



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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December 9, 2010

Mr. Jeff Johnson (*Sent via E-mail to: jojw@chevron.com*)
Chevron Pipe Line Company
4800 Fournace Place
Bellaire, TX 77401-2324

Subject: Review of Site Conceptual Model for SLIC Case No. RO0002892 and Geotracker Global ID SL0600100443, Chevron Sunol Pipeline, 2793 Calaveras Road, Sunol, CA 94586

Dear Mr. Johnson:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted report entitled, "*Conceptual Site Model, SLIC Case RO0002892, Chevron Pipeline Company, Sunol Spill, 2793 Calaveras Road, Sunol, CA,*" dated October 28, 2010 (CSM). The CSM was prepared on behalf of Chevron Pipe Line Company by URS Corporation.

On July 23, 2009, Chevron Pipe Line Company made a decision to discontinue soil vapor extraction (SVE) at the site. ACEH did not concur with termination of the remediation since operation of the SVE system continued to remove contaminant mass in the source area. A passive soil vapor survey conducted in 2009 showed higher concentrations of TPH and BTEX at several soil vapor sampling locations on the hillside below the pipeline release. These findings indicate that petroleum hydrocarbons remain in shallow soil on the hillside and provide target areas for continued remediation.

During a meeting held on March 25, 2010 between Mr. Jeff Johnson of Chevron Pipe Line Company, Joe Morgan of URS Corporation, Jacob Henry of URS Corporation, and Jerry Wickham of ACEH, the development of CSM was proposed by Chevron Pipe Line Company and URS. ACEH did not object to the development of a CSM in order to identify potential data gaps prior to resuming site remediation.

Based on our review, the October 28, 2010 CSM generally confirms previous conclusions regarding site conditions. Petroleum hydrocarbons, which act as an ongoing source of groundwater contamination, remain on the hillside in the area of the release. Additional remediation will be required to address the remaining contamination in the source area. The concentrations of petroleum hydrocarbons in groundwater west of Calaveras Road appear to be decreasing due to natural attenuation processes.

We request that you submit a Work Plan to address the data gaps identified in the CSM and the technical comments below.

TECHNICAL COMMENTS

1. **Environmental Screening Levels.** We do not concur with the conclusion in the CSM that site groundwater does not have existing or potential beneficial uses. Groundwater at the site has a future beneficial use as drinking water for municipal and domestic water supplies. The application of Environmental Screening Levels (ESLs; San Francisco Bay Regional Water Quality Control Board 2008) for gross contamination, as discussed in section 4.1.4 of the CSM, is not appropriate for this site.
2. **Water Well Survey Information.** The CSM refers to a water well search conducted in 2009 for a 14-mile section of the pipeline in stating that no water supply wells are within two miles of the site. We are not aware of this information being presented previously. In the Work Plan requested below, please include the referenced well search report or the appropriate section of the report in order for the information to be confirmed.
3. **Well MW-8 and Additional Wells at the Base of Hillside.** Non-aqueous phase liquids appeared in well MW-8 for the first time in September 2010. Graphs of petroleum hydrocarbons in groundwater over time indicate an increasing concentration trend since well MW-8 was installed in 2006. These data indicate that the hillside area above well MW-8 continues to be a source of groundwater contamination. We concur with the conclusion in section 4.3.4 of the CSM that the installation of additional shallow wells is needed along the eastern side of Calaveras Road. Please include these plans in the Work Plan requested below.
4. **Outdated Soil Analytical Data.** The CSM discusses the fact that soil analytical data for the site were collected from 2005 through 2007. Although some reductions in concentrations are expected to have occurred at the site during SVE remediation, the passive soil vapor survey confirms that petroleum hydrocarbons remain in shallow soil on the hillside and provide target areas for continued remediation. SVE operations and increasing concentrations of petroleum hydrocarbons in well MW-8 have also confirmed that petroleum hydrocarbons remain in soil in the source area. Based on the indirect data provided by the passive soil vapor survey, SVE operations, and groundwater data, the fact that the soil data is up to five years old does not appear to be a critical data gap on its own. However, you may propose data collection to address this data gap in conjunction with defining the vertical extent of contamination as discussed in technical comment 5.
5. **Depth of Hillside Source Area Impacts.** The CSM indicates that the depths and concentrations of the remaining impacts in the hillside are not known. We concur that the vertical extent of contamination in the hillside area is a data gap that should be addressed. In particular, evaluating the distribution of the source mass and pathway for contaminants to reach the gravel layer intersected by well MW-8 at the base of the hillside may warrant further efforts. Please include plans in the Work Plan requested below to address this data gap.
6. **Resuming Site Remediation.** Further remediation of the source area will be required for this site. Portions of the hillside source area are difficult to access. Therefore, please consider the potential to install additional SVE wells in planning and conducting a data gap investigation.

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7. **Groundwater Monitoring.** The November 15, 2010 Third Quarter 2010 Groundwater Monitoring Report recommends reducing groundwater sampling from quarterly to semi-annual sampling. We have no objection to future semi-annual groundwater sampling during the first and third quarters. However, future monitoring wells will need to be sampled on a quarterly basis for a one year period.

TECHNICAL REPORT REQUEST

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

- **March 3, 2011** – Work Plan
- **May 17, 2011** – Groundwater Monitoring Report for First Quarter 2011
- **November 15, 2011** – Groundwater Monitoring Report for Third Quarter 2011

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: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Cheryl Dizon (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551
(Sent via E-mail to: cdizon@zone7water.com)

Joe Morgan III, URS Corporation, 1333 Broadway, Suite 800, Oakland, CA 94612 (Sent via E-mail to: joe_morgan@urscorp.com)

Jacob Henry, URS Corporation, 1333 Broadway, Suite 800, Oakland, CA 94612 (Sent via E-mail to: jacob_henry@urscorp.com)

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

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Craig Freeman, San Francisco Public Utilities Commission, Environmental and Regulatory Compliance Division, 1145 Market Street, Suite 500, San Francisco, CA 94103 (*Sent via E-mail to: CFreeman@sfwater.org*)

Donna Drogos, ACEH (*Sent via E-mail to: donna.drogos@acgov.org*)
Jerry Wickham, ACEH (*Sent via E-mail to: jerry.wickham@acgov.org*)

Geotracker, File

Attachment 1
Responsible Party(ies) Legal Requirements/Obligations

REPORT REQUESTS

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/electronic_submittal/report_rqmts.shtml).

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.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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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| Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) | REVISION DATE: July 20, 2010 |
| | ISSUE DATE: July 5, 2005 |
| | PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010 |
| 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

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection.**
- 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)

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
 - 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, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - 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.