. We request that two additional soil vapor probes be installed and sampled at the locations shown on Attachment A – Additional Sampling Locations. The proposed soil vapor analyses for VOCs must be modified to include chlorinated solvents and not limited to BTEX using EPA Method T0-15. Please present results from the soil vapor sampling in the Site Investigation Report requested below.

5. **Sampling Well MW-1.** We request that you also collect a groundwater sample from well MW-1 during the proposed scope of work. The groundwater sample from well MW-1 is to be analyzed for TPH as gasoline and diesel by EPA Method 8015, volatile organic compounds including BTEX, ethylene dibromide, 1,2-dichloroethane, and chlorinated solvents by EPA Method 8260, and total CAM17 metals by EPA Method 6010.

6. **Hydrogeologic Cross Section.** We requested that a hydrogeologic cross section be prepared to potentially assist in designing the proposed scope of work. The Work Plan indicates that cross sections will be included in the Site Investigation Report. Please prepare a hydrogeologic cross section that depicts the lateral and vertical extent of soil layers encountered, where groundwater was first encountered in borings and the static water levels, screen intervals in the monitoring well, observations of staining and odor, analytical results for soil and groundwater samples, and site features such as the former fuel pump and piping. In addition, the cross section must accurately show the depth of the seawall in relation to static water levels measured at the site. Please include the cross section in the Site Investigation Report requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **May 29, 2008** – Site Investigation Report

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

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).

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.

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) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Attachment A: Additional Sampling Locations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Mr. Brian Carey
Conestoga-Rovers & Associates
2000 Opportunity Drive, Suite 110
Roseville, CA 95678

Mr. Monroe Wingate
3030 Bridgeway, Suite 231
Sausalito, CA 94965

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Attachment A - Additional Sampling Locations

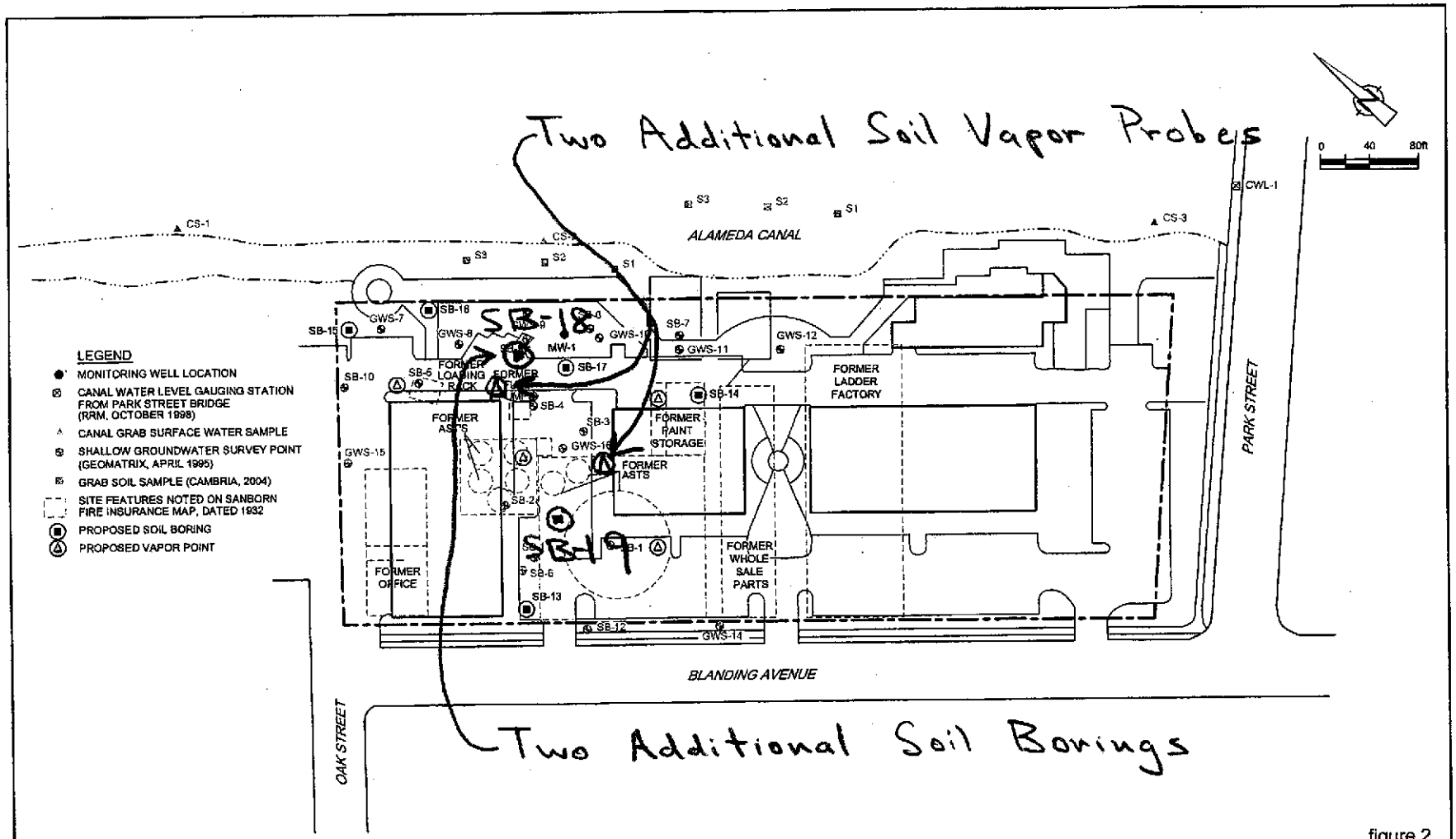

figure 2

SITE PLAN
CHEVRON # 206127 - FORMER SIGNAL OIL BULK PLANT
2301-2311 BLANDING AVENUE
Alameda, California

631816-201(PRES001)GN-WA002 JAN 11/2008