



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

September 11, 2014

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

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

Subject: Review of Request for Closure for SLIC Case No. RO0002892 and GeoTracker Global ID SL0600100443, Chevron Sunol Pipeline, 2793 Calaveras Road, Sunol, CA 94586

Dear Mr. Gwin and Mr. Naras:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the most recent document entitled, "*Second Quarter 2014 Groundwater Monitoring Report, SLIC Case #RO0002892, Chevron Sunol Pipeline Site, Sunol, CA,*" dated July 9, 2014 (Monitoring Report). The Monitoring Report, which was prepared on behalf of Chevron Pipe Line Company by URS Corporation, presents a request for case closure that is supplemental to the previous "*Closure Request,*" report dated August 23, 2013 (Closure Request).

In correspondence dated October 30, 2013, ACEH requested that groundwater monitoring wells MW-12 through MW-15 be sampled for two consecutive quarters. ACEH indicated that the site may be reviewed for case closure following sampling of the wells for two quarters and contingent upon the results. However, wells MW-12 through MW-15 have not contained sufficient water to be adequately sampled since installation. Therefore, two quarters of sampling have not been completed for wells MW-12 through MW-15.

The Monitoring Report indicates that based on the results of the First Semiannual 2014 and Second Quarter 2014 groundwater monitoring event as well as the previously submitted Closure Request by URS in August 2013, site conditions meet the general and media-specific criteria for closure under the State Water Resources Control Board Low-Threat Closure Policy (LTCP). Since groundwater cannot currently be collected from monitoring wells MW-12 through MW-15, we have reviewed the case file and request for case closure in the Monitoring Report and Closure Request. The technical comments from our review are shown below.

The LTCP evaluation presented by URS in the Closure Report includes several assumptions regarding future use of groundwater and land use for the property. In order to verify that these assumptions are valid, we request that the current landowner which is the San Francisco Public Utilities Commission (SFPUC), review these statements regarding the current and reasonably expected future use of the site

and site conditions for accuracy. Prior to continuation of the case closure review process, we request that the SFPUC indicate in writing whether these statements, which are discussed in the technical comments below, accurately describe current and reasonably expected future use of the site and site conditions.

TECHNICAL COMMENTS

1. **Application of LTCP for Evaluation of Site.** We concur that although the LTCP does not directly consider other petroleum releases such as pipelines, the criteria for closure evaluation should be similar to those in the LTCP. Therefore, the LTCP can be considered in evaluation of the site for case closure provided that the site-specific conditions for the release are considered. The primary release was a break in the pipeline that sprayed gasoline approximately 50 feet into the area and spilled down slope to the west.
2. **General Criteria – Release Is within Service Area of a Public Water System (Section 4.1.1 of Closure Request).** The site is not within the service area of a public water system and therefore does not meet this general criterion. The Closure Request states that the site is part of the SFPUC watershed, has a Water Management land use designation, and that use of groundwater in the area of the site is unlikely. The site can be considered for case closure if verification is provided that groundwater at the site is not likely to be used in the future. Therefore, we request that the current landowner, which is the San Francisco Public Utilities Commission (SFPUC), review the statements presented in section 4.1.1 of the Closure Request and indicate in writing whether these statements accurately represent the current and reasonably expected future use of the site and site conditions.
3. **General Criteria – Secondary Source Removed to the Extent Practicable (Section 4.1.6 of Closure Request).** A soil vapor extraction (SVE) system operated sporadically at the site from November 2005 until July 23, 2009. On July 23, 2009, Chevron Pipe Line Company made a decision to discontinue 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 indicated that petroleum hydrocarbons remained in shallow soil on the hillside and provided target areas for continued remediation. ACEH requested that SVE be continued after July 2009; however, no additional remediation was implemented. The secondary source was not removed to the extent practicable when SVE was discontinued in July 2009 at the site. However, continuation of remediation or further source removal is not requested at this time pending completion of the case closure review process.
4. **Media-Specific Groundwater Criteria (Section 4.2.1 of Closure Request).** In order to satisfy the media-specific LTCP criteria for groundwater, the plume must be stable or decreasing in areal extent and meet all of the characteristics of one of five classes. Sampling of monitoring wells MW-12 through MW-15 would have provided information on contaminant migration from the hillside area which would help to evaluate plume stability. Since groundwater samples have not been collected from these wells, plume stability has not been fully evaluated. However, groundwater concentrations have generally decreased within the area west of Calaveras Road. Therefore, the plume west of Calaveras Road may be stable or decreasing. The Closure Request indicates that the site meets Class 5 and that under reasonable anticipated near-term future scenarios, water quality objectives

will be achieved within a reasonable time frame. Whether water quality objectives within the area of the site will be achieved within a reasonable time frame depends upon whether future use of groundwater in the area of the site is likely or unlikely. Therefore, as previously requested in technical comment 1, we request that the landowner, SFPUC, provide written indication as to whether groundwater use in the area of the site appears to be unlikely as stated in the Closure Request.

5. **Media-Specific Vapor Criteria (Section 4.2.2 of Closure Request).** We concur that the area west of Calaveras Road appears to meet the media-specific vapor criteria in the LTCP. The hillside area has not been evaluated sufficiently to determine whether the hillside area meets the media-specific vapor criteria in the LTCP. The Closure Request includes a statement that the hillside area is unsuitable for a building. If the site is to be closed without an evaluation of potential vapor intrusion in the hillside area, a site management requirement will be required. The site management requirement will indicate that building construction in the hillside area is not permitted without evaluation of the potential for vapor intrusion.
6. **Media-Specific Direct Contact and Outdoor Air Criteria (Section 4.2.3 of Closure Request).** The Closure Request concludes that the site meets the media-specific direct contact and outdoor air criteria in the LTCP because site concentrations are less than levels that a site-specific risk assessment demonstrates will have no significant risk of adversely affecting human health. However, the information presented in the Closure Request is insufficient to support a risk assessment. Site-specific risk levels are presented in one column of a table with no discussion or supporting information on how the risk levels were generated. This does not meet the requirement for a site-specific risk assessment. A low likelihood of exposure due to limited access and land use is also discussed in the Closure Request. Although the "site-specific risk assessment," is insufficient, the site does meet the media-specific direct contact and outdoor air criteria if a site management requirement is placed upon the hillside area as discussed in technical comment 5. The Monitoring Report indicates that soil samples at the site were not analyzed for naphthalene and PAHs as they are not present in gasoline. It should be noted that naphthalene is a polycyclic aromatic hydrocarbon (PAH) and is a constituent of gasoline.
7. **Last Paragraph on Page 6-1 of the Monitoring Report.** The last paragraph on page 6-1 of the Monitoring Report is not consistent with the conclusions in the remainder of the report and also makes a statement that appears to be unsubstantiated. We will assume that the paragraph contains editorial errors and ignore the content of the paragraph. However, the first sentence of the paragraph references soil vapor data presented in the 2013 Closure Request as supporting a conclusion regarding risk to human health. It should be noted that the soil vapor data in the Closure Request appears to be data from the operations of the soil vapor extraction system. These data do not support a conclusion that vapor at the site does not pose a risk to human health nor is the data acceptable for the purpose of making decisions regarding human health risks.

Responsible Parties
RO0002892
September 11, 2014
Page 4

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Jerry Wickham), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **December 15, 2014** – Correspondence from SFPUC regarding groundwater and land use assumptions made by URS and Chevron Pipe Line in closure request
File to be named: GWM_R_yyyy-mm-dd RO2892

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org. Case files can be reviewed online at the following website: <http://www.acgov.org/aceh/index.htm>.

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: Colleen Winey (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551
(Sent via E-mail to: cwiney@zone7water.com)

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

Joe Naras, San Francisco Public Utilities Commission, Natural Resources Division
(Sent via E-mail to: JNaras@sfwater.org)

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)

Dilan Roe, ACEH (Sent via E-mail to: dilan.roe@acgov.org)
Jerry Wickham, ACEH (Sent via E-mail to: jerry.wickham@acgov.org)

GeoTracker, eFile

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.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 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 deh.loptoxic@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 deh.loptoxic@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.