



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-93

June 19, 2009

Mr. Mike Bauer
Chevron Environmental Management Company
145 S. State College Blvd.
Brea, CA 92821

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 Mr. Bauer 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, "*Addendum to Work Plan for Additional Site Assessment*," dated May 28, 2009 and prepared on Chevron's behalf by Conestoga-Rovers & Associates. The Work Plan Addendum presents subslab sampling locations as requested in our previous correspondence dated April 2, 2009.

As discussed in the technical comments below, the proposed sampling locations are not adequate to assess potential vapor intrusion for the on-site building at 2307 Blanding Avenue. Attachment 1 to this correspondence suggests alternate sub-slab locations that would be acceptable. Therefore, you may implement the proposed sub-slab sampling using the alternate locations shown on Attachment 1 or you may submit a Revised Work Plan Addendum that proposes alternate locations that address technical comment 2.

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 for 2317 Blanding Avenue.** The proposed sub-slab sampling locations for 2317 Blanding Avenue are acceptable and do not require revision. Please present the results in the Site Investigation Report requested below.
2. **Sub-Slab Sampling Locations for 2307 Blanding Avenue.** The purpose of the proposed sub-slab sampling is to assess potential vapor intrusion to the on-site buildings. The potential for vapor intrusion must be evaluated within the occupied spaces adjacent to the locations where elevated concentrations of volatile organic compounds have been detected in soil gas. In particular, the occupied spaces adjacent to soil vapor sampling location VP-4 must be evaluated. The proposed sub-slab sampling locations for 2307 Blanding Avenue are apparently located in storage areas that

are outside the areas of concern. The nearest proposed sub-slab sampling location is approximately 80 feet from VP-4. Given that the contamination may be within the vadose zone, the proposed locations are too far from the suspected sources and occupied spaces to evaluate potential vapor intrusion for 2307 Blanding Avenue. Attachment 1 to this correspondence suggests alternate sub-slab locations that would be acceptable. Therefore, you may implement the proposed sub-slab sampling using the alternate locations shown on Attachment 1 or you may submit a Revised Work Plan Addendum by July 2, 2009 that proposes alternate locations that address the issues discussed in this technical comment.

3. **Sub-Slab Vapor Probes.** The "*Work Plan for Additional Site Investigation*," dated March 11, 2009 and 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.

TECHNICAL REPORT REQUEST

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

- **July 2, 2009** – Revised Sub-slab Sampling Locations (if necessary, please see technical comment 2)
- **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

Mr. Mike Bauer
Ms. Julie Beck Ball
RO0002466
June 19, 2009
Page 3

SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/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.

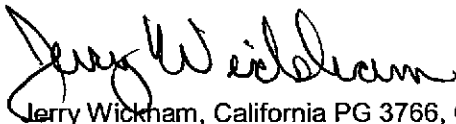
AGENCY OVERSIGHT

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.

Mr. Mike Bauer
Ms. Julie Beck Ball
RO0002466
June 19, 2009
Page 4

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 1: Alternate Sub-Slab Sampling Locations

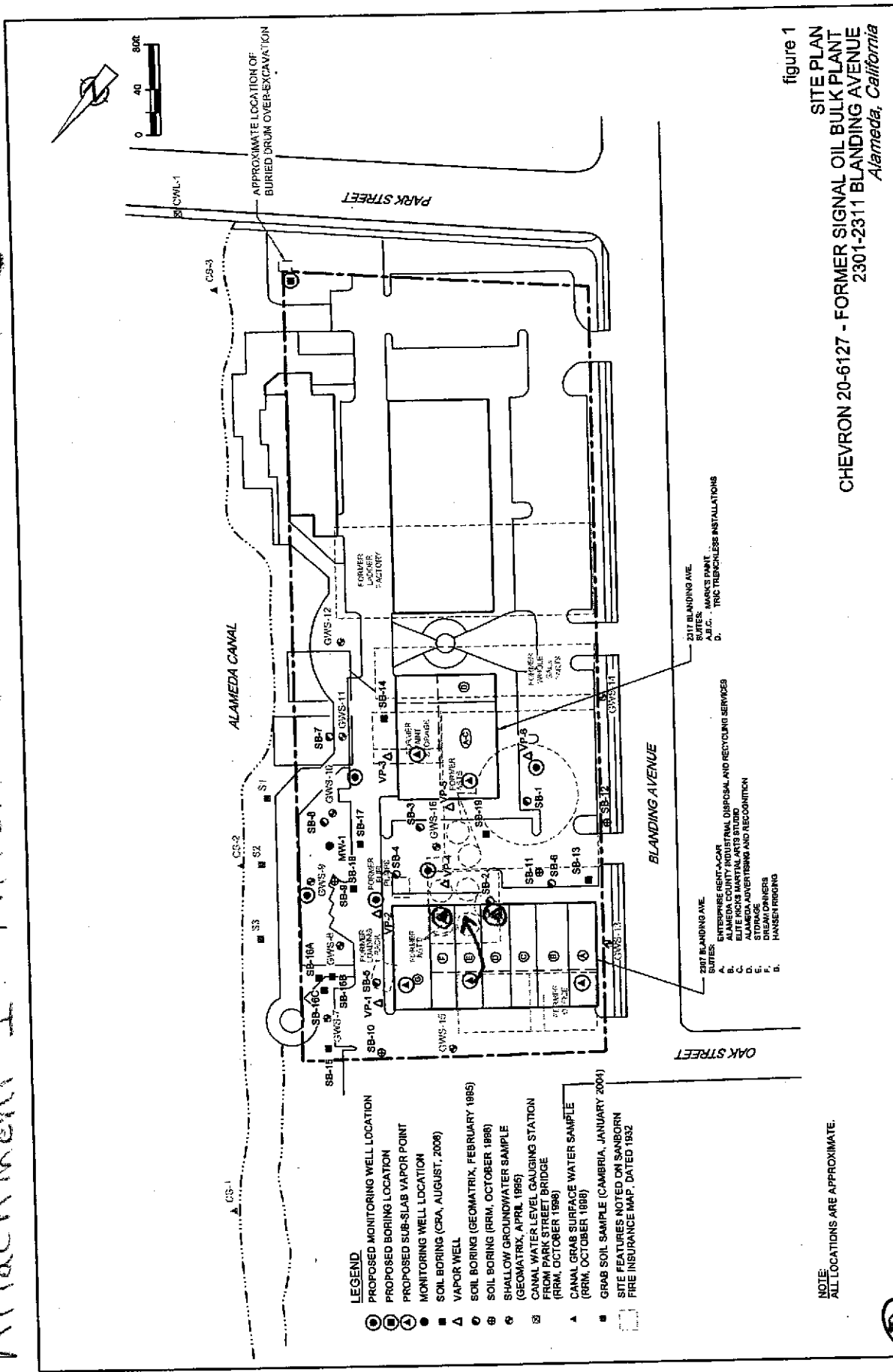
Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

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

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Attachment 1: Alternate Sub-Slab Sampling Locations



**Alameda County Environmental Cleanup
Oversight Programs
(LOP and SLIC)**

ISSUE DATE: July 5, 2005

REVISION DATE: March 27, 2009

PREVIOUS REVISIONS: December 16, 2005,
October 31, 2005

SECTION: Miscellaneous Administrative Topics & Procedures

SUBJECT: Electronic Report Upload (ftp) Instructions

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 My Le Huynh.
 - 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 @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) If site is a new case without an RO# use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.