



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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November 5, 2014

Jillian Holloway
Chevron Environmental Management Company
6101 Bollinger Canyon Road
San Ramon, CA 94583
(Sent via email to: JillianHolloway@chevron.com)

Abdi Fugfugosh and Shukri Noor
5171 Stone Canyon Drive
Castro Valley, CA 94552-5525

Ed Ralston
ConocoPhillips
76 Broadway
Sacramento, CA 95818
(Sent via email to: Ed.C.Ralston@p66.com)

Subject: Fuel Leak Case No. RO0000352 and Geotracker Global ID T0600101453, UNOCAL #5484, 18950 Lake Chabot Rd., Castro Valley, CA 94546

Dear Ms. Holloway and Ms. Noor and Messrs. Fugfugosh and Ralston:

Thank you for the recently submitted documents entitled *Focused Site Conceptual Model (SCM)*, dated September 12, 2014, and *Case Closure Summary (CCS)*, dated October 10, 2014, both documents having been prepared by AECOM for the subject site (Site). Alameda County Environmental Health (ACEH) has reviewed the case file, including the recently submitted documents, and is of the opinion that this case may be closable; however, it is the opinion of ACEH that one data gap remains. The CCS indicates that the nearest surface water body is the Almond Reservoir located 3,080 feet west of the Site. However, the SCM depicts what is described as "Creeks, Buried or Drained" and notes that drained or buried sections of Chabot Creek are to the east and west of the site within 1,000 feet. Drained or buried sections of Chabot Creek are not further defined in the SCM. ACEH notes that data presented in the *Creek and Watershed Map of Hayward and San Leandro (Watershed map)*, dated 1997 and prepared by the San Francisco Estuary Institute, depicts an open channel segment of Chabot Creek, or an un-named tributary (Chabot Creek), west of the Site, having a similar shape south of that portrayed in Figure 1 of the SCM. The Watershed map shows the creek trending south-southeasterly and appears to enter a culvert to the southwest of the Site. Based on the map, the open channel is down gradient of and approaches to within 200 feet of the Site. It is unclear to ACEH if the Chabot Creek depicted on Figure 1 of the SCM and that on the Watershed map are the same creek, and if so, if the creek occupies an open channel or is within a culvert.

As groundwater beneath the Site has been reported as shallow as 2.99 feet below the ground surface (bgs), ACEH is of the opinion that it is likely groundwater would intercept an unlined Chabot Creek channel if the creek is determined to be within 200 feet. It remains unanswered that if the creek channel is "drained", where the drained water goes, and what happens to the groundwater infiltrating the drained channel.

The most recent groundwater monitoring event, conducted on March 8, 2013, reported concentrations of total petroleum hydrocarbons as gasoline (TPHg), tertiary butyl alcohol (TBA) and 2-methylnaphthalene at 1,900

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micrograms per liter (mg/L), 480 mg/L, and 25 mg/L, respectively, in the down gradient monitoring well MW-7. These concentrations are at least an order of magnitude above the Environmental Screening Levels (ESLs) protective of surface water-fresh water aquatic habitats (ESL Table F-2a) of 100 mg/L TPHg, 12 mg/L TBA, and 2.1 mg/L 2-methylnaphthalene. Additionally, concentrations of benzene, naphthalene, and methyl tertiary butyl ether (MTBE) were also reported to exceed ESLs protective of surface water-fresh water aquatic habitats.

The third paragraph of the Sensitive Receptors section of the SCM states the closest section of Chabot Creek is over one-mile to the south. The paragraph continues, stating there are drained or buried sections of Chabot Creek to the east and west within 1,000 feet of the Site. The first sentence appears to contradict the second. ACEH is aware that the Alameda County Flood Control and Water Conservation District (ACFC&WD) has restored sections of Chabot Creek down gradient of the Site to provide natural habitat. To date, the creek restoration project for the bioengineered naturalized stream channel has included removal of concrete channel and underground culvert sections. It is the opinion of ACEH that the one remaining data gap for the subject fuel leak case is the location and status of the creek, including determining if there has been, or if there are plans for, stream-naturalization projects along the portion of the creek in the vicinity of the Site.

Therefore, at this junction, please evaluate the existence of an open channel for Chabot Creek, or an unnamed tributary, west of the Site. If it is found to exist, determine whether or not it occupies a concrete lined trench. If the creek has been diverted, explain the state of the remnant channel, and whether the former channel is a wetland created by intercepting groundwater. Please evaluate or investigate the potential for residual contamination down gradient of MW-7 to impact an open body of water, should the creek be unlined. Additionally, ACFC&WD should be contacted regarding the Chabot Creek restoration project to determine if there has been, or if there are plans for, stream-naturalization projects along the portion of the creek in the vicinity of the Site and present your findings in the report requested below.

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 schedule:

- **January 6, 2015 – Chabot Creek Findings Report** (file name: RO0000352_CORRES_R_yyyy-mm-dd)

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. ACEH looks forward to working with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Sincerely,

Keith Nowell, P.G., Ch.G.
Hazardous Materials Specialist

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

cc: Alexis Fischer, Chevron Environmental Management Company, 6101 Bollinger Canyon Road, San
Ramon, CA 94583 (Sent via email to: JillianHolloway@chevron.com)

Jim Harms, AECOM, 2020 L Street, Suite 400, Sacramento, CA 95811, (Sent via email to:
jim.harms@aecom.com)

Dilan Roe, ACEH
Keith Nowell, ACEH
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.