



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

October 23, 2009

Mr. Jeff Johnson  
Chevron Pipe Line Company  
4800 Fournace Place  
Bellaire, TX 77401-2324

Subject: SLIC Case No. RO0002892 and Geotracker Global ID SL0600100443, Chevron Sunol Pipeline, 2793 Calaveras Road, Sunol, CA. 94586 – Work Plan Approval

Dear Mr. Johnson:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted reports entitled, "*Soil Vapor Extraction System Evaluation and Work Plan for Additional Site Characterization*," dated September 9, 2009 (Work Plan) and "*SLIC Case RO0002892, Chevron Sunol Pipeline, 2793 Calaveras Road, Sunol, CA Second Quarter 2009 Groundwater Monitoring Report*," dated August 7, 2009. Both reports were prepared on behalf of Chevron Pipe Line Company by URS Corporation.

Chevron Pipe Line Company made a decision to discontinue soil vapor extraction at the site on July 23, 2009 until an "additional site characterization could be conducted to evaluate the extent and mass flux to groundwater of residual hydrocarbons at the base of the hillside." The Work Plan proposes a passive soil vapor sampling survey using Gore® Sorbers on the hillside and in the area across Calaveras Road. It is not clear that the proposed scope of work would achieve the stated objective. We note that a passive soil vapor sampling survey using Gore® Sorbers was conducted in 2007 in the area west of Calaveras Road in 2007 and was not successful in delineating petroleum hydrocarbons within the affected area. However, since the currently proposed survey area includes the hillside area, which has shallow soil as well as groundwater impacts, the survey may provide some information on the relative concentrations of petroleum hydrocarbons in soil vapor. Therefore, we have no objection to performing the proposed passive soil vapor sampling survey as a likely first phase of investigation with the caveat that additional investigation is expected to be necessary to achieve the stated objective.

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

#### **TECHNICAL COMMENTS**

1. **Presentation of Results.** Please present the results of the passive soil vapor sampling survey in a comprehensive report that includes a description of the sampling methods, data quality, factors affecting data quality, an evaluation of results, tables of results, and both general and detailed figures. Please also include recommendations for future actions based on these results.

2. **Groundwater Monitoring.** During the first and second quarters of 2009, total petroleum hydrocarbons as gasoline were detected for the first time in the two downgradient wells, MW-10 and MW-11. We concur with the recommendation to continue quarterly groundwater monitoring and to evaluate future results from these downgradient wells. A footnote on Table 3 of the August 9, 2009 Groundwater Monitoring Report indicates that well MW-8 was not sampled during the second quarter of 2009, "because well is not hydraulically connected to unconfined water-bearing zone." ACEH specifically requested that this well be installed to monitor the migration of petroleum hydrocarbons from the source area on the hillside to the water-bearing zones west of Calaveras Road. Well MW-8 is the only monitoring well in a location and installed within the correct vertical interval to monitor the migration of petroleum hydrocarbons from the hillside. Well MW-8 had the highest concentrations of TPH and BTEX of any well at the site during the first quarter 2009 groundwater sampling event. Therefore, we do not understand why sampling was suspended for well MW-8 during the second quarter of 2009. Well MW-8 is to be sampled during each quarterly event. In order to avoid similar data gaps during future sampling events, you are required to submit a sampling schedule that identifies all wells to be sampled during quarterly sampling events for ACEH approval no later than November 17, 2009. The sampling schedule is to be followed during each sampling event without variance.

#### TECHNICAL REPORT REQUEST

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

- **November 17, 2009** – Groundwater Monitoring Report for Third Quarter 2009 with Schedule for Future Groundwater Monitoring
- **February 8, 2010** – Passive Soil Vapor Sampling Report
- **February 15, 2010** – Groundwater Monitoring Report for Fourth Quarter 2009
- **May 15, 2010** – Groundwater Monitoring Report for First Quarter 2010
- **August 15, 2010** – Groundwater Monitoring Report for Second Quarter 2010

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 PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](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.

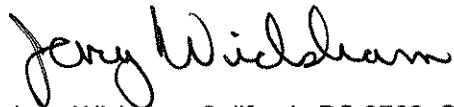
#### AGENCY OVERSIGHT

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.

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If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org).

Sincerely,



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

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Cheryl Dizon, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway  
Livermore, CA 94551

Jeff Johnson, Chevron Pipe Line Company, 4800 Fournace Place, Bellaire, TX 77401-2324

Joe Morgan III, URS Corporation, 1333 Broadway, Suite 800  
Oakland, CA 94612

Jacob Henry, URS Corporation, 1333 Broadway, Suite 800  
Oakland, CA 94612

Joe Naras, San Francisco Public Utilities Commission, Natural Resources Division  
1657 Rollins Road, Burlingame, CA 94010

Craig Freeman, San Francisco Public Utilities Commission, Environmental and Regulatory  
Compliance Division, 1145 Market Street, Suite 500, San Francisco, CA 94103

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
Geotracker, File

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>ISSUE DATE:</b> July 5, 2005
	<b>REVISION DATE:</b> March 27, 2009
	<b>PREVIOUS REVISIONS:</b> December 16, 2005, October 31, 2005
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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](mailto: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](mailto: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.