

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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May 9, 2008

Mr. Ian Robb
Chevron Environmental Management Company
6001 Bollinger Canyon Road
San Ramon, CA 94583-2324

Ms. Chris Davidson
City of Livermore Economic Development
1052 S. Livermore Ave.
Livermore, CA 94550

Subject: Fuel Leak Case No. RO0002908 and Geotracker Global ID T0600196622, Miller Square Park, 2259 First Street, Livermore, CA 94550

Dear Mr. Robb and Ms. Davidson:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above referenced site including the recently submitted document entitled, "*Subsurface Investigation Report and Well Installation Workplan*," dated March 27, 2008, which was prepared on behalf of Chevron by Conestoga-Rovers & Associates. The "*Subsurface Investigation Report and Well Installation Workplan*," presents the results of soil, soil vapor, and grab groundwater sampling. Fuel hydrocarbons were detected at elevated concentrations in soil and groundwater. Based on these results, the "*Subsurface Investigation Report and Well Installation Workplan*," proposes the installation of three monitoring wells and resampling of soil vapor probe VP1 at 5 and 10 feet bgs.

The proposed installation of three monitoring wells and re-sampling of soil vapor probe VP1 is generally acceptable. However, we have several comments on the results of the site investigation and proposed scope of work that require additional evaluation and/or investigation. Therefore, we request that you submit a Work Plan that addresses the technical comments below **no later than July 11, 2008**.

TECHNICAL COMMENTS

- 1. Soil Vapor Sampling.** We concur with the proposal to re-sample soil vapor probe VP1. Based on the unknown contents of the former USTs, we request that you expand the analyte list for the proposed TO-15 analysis to include chlorinated solvents. Please present the results of the re-sampling and analyses in the Work Plan or Site Investigation Report requested below.
- 2. Horizontal Extent of Contamination.** Elevated concentrations of fuel hydrocarbons were detected in groundwater samples collected from the CPT borings in Livermore Avenue. The horizontal extent of groundwater contamination has not been defined. Please present plans to define the horizontal extent of contamination in the Work Plan requested below.

3. **Contamination in Area of SB8.** Soil boring SB8 is located northeast of the former dispenser islands and north of the former USTs. Based on water level data from other sites, the hydraulic gradient in this area of Livermore is to the west to northwest. Therefore, boring SB8 is apparently cross gradient from the suspected sources of fuel releases at the site. However, the concentrations of total petroleum hydrocarbons as gasoline and diesel detected in the grab groundwater sample from SB8 were higher than the concentrations of TPHg and TPHd detected in grab groundwater samples from the other soil borings and cone penetrometer borings advanced in suspected source areas or downgradient from source areas. Please review these data to develop a proposed scope of work to assess whether contamination in the area of boring SB8 is from the suspected sources located in cross gradient directions or whether a contaminant source exists within the area of or upgradient from boring SB8. Please present your analysis and proposed scope of work in the Work Plan requested below.
4. **Vertical Extent of Contamination and CPT Borings.** The cone penetrometer (CPT) borings were stopped at approximately 55 feet bgs rather than the planned 80 feet bgs. The purpose of the CPT borings was to define the vertical extent of contamination. Fuel hydrocarbons were detected at elevated concentrations in the grab groundwater samples collected from first-encountered groundwater in the CPT borings. Based on these results, it is necessary to extend the CPT borings to a depth of 80 feet bgs to define the vertical extent of contamination. Groundwater samples are to be collected from each significant water-bearing zone identified on the CPT log below first encountered groundwater. Please include plans to extend the CPT borings in the Work Plan requested below.
5. **Proposed Well Installation.** We have no objection to the proposed monitoring well locations. However, the proposed well screen interval for the wells is 20 to 45 feet bgs. A review of the CPT logs indicates that a sandy silt & clayey silt layer that separates overlying and underlying coarse-grained soils, is present from approximately 32 to 36 feet bgs. We request that the monitoring wells not be installed within long well screens that may hydraulically connect separate water-bearing layers. Please review the CPT logs and cross sections to propose shorter well screen intervals that target discrete water-bearing zones.
6. **Grab Groundwater Sample from SB6.** The grab groundwater sampling results from soil boring SB6 appear anomalous. Soil boring SB6 was advanced adjacent to boring B3. Boring B3 was advanced by Fugro West, Inc. in September 2003. The grab groundwater sample from SB6 contained TPHg at a concentration of 110 milligrams per kilogram while the grab groundwater sample from Fugro West, Inc. contained TPHg at a concentration of 18,000 mg/kg. The depth to first encountered groundwater in boring SB6 is reported as 22 feet bgs, which is significantly less than the depth to groundwater elsewhere at the site. Furthermore, we are not aware of groundwater being encountered at depths as shallow as 22 feet bgs in this area of Livermore during the January to February 2008 time period. In the Work Plan requested below, please discuss the likely source of shallow groundwater in SB6 and whether the sample is representative. Cross sections of the site are required in order to help in this evaluation.

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7. **Grab Groundwater Results for Boring SB-9.** The text on page 3 indicates that grab groundwater samples were collected from each boring except SB9. The boring log also indicates that groundwater was not encountered in the boring. However, groundwater analytical results for SB9 water are included in Table 4 and are presented in Attachment E – Laboratory Analytical Reports. A chain of custody form for a groundwater sample from boring SB9 is also included in Attachment E. Please review the grab groundwater results for SB9 to assure that grab groundwater results are reported accurately in future reports.

TECHNICAL REPORT REQUEST

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

- **July 11, 2008 – Work Plan**
- **120 days after ACEH approval of Work Plan – 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 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

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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

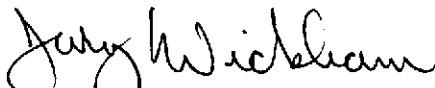
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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.

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

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

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Danielle Stefani
Livermore-Pleasanton Fire Department
3560 Nevada Street
Pleasanton, CA 94566

John Rigter
Livermore-Pleasanton Fire Department
3560 Nevada Street
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Charlotte Evans
Conestoga-Rovers & Associates
5900 Hollis Street, Suite A
Emeryville, CA 94608

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

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

ISSUE DATE: July 5, 2005

REVISION DATE: December 16, 2005

PREVIOUS REVISIONS: October 31, 2005

SECTION: Miscellaneous Administrative Topics & Procedures

SUBJECT: Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, 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 Alicia Lam-Finneke.
- 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 at 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)