

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



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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April 2, 2009

Ms. Stacie H. Frerichs
Chevron Environmental Management Company
6011 Bollinger Canyon Road
San Ramon, CA 94583

Ms. Julie Beck Ball
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 Ms. Frerichs and Ms. Ball:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above referenced site including the recently submitted document entitled, "*Work Plan for Additional Site Investigation*," dated March 11, 2009 and prepared on Chevron's behalf by Conestoga-Rovers & Associates. The Work Plan proposes a scope of work that includes installation and sampling of additional monitoring wells, one boring in a former buried drum area to collect a grab groundwater sample, and sub-slab sampling within the two northwestern on-site buildings.

We have several technical comments that request modifications to the proposed scope of work. However, the proposed scope of work for well installation and groundwater sampling may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during the field investigation. Prior to implementing the proposed sub-slab sampling, we request that you provide proposed sub-slab sampling locations within the buildings in a Work Plan Addendum. As discussed in technical comment 5, advancing one boring in a former buried drum area to collect a grab groundwater sample is not required at this time. 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 reports described below **8**.

TECHNICAL COMMENTS

1. **Sub-Slab Sampling Locations.** The proposal to conduct sub-slab soil vapor sampling in the two northwestern buildings on the site is generally acceptable. The Work Plan indicates that the locations and numbers of sub-slab sampling points will be provided to ACEH after access agreements are completed. Please provide the proposed sub-slab sampling locations in a Work Plan Addendum no later than May 29, 2009.

2. **Sub-Slab Vapor Probes.** The Work Plan indicates that sub-slab vapor probes will be installed in accordance with the procedures outlined in the U.S. Environmental Protection Agency document entitled, "*Draft Standard Operating Procedure (SOP) for Installation of Sub-Slab Vapor Probes and Sampling Using EPA Method TO-15 to Support Vapor Intrusion Investigations.*" These guidelines are generally acceptable. Please assure that the gap between the probe and the concrete slab is completely sealed to prevent possible vapors intrusion through the slab into the building. The seal between the probe and slab must not have cracks or other openings that could potentially allow a preferential pathway for vapor migration through the slab. At a future date following completion of sub-slab sampling and site investigation activities, the probes are to be properly decommissioned. Any moisture or vapor barriers at the base of the slab must be repaired during probe decommissioning.
3. **Soil Sampling in Well Borings.** The proposal to collect soil samples at 5-foot intervals below 8 feet bgs is not acceptable. Soils must be logged continuously throughout the total depth of the boring in order to select the interval for well screen and filter pack placement. The soil borings are to be sampled 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 zones where visible staining, odor, or elevated PID readings are observed. Please present these results in the Site Investigation Report requested below.
4. **Well Installation.** The proposed locations of the five monitoring wells are acceptable. However, we request several modifications to the well installation methods in order to obtain representative water samples from a known interval and avoid possible issues associates with existing well MW-1. We request that the filter pack be no longer than 6 feet and be installed discretely within the coarse-grained layer where groundwater is expected to be first encountered. The screen and filter packs are not to extend through potential confining layers. Two of the proposed monitoring wells will be located in the area of boring SB-18. As an example, if a similar soil stratigraphy to that encountered in boring SB-18 (see attached boring log) is encountered in the well borings adjacent to boring SB-18, the filter packs for the wells should be installed within the lower Silty Sand unit between 10.5 and 16.5 feet bgs. Please also refer to the Hydrogeologic Cross Sections presented in the "*Site Investigation Report,*" dated October 14, 2008 in selecting the well screen and filter pack intervals. Please present the results of the well installation and initial groundwater sampling in the Site Investigation Report requested below.
5. **Groundwater Evaluation for Buried Drum Excavation.** As an attachment to an electronic mail message from James Kiernan of Conestoga-Rovers & Associates, we received a copy of a letter from ACEH to Ms. Julie Beck and Mr. Monroe Wingate dated October 31, 2001. The October 31, 2001 letter indicates that three soil borings were advanced in the area of the former buried drums in March 2000 and states that grab groundwater samples collected from the three borings did not contain TPHg, TPHd, BTEX, or MTBE. The October 31, 2001 letter was not in our case file and we

could not locate a report in the case files with the referenced March 2000 data. The October 31, 2001 ACEH letter was located in an archive and has now been entered into the case file. We request that you submit the report that includes the March 2000 groundwater data to complete the documentation. We concur that groundwater sampling is not necessary in the area of the former buried drums provided that the data were reported accurately in the October 31, 2001 letter. Therefore, the scope of work entitled Groundwater Quality Assessment – Former Buried Drum Area is not required at this time.

6. **Metals in Groundwater.** Data collected since 2001 indicate that the extent and concentrations of metals in soil are greater than suspected in 2001. Based on evaluation of the additional data collected since 2001, the conclusion stated in the ACEH letter dated October 31, 2001 that no further action is required for metals at the site is no longer valid. We request that groundwater samples from the five proposed monitoring wells be analyzed during the initial groundwater sampling event for CAM-17 metals in addition to the proposed analytes. Please present the results 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 31, 2009** – Sub-Slab Sampling Locations
- **August 7, 2009** – 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

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

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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

Attachments: Boring Log for SB-18 and Electronic mail message dated March 13, 2009

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Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Mr. Brian Silva, Conestoga-Rovers & Associates, 10969 Trade Center Drive, Suite 107, Rancho Cordova, CA 95670

Mr. James Kiernan, Conestoga-Rovers & Associates, 2000 Opportunity Drive, Suite 110
Roseville, CA 95678

Mr. Monroe Wingate, C/o Alan Wingate, 18360 Carriger Road, Sonoma, CA 95476

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Wickham, Jerry, Env. Health

From: Kiernan, James [jkiernan@croworld.com]
Sent: Friday, March 13, 2009 9:17 AM
To: Wickham, Jerry, Env. Health
Cc: monroewin@yahoo.com
Subject: 2307-2337 Blanding Ave; RO2466
Attachments: 631916 ACEH Letter 2001-10-31.pdf

Hi Jerry,

As you know, we just submitted our work plan for additional investigation at the Park Street Landing site, including groundwater sampling near the former buried drum as requested in your letter dated 11/10/08. However, attached is a copy of a letter dated 10/31/01 I just received from Monroe Wingate (property owner) after he reviewed the work plan; the letter grants no further action related to the buried drum and references groundwater sampling performed in March 2001. Were you aware of this letter? I did not see it in the ACEH online database, or the associated report, and they're obviously not in our files. Could they possibly be in your files? It appears this letter may have slipped through the cracks somewhere along the way. Mr. Wingate wasn't sure he had a copy of the report, he may have to request from Geomatrix. In any event, it appears the buried drum groundwater quality issue has already been addressed.

Interestingly, the letter also granted no further action pertaining to metals in soil, as the site was capped and a soil management plan was prepared to address any subsurface activity. However, during our recent investigation we did extensive sampling for metals. The letter also references the collection of a grab groundwater sample collected in the central portion of the site in which the dissolved metals concentrations did not exceed drinking water standards and applicable saltwater aquatic criteria. Again, although we have not seen a copy of the report, considering this data combined with the recent analysis from well MW-1, it appears the issue of metals in groundwater may also have already been adequately addressed.

Please let me know your thoughts on these matters. Thanks.

Sincerely,

James P. Kiernan, P.E.
Conestoga-Rovers & Associates (CRA)
2000 Opportunity Drive, Suite 110
Roseville, CA 95678
Direct: (916) 751-4102
Cell: (916) 919-6759
Fax: (916) 751-4199
jkiernan@croworld.com

Visit us at www.croworld.com

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Conestoga-Rovers & Associates
 2000 Opportunity Dr., #110
 Roseville, California 95678
 Telephone: (916) 677-3407
 Fax: (916) 677-3687

BORING/WELL LOG

CLIENT NAME	Chevron Environmental Management Co.	BORING/WELL NAME	SB-18
JOB/SITE NAME	Former Signal Oil Bulk Plant	DRILLING STARTED	07-Jul-08
LOCATION	2301-2311 Blanding Avenue, Alameda, CA	DRILLING COMPLETED	08-Jul-08
PROJECT NUMBER	631916 (20-6127)	WELL DEVELOPMENT DATE (YIELD)	NA
DRILLER	Woodward Drilling Co. Inc.	GROUND SURFACE ELEVATION	Not Surveyed
DRILLING METHOD	Hydraulic push	TOP OF CASING ELEVATION	Not Surveyed
BORING DIAMETER	2 inches	SCREENED INTERVAL	NA
LOGGED BY	C. Benedict	DEPTH TO WATER (First Encountered)	14.5 fbg (08-Jul-08)
REVIEWED BY	J. Kieman, PE# C68498	DEPTH TO WATER (Static)	NA
REMARKS	Hand-Augered/Airknifed to 8 fbg.		

WELL LOG (PID) I:\ROCK\IN\CHEVRON\631916-20-6127 ALAMEDA\631916-20-6127 BORING LOGS\20-6127 BORING LOGS.GPJ, DEFAULT.GDT, 10/14/08

PID (ppm)	BLOW COUNTS	SAMPLE ID	EXTENT	DEPTH (fbg)	U.S.C.S.	GRAPHIC LOG	LITHOLOGIC DESCRIPTION	CONTACT DEPTH (fbg)	WELL DIAGRAM
56.3		SB-18-1		0.5			Asphalt	0.5	
				4.0	SM		Silty SAND: Grey; moist; 60% sand, 20% silt, 10% clay, 10% gravel; low plasticity.	4.0	
114		SB-18-5		5	SC		Clayey SAND: Black; moist; 55% sand, 20% clay, 15% silt, 10% gravel (coarse angular); low plasticity.	6.0	
				6.0	CL		CLAY with sand: Grey with green mottling; moist; 45% clay, 30% sand, 20% silt, 5% gravel; medium plasticity.	6.0	
		SB-18-9.5		10			Silty SAND: Greenish grey; moist 55% sand (medium to fine grained), 30% silt, 10% clay; low plasticity.	10.5	
				15	SM		Brown with grey mottling; moist 55% sand, 30% silt, 10% clay; low plasticity.		
				15			Brown; wet; 75% sand, 15% silt, 10% clay; low plasticity.	16.0	Bottom of Boring @ 16 fbg

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)