



January 31, 2018

Ms. Carryl MacLeod (*Sent via E-mail to: cmacleod@chevron.com*)
Chevron Environmental Management Company
6101 Bollinger Canyon Road
San Ramon, CA 94583

Mr. Eric Uranga (*Sent via E-mail to: ejuranga@cityoflivermore.net*)
City of Livermore Economic Development
1052 S. Livermore Ave.
Livermore, CA 94550

Subject: Fuel Leak Case No. RO0002908 and GeoTracker Global ID T0600196622, Chevron #30-7233/Mills Square Park, 2259 1st Street, Livermore, CA 94550

Dear Ms. MacLeod and Mr. Uranga:

Alameda County Department of Environmental Health (ACDEH) is providing oversight of the investigation and cleanup of the subject site under two regulatory oversight programs. Regulatory oversight for the investigation and cleanup of unauthorized releases of petroleum hydrocarbons associated with former commercial petroleum fueling facilities at the site is being provided under the State Water Resources Control Board Petroleum Underground Storage Tank (UST) Cleanup Program (Fuel Leak Case No. RO0002908). Regulatory oversight of the investigation and cleanup of lead impacted soil is being provided under Alameda County's Voluntary Remedial Action Program (Site Cleanup Program Case No. RO0003255).

Over the last several months, a series of meetings (listed below) have been held with representatives from ACDEH, the City of Livermore, and CEMC to determine a path forward for soil and groundwater remediation at the site in conjunction with the City's planned redevelopment of the site as the Livermorium Plaza.

- November 30, 2018 meeting with ACDEH, the City of Livermore, and CEMC;
- January 10, 2018 meeting with ACDEH and CEMC; and
- January 17, 2018 teleconference call with ACDEH and the City of Livermore.

Based on ACDEH's file review, and conversations held during the above listed meetings, ACDEH requests that you address the Technical Comments provided below, submit the requested reports and conduct the work by the associated compliance dates. The compliance dates have been developed based on a mutually agreed upon schedule that will facilitate coordination of remedial activities with the City's park renovation project.

TECHNICAL COMMENTS

1. Remedial Action Plan (RAP). Please submit a RAP for remediation of petroleum hydrocarbon impacted soil and groundwater that includes the following minimum information:

- Proposed cleanup goals and the basis for cleanup goals;
- Summary of site characterization data including soil vapor sampling data collected to evaluate vapor intrusion risk to the adjacent Peet's Coffee building;
- Receptor information including likely future land use scenarios, adjacent land use and sensitive receptors, and potential groundwater receptors;
- Evaluation of a minimum of three active remedial alternatives including discussion of feasibility, cost effectiveness, estimated time to reach cleanup goals, and limitations for each remedial alternative;
- Detailed description of proposed remediation including confirmation sampling and monitoring during implementation;
- Post-remediation monitoring; and
- Schedule for implementation of cleanup.

The RAP must include at a minimum feasible alternatives for the remediation of petroleum hydrocarbon impacted soil and groundwater beneath the site. A review of soil data indicates a significant mass of petroleum hydrocarbons in soil beneath a large portion of the site. This mass continues to be a source to the groundwater plume and thus requires remediation. Analytical data from the downgradient shallow groundwater monitoring wells MW-8 and MW-10 as well as onsite well MW-7 show total petroleum hydrocarbon as diesel (TPH-d) groundwater concentrations indicative of light non-aqueous phase liquids (LNAPLS). Groundwater TPH-d concentrations in these wells fluctuate between dissolved phase concentrations and concentrations indicative of LNAPL and thus do not exhibit a biodegradation trend. Some of the residual mass is located within soil above 15 feet below ground surface and thus could potentially be excavated during lead remediation and park renovations. Alternatives for remediation of deeper soil contamination must be presented in the RAP.

ACDEH notes that regulatory oversight for the investigation and cleanup of lead impacted soil is being provided under a separate Site Cleanup Program case (RO0003255). As discussed in the above listed meetings, the RAP will include proposed remedial actions for both petroleum hydrocarbon impacted soil and groundwater and lead impacted soil to be conducted during park renovations.

In the event the park redevelopment does not occur, a Remedial Action Plan will still be required to remediate petroleum hydrocarbon and lead impacted soil and petroleum hydrocarbon impacted groundwater to mitigate the risk to human health and the environment under the current site configuration.

Public participation is a requirement for the RAP process, therefore, the RAP must present sufficient detail to inform the community of proposed remedial measures. ACDEH will notify potentially affected members of the public who live or own property in the surrounding area of the proposed remediation described in the RAP. Public comments on the proposed remediation will be accepted for a 30-day period.

2. **Remedial Action Implementation Plan (RAIP)** - Please submit a RAIP as a companion document to the RAP presenting a comprehensive and detailed plan for the selected remedial alternative for remediation of petroleum hydrocarbon impacted soil and groundwater.
3. **Groundwater Monitoring Well Destruction and Installation Work Plan** - Please submit a Groundwater Monitoring Well Destruction and Installation Work Plan. The work plan must identify wells proposed to be destroyed to facilitate park renovations and installation of proposed additional off-site wells to monitor and delineate the offsite groundwater contaminant plume.
4. **Construction Soil and Groundwater Management Plan (Construction SGMP)** – Please submit a Construction SGMP describing procedures to be followed by environmental consultants, construction contractors and workers, and other property owner representatives during property improvements, identifying safety and training requirements for construction workers, establishing procedures for assessing and managing contaminated. We request that you use ACDEH’s Construction SGMP template which will be provided to you electronically.
5. **Soil Import Management Plan (SIMP)** - Please submit a SIMP presenting criteria required to evaluate the environmental conditions of proposed import borrow sites; the environmental sampling and analysis required to characterized the soil to be imported form proposed import borrow sites; proposed site-specific screening levels to be referenced for accepting the soil proposed to be imported; and the documentation to be submitted to ACDEH for timely review and approval of proposed soil to be imported.
6. **Baseline Project Schedule** - Please submit a Baseline Project Schedule incorporating the following stakeholder agreed upon dates:

March 2, 2018	RAP Submittal
March 9, 2018	Start of Public Participation Period
April 11, 2018	Project Status Meeting
April 9, 2018	End of Public Participation Period
April 30, 2018	ACDEH RAP Approval
April 30, 2018	Submittal of RAIP, Construction SGMP, Groundwater Monitoring Well Destruction and Installation Report and SIMP
May 18, 2018	ACDEH Approval of RAIP, Construction SGMP, Groundwater Monitoring Well Destruction and Installation Report, and SIMP
May 30, 2018	Livermorium Plaza Ceremony
June 1, 2018	Start of Remediation

The Baseline Project Schedule must be updated and submitted to ACDEH throughout the project.

TECHNICAL REPORT REQUEST

Please upload technical reports to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **March 2, 2018** – Remedial Action Plan
File to be named: RAP_R_yyyy-mm-dd RO2908_RO3255

- **April 30, 2018** – Remedial Action Implementation Plan
File to be named: WP_R_yyyy-mm-dd RO2908_RO3255
- **April 30, 2018** – Groundwater Monitoring Well Destruction and Installation Work Plan
File to be named: WP_R_yyyy-mm-dd RO2908_RO3255
- **April 30, 2018** – Construction Soil and Groundwater Management Plan
File to be named: RAP_R_yyyy-mm-dd RO2908_RO3255
- **April 30, 2018** – Soil Import Management Plan
File to be named: WP_R_yyyy-mm-dd RO2908_RO3255

If you have any questions, please call me at (510) 567-6767 or send me an electronic mail message at dilan.roe@acgov.org.

Sincerely,



Dilan Roe, PE, C73703
Chief – Land Water Division



Drew J. York
Senior Hazardous Materials Specialist

Enclosure: Attachment 1 – Responsible Party (ies) Legal Requirement/Obligations Instructions
Attachment 2 – Electronic File Naming Conventions

cc: Colleen Winey, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway
Livermore, CA 94551 (Sent via E-mail to: cwiney@zone7water.com)
Cheri Sheets, City of Livermore, (Sent via E-mail to: crsheets@cityoflivermore.net)
Rosy Ehlert, City of Livermore, (Sent via E-mail to: rmehlert@cityoflivermore.net)
Natasha Sihota, CEMC, (Sent via E-mail to: NSihota@chevorn.com)
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Paresh Khatri, ACDEH (Sent via E-mail to: paresh.khatri@acgov.org)
Drew York, ACDEH (Sent via E-mail to: andrew.york@acgov.org)
Dilan Roe, ACDEH (Sent via E-mail to: dilan.roe@acgov.org)
Electronic File, GeoTracker

ATTACHMENT 1

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) 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 licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.

ATTACHMENT 2

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: August 1, 2017
	PREVIOUS REVISIONS: July 17, 2017, November 8, 2016, December 15, 2015, December 16, 2014, June 19, 2013, June 15, 2011, March 26, 2009, April 29, 2008
	ISSUE DATE: June 16, 2006
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: File Names for Electronic Reports

Format: REPORT_NAME_R_YYYY-MM-DD
Ex: SWI_R_VOL1_2006-05-25

LOP and SCP (VRAP) INCOMING REPORTS AND LETTERS	
Document Name	Abbreviation File Name= Abbreviation + Date (yyyy- mm-dd)
Abandoned Well Information/Water Supply Well Information	ABWELLINF_R
Addendum	ADEND_R (added after report name)
Additional Information Report	ADD_R
Analytical Reports (Loose data sheets not in report)	ANALYT_R
As Built Drawings (or Plans)	AS_BUILT
Case File Scanned By OFD	CASE_FILE
Cleanup and Abatement Report	CAO_R
Case Transfer Form (from CUPA)	CASE_TRNSFR_F
Conduit Study/Well Search/Sensitive Receptor/Well Survey/Preferential Pathway Study	COND_WELL_R
Corrective Action Plan (CAP)	CAP_R
Correspondence	CORRES_L
Court Injunctions	INJ_L
Development Plans (Includes Plan Set, Cross-sections, and Related Drawings)	DEV_PLAN_date
Development Schedule (Project Schedule, Gant Chart, etc.)	DEV_SCHD_date
DWR Confidential Well Logs (Report containing)	report name_R_CONFIDENTIAL_YYYY-MM-DD (Ex: SWI_R_CONFIDENTIAL_YYYY-MM-DD)
DWR Well Completion Report-Confidential (Loose well logs)	DWR_WELL_CONFIDENTIAL_YYYY-MM-DD (Date of Well Log)
ESI/DAR (Environmental Site Investigation, Data Assessment Report)	ESI_R
Excavation Report	EX_R
Extension Request Letter	EXT_RQ_L
Fact Sheet	FACT_SHT

Feasibility Study	FEASSTUD_R
Groundwater Monitoring/Quarterly Summary Report	GWM_R
Financial Assurance/Letter of Credit	FNCL_ASSRNC_LOC
Interim Remedial Action Plan	IRAP_R
Interim Remediation Results (Includes Pilot Test Reports, Vapor Mitigation Reports, Soil Reports, Free Product Removal Reports, & Dual-Phase Extraction Reports)	IR_R
Lawsuit	LAWSUIT_R
Migration Control Report	MIG_R
Miscellaneous Report/Soil Sample	MISC_R
Miscellaneous Sample Report (analytical results)	MISC_SAMP_R
Notification Letter	NOT_L
NPDES Miscellaneous Reports	NPDES_R
Operations & Maintenance Plan	OM_P
Operations & Maintenance Report	OM_R
Pay for Performance	PFP_R
Petition	PETITION_R
Phase 1 Environmental Assessment Report	PHASE1_R
Photos	PHOTO_date
Preliminary Site Assessment Report/Phase 2 (historic reports only)	PSA_R
Remedial Action Plan	RAP_R
Remedial Design & Implementation Plan	RDIP_R
Remediation Progress Report	REM_R
Request for Closure	RFC(_L or _R)
Risk Assessment Report	RISK_R
Risk Based Corrective Action	RBCA_R
List of Landowners Forms	LNDOWNR_F_DATE
SB2004 Letter of Commitment	LOC_L
Site Conceptual Model/Conceptual Site Model	SCM_R
Site Health & Safety Plan	SFTY_PLAN_R
Site Management	SITE_MANAGE_R_
Site Management Plan	SMP_R
Site Summary Report	SITE_SUM_R

Soil and Water Investigation Report (Includes soil gas/vapor reports, indoor, additional site investigation, well installation, site characterization, cross section, indoor air, additional onsite investigation, Phase II/preliminary site assessment)	SWI_R
Soil Disposal Report	SOIL_DSPL_R
Source Area Characterization	SOURCAREA_R
State Information	STATE_INFO (no date)
Status Report(monthly remediation status reports addressed to sanitary district requires no stamp/perjury)	STAT_R
Tank/Tank System Removal Report	TNK_R
Tentative Order Report	TENT_R
Unauthorized Release Form	URF_R
UST Sampling Report	UST_SAMP_R
USTCF 5 Year Review	USTCF_5YR
USTCF issued Public Notice	USTCF_PP_L
Well Construction Report (limited to water supply wells)	WELL_CST_R
Well Decommissioning Report/Letter (well destruction/abandonment)	WELL_DCM_R
Work Plan	WP_R

**LOP and SLIC
ACEH OUTGOING LETTERS AND CASE FILE DOCUMENTATION**

Document Name	Abbreviation File Name= Abbreviation + Date (yyyy-mm-dd)
90 Day Letter	90D_L
CAP Approval	CAP_AP_L
RP Certification of Public Notice	CAP_CERT_L
CAP Public Participation Letter	CAP_PP_L
CAP Public Participation Letter to RP	CAP_PPRP_L
Certified Mail Receipt	CERT_MAIL_RECEIPT
Cleanup and Abatement Order	CAO_L
Closure Public Participation Letter	CL_PP_L
Closure Package (Letter, RACC, Summary, Deed Restriction)	CLOS_L
Correspondence	CORRES_L
Deed Restriction	DEED_L_ (Copied from CLOS_L_)
Directive Letter containing Public Notice and/or Landowner request form	DIR_PP_L
Directive Letter (Landowner form, site management requirements, well decommission scheduling prior to closure of PP, copy of PP to all RPs)	DIR_L
Enforcement	ENF_L
Enforcement Referral Letter	ENF_REF_L
Extension Approval Letter	EXT_AP_L
Extension Denial Letter	EXT_DNY_L
Fund Requests	FUND_REQ_L
Final Voluntary Remedial Action Agreement	FVRAA_date
GeoTracker info	GEOTRACK_R
Late Letter	LATE_L
List of Landowners Forms	LNDOWNR_F_DATE
Mailing List for Public Notice in Excel Format	MAIL_PP_DATE
Maps & Assessor's Parcel Information	MAPS_ASSESSOR (no date)
Meeting Agenda, Minutes, Sign in Sheet	MEETING
Miscellaneous Letter	MISC_L
New Landowner Letters	LNDOWNR_REQ_L
Notice of Responsibility	NOR_L
Notice of Violation	NOV_L
Phone Log	PHONE_LOG
Photos	PHOTO_date
Post Closure Monitoring	PCMP_L
QA/QC Checklist (confidential)	QAC_report name_date
Responsible Parties Information	RPINFO_L_DATE OF THE LETTERHEAD
Returned Mail	RTN_MAIL_date

Site Visit/Inspection Report	SITEVISIT_R
Transfer Letter	TRANS_L
UST Permit	UST_PRMT
Voluntary Remedial Action Notice to State Agencies	VRA_NOTICE
Voluntary Remedial Action Request Form from RP	VREQ_F