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June 17, 2015

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Unocal Corp.
c/o: Tim Howard
6001 Bollinger Canyon Rd
San Ramon, CA 94583

Kayo Oil Company
c/o: Real Estate Admin.
315 S. Johnstone # 810G
Bartlesville, OK 74004-0001

Unocal Env. Eng. Dept.
c/o: Compliance Analyst
Address Unknown

Subject: Revised Remedial Design Implementation Plan Report Review for Fuel Leak Case No. RO0000219 and GeoTracker Global ID T0600101476, UNOCAL #5043, 449 Hegenberger Road, Oakland, CA 94621

Dear Responsible Parties:

Thank you for the opportunity to discuss the proposed remedial action during the on-site meeting held on June 9, 2015. Attendees of the meeting included Messrs. Dennis Dettloff, Jan Wagoner and Ed Weyrens of Antea Group USA, Inc. (Antea), Mr. Paul Paradiso of Paradiso Mechanical, and myself. As part of the meeting preparation, Alameda County Environmental Health (ACEH) reviewed the case file, including the recently submitted document entitled *Revised Remedial Design and Implementation Plan* (RDIP), dated May 13, 2015, prepared by Antea for the subject site.

The RDIP proposes changes to an earlier RDIP version, also entitled *Revised Remedial Design and Implementation Plan*, dated October 29, 2014, prepared by Antea. The October 29, 2015 RDIP proposed to excavate two areas, designated A1 and A2, which contain elevated concentrations of petroleum hydrocarbon constituents. Prior to the start of excavation, a State of California licensed C-10 electrical contractor would perform disconnection and removal of electrical lines located within 10 feet of and through the proposed excavation areas. Additionally, Antea determined that the best method for excavation would be to utilize slot trenching techniques and backfilling with controlled density fill (CDF), as the use of CDF along with slot trenching would eliminate the need for shoring in the excavation areas.

Additionally, in order to accelerate biodegradation of the residual dissolved hydrocarbon plume, Regenesis brand Oxygen Release Compound (ORC) Advanced® (ORC-A®) was proposed to be added to the excavation backfill. ORC-A®, which comes in pellet form, would be applied to the bottom of each excavation prior to backfilling.

Though no changes are proposed for excavation A1, the most recent RDIP proposes to excavate area A2 as two separate excavations, separated by an electrical utility line that powers the existing 76 Station. The electrical connection servicing the station building will be de-energized and the utility line daylighted throughout the excavation. Shoring will be installed a minimum of 2 feet from either side of the utility, and once the shoring is in place, the line will be re-energized to continue operation of the station building.

The most recent RDIP also proposes that excavation area A2 be backfilled with 1.5-inch drain rock from the total depth of the excavation to 2 feet bgs. A geo-fabric will be placed over the drain rock to add stability and allow 1.5 feet of base rock to be placed and compacted over the drain rock. Asphalt will be installed over the base rock to match pre-excavation construction. There were no proposed changes to the ORC-A® application for excavation A2.

Prior to the start of the June 9, 2015 field meeting, Pacific Gas and Electric Company (PG&E) was tasked to identify and delineate subsurface utilities in the areas of the proposed excavation. In addition to the known electrical connection servicing the station building, PG&E identified a "primary" electrical line coming on site from Hegenberger Road and crossing the eastern portion of the proposed A2 excavation. The presence of the primary line and the electrical connection line servicing the station building cut the excavation area A2 into three sub-areas.

After a brief review of the data in the field, Antea expressed the opinion the soil in the southeast quadrant of the modified A2 excavation may not need be excavated. ACEH requested a site map depicting the proposed modifications to excavation area A2 based on the locations of the electrical lines passing through the excavation. The figure should show the location of the utility lines, the soil left in place to protect the lines, and data boxes displaying a summary of the laboratory analysis report for borings in the vicinity of A2. The figure was provided to ACEH in an email attachment on June 11, 2015.

As discussed at the meeting, should excavation of area A2 be performed without rerouting the electrical lines, a significant quantity of contaminated soil would remain in-place, limiting the effectiveness of the corrective action. If the lines are not rerouted, additional remedial action is required. The possibility of emplacing a curtain of an ORC along the sidewalls of the soil left in place was presented as a potential remedial option to the electric line rerouting. The ORC curtains were not discussed further pending Antea's consultation with Regenesis.

The scope of work presented in the RDIP has not been adequately justified and cannot be approved at this time. ACEH requests that you address the following technical comments and send us a Revised RDIP Report as requested below.

Technical Comments

1. Excavation A1 Sidewalls – As stated in the RDIP, ORC-A®, which comes in pellet form, will be applied to the bottom of each excavation prior to backfilling.

As discussed at the field meeting, ACEH requests the evaluation of the concept of sleeves filled with ORC-A[®] compound be placed along the fill/native soil sidewalls of each excavation area to aid in the vertical distribution of the oxygen release compound. As the excavation is backfilled, the sleeves can be raised in a tremie fashion leaving behind the ORC-A[®] compound in a vertical distribution in the sidewalls. Another option which may be explored is the placement of ORC-A[®] pellets into a porous sleeve of biodegradable fabric, such as burlap, that can be anchored at the surface and left in place during the backfill operation. Placement of ORC along the sidewalls was not discussed further pending Antea's consultation with Regenesis.

2. Excavation A2 Areal Extent – The figure provided to ACEH on June 11, 2015 reduces the excavation perimeter in the southwest portion of A2. As drawn, the proposed excavation extends up to, but not beyond, the location of monitoring well MW-14. Groundwater most recently recovered from MW-14 was reported to contain 2,990 micrograms per liter ($\mu\text{g/L}$) total petroleum hydrocarbons as gasoline (TPHg) in groundwater and soil bore SB-4 was reported to contain up to 4,600 milligrams per kilogram (mg/kg) TPHg in soil. Groundwater in MW-14 is generally and approximately 4 to 6 feet below the ground surface (bgs) and has been as shallow as 2.88 feet bgs, thus there is no bioattenuation zone beneath the site. ACEH requests the excavation in this area extend beyond the MW-14 location, as depicted on Figure 3 in the October 29, 2014 RDIP.

Additionally, the southeast portion of the excavation is depicted as an "optional excavation area". Although briefly discussed at the field meeting, a review of the data in this area, characterized by soil bore SB-6 containing 1,900 mg/kg TPHg, indicates residual source remains in this area and should be excavated.

3. Excavation A2 Sidewall Curtains – As discussed at the field meeting, should excavation of area A2 be performed without rerouting the electrical lines, a substantial quantity of contaminated soil would remain in-place, limiting the effectiveness of the corrective action. If the lines are not rerouted, the possibility of emplacing a curtain of an ORC along the sidewalls of the soil left in place was presented as a remedial option to the electric line rerouting. The ORC curtains were not discussed further pending Antea's consultation with Regenesis.
4. Excavation A2 Backfill – As stated in the current (May 13, 2015) RDIP, excavation A2 is proposed to be backfill with 1.5-inch drain rock from the total depth of the excavation to 2 feet bgs. ACEH is of the opinion the use of drain rock in this fashion will create a highly permeable zone. This may cause groundwater to accumulate in an excavation bathtub and may result in radial flow during fluctuations of the groundwater level.

ACEH requests intermittent layers of ORC-A[®] be placed during drain rock placement to provide a more uniform distribution of ORC in the subsurface, in addition to the ORC-A[®] compound placed at the base of the excavation, as outlined in the RDIP.

5. Application of Oxygen Release Compound Advanced[®] (ORC-A[®]) – Regenesis, the ORC-A[®] manufacturer, recommends using between 1% and 0.1% ORC-A[®] application by weight. However, the RDIP proposes to use 1/3 of 0.1% (or 0.0333%) – less than the lowest dosage recommended by the manufacturer.

Lacking a sound technical justification for such a low dose, ACEH cannot approve this dose rate. It appears appropriate to dose at one of the manufacturers recommended rates.

Technical Report Request

Please upload technical reports to the ACEH ftp site (Attention: Keith Nowell), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and by the schedule outlined below:

- **July 24, 2015- Revised Remedial Design Implementation Plan** (file name: RO0000219_RDIP_R_YYYY-mm-dd)

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.

If your email address does not appear on the cover page of this notification ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Thank you for your cooperation. If you have any questions or concerns regarding this correspondence or your case, please call me at (510) 567-6764 or send me an electronic mail message at keith.nowell@acgov.org.

Sincerely,

Keith Nowell, P.G., C.H.G.
Hazardous Materials Specialist

Enclosure: Attachment 1- Responsible Party(ies) Legal Requirements/Obligations
ACEH Electronic Report Upload (ftp) Instructions

cc: Dennis Dettloff, Antea Group, 11050 White Rock Road, Suite 110, Rancho Cordova, CA 95670
(Sent via E-mail to: dennis.dettloff@anteagroup.com)

Dilan Roe (Sent via E-mail to: dilan.roe@acgov.org)
Keith Nowell, ACEH (Sent via E-mail to: keith.nowell@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.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.