

# **RECEIVED**

10:03 am, Jun 30, 2009

# Alameda County Environmental Health

Mike Bauer Project Manager Marketing Business Unit Chevron Environmental Management Company 145 S. State College Blvd Brea, CA 92821 Tel (714) 671-3200 Fax (714) 671-3440 mbauer@chevron.com

June 29, 2009

Mr. Jerry Wickham Alameda County Environmental Health 1131 Harbor Bay Parkway, Suite 250 Alameda, California 94502-6577

Re: Former Signal Oil Marine Storage and Distribution Facility

(Former Chevron Bulk Plant 20-6127)

2301-2311 Blanding Avenue

Alameda, California LOP Case RO0002466

Dear Mr. Wickham:

The purpose of this letter is to verify that as a representative for Chevron Environmental Management Company (Chevron), I reviewed, and concur with, the comments in the *Revised Sub-Slab Sampling Locations* for the referenced facility, prepared on behalf of Chevron by Conestoga-Rovers & Associates.

Please feel free to contact me at (714) 671-3207 if you have any questions.

Sincerely,

Mike Bauer Project Manager



10969 Trade Center Drive Rancho Cordova, California 95670

Telephone: (916) 889-8900 Fax: (916) 889-8999

www.CRAworld.com

June 29, 2009 Reference No. 631916

Mr. Jerry Wickham Alameda County Environmental Health (ACEH) 1131 Harbor Bay Parkway, Suite 250 Alameda, California 94502-6577

Re: Revised Sub-Slab Vapor Point Locations

Former Signal Oil Marine Storage and Distribution Facility

(Former Chevron Bulk Plant 20-6127)

2301-2311 Blanding Avenue

Alameda, California LOP Case RO0002466

Dear Mr. Wickham:

This letter documents our telephone discussion on June 24, 2009 regarding the sub-slab vapor point locations inside the building at 2307 Blanding Avenue, which is located on the site referenced above. As outlined in ACEH's correspondence dated June 19, 2009 (Attachment A), ACEH suggested alternate locations for the sub-slab sampling locations within Suites D, E and F at 2307 Blanding Avenue.

Per our discussion, we agreed to the following:

- The locations of the proposed sub-slab sampling points in Suites A and G will remain as originally proposed.
- The ACEH suggested alternate sub-slab vapor point locations in Suites D and F will be relocated to within Suite E adjacent to the interior walls. Suite E is not an active business and is only used for storage.
- One additional sub-slab vapor point will be installed in Suite E toward the center of the Suite (near the northwest extent of the former tank farm).

The revised sub-slab vapor point locations as wells as the previously approved locations are shown on Figure 1, attached.

Equal Employment Opportunity Employer



June 29, 2009 2 Reference No. 631916

We appreciate your assistance on this project. If you have any questions regarding the location of the sub-slab sampling locations, please contact me at (916) 889-8908.

Sincerely,

**CONESTOGA-ROVERS & ASSOCIATES** 

Greg Barclay, PG 6260

GREG BARCLAY No. 6260

BS/jt/4 Encl.

Figure 1 Site Plan

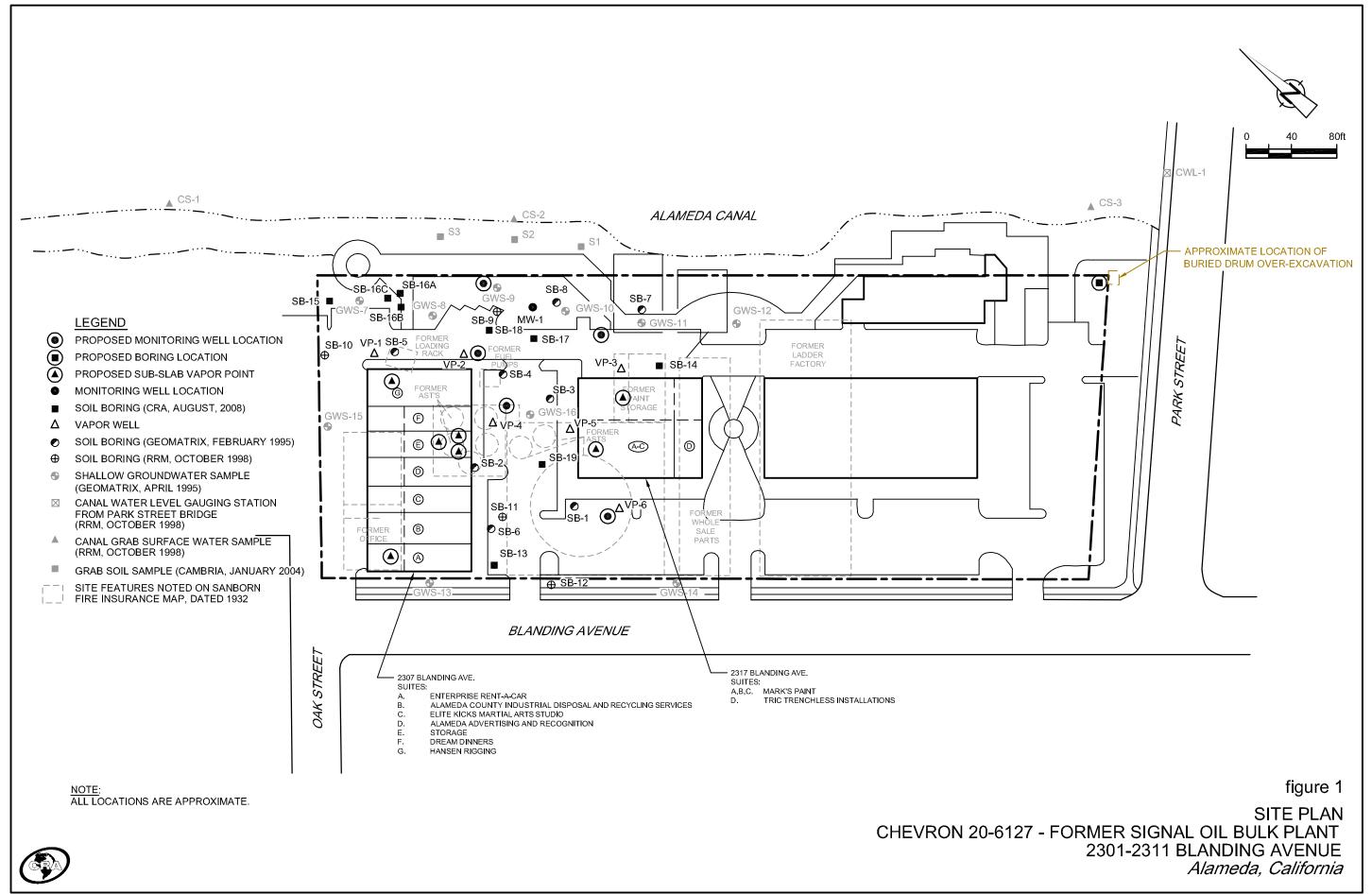
Attachment A ACEH June 19, 2009 Letter

cc: Mike Bauer, Chevron Environmental Management Company

Julie Beck Ball Peter Reinhold Beck

Monroe Wingate

Tom Foley, Gallagher & Miersch



# 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) 337-93

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 your 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

- 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

Mr. Mike Bauer Ms. Julie Beck Ball RO0002466 June 19, 2009 Page 2

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 your 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

