Nowell, Keith, Env. Health

To: TimBishop@chevron.com
Cc: Katherine.Brandt@arcadis-us.com; AFischer@Chevron.com; Roe, Dilan, Env. Health
Subject: Fuel Leak Case RO366 Unocal #3292, 15008 E 14th St., San Leandro

Dear Mr. Bishop,

Thank you, Katherine Brandt of ARCADIS U.S. Inc. (ARCADIS), and Alexis Fischer of Chevron Environmental Management Company (Chevron) for participating in the meeting on January 21, 2014 regarding fuel leak case for Unocal #3292, 15008 E 14th St., San Leandro, Alameda County Environmental Health (ACEH) case number RO0000366. The purpose of the meeting was to discuss the status of the case and identify action items for moving the case forward toward closure. ACEH acknowledged the case may be closeable under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) but expressed concerns regarding the lack of information for nearby beneficial use wells, for contaminant plume length, and for distance of the plume to surface waters. Therefore at this juncture, please address the following technical comments and submit the requested documents by the dates specified below:

Technical Comments

- Beneficial Use Wells – ACEH presented a figure taken from the nearby down gradient former Chevron station #9-2013 case file (ACEH case file RO950) located at 15002 Hesperian Boulevard in San Leandro. The figure was copied from the well survey for the former Chevron site and depicts nearby supply wells down gradient of Unocal #3292. These wells were not identified in the June 29, 2007 sensitive receptor survey conducted for the subject site.

- Contaminant Plume Length –- The LTCP Media-Specific Criteria for Groundwater includes criteria for plume length that exceeds Water Quality Objectives (WQOs), for distance from the leading edge of the plume to the nearest supply well, and for distance from the leading edge of the plume to the nearest surface water body. ACEH noted the farthest down gradient monitoring well, MW-2(SP), most recently (December 3, 2012) contained 73 micrograms per liter (μg/L) total petroleum hydrocarbons as gasoline (TPHg) and exhibits periodic TPHg concentrations over 100 μg/L. It is also unclear to ACEH that the plume has been defined to the southeast of the site.

- Distance to Surface Water –- It is unclear to ACEH how the distance to the nearest surface water body can be determined if the contaminant plume is not adequately define.

At the meeting conclusion ACEH requested that the technical comments be addressed and the findings presented in a focused site conceptual model to include an updated sensitive receptor survey addressing the nearby wells, evaluation of the adequacy of the monitoring well network to define the plume length, and a discussion of the distance to the nearest surface water body based on the plume length evaluation.

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:

- **March 31, 2014 – Focused Site Conceptual Model** (file name: RO0000366_SCM_R_yyyy-mm-dd)

Thank you for your cooperation. ACEH looks forward to working with you and your consultant 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.

Respectfully,

Keith Nowell

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PDF copies of case files can be reviewed/downloaded at:

http://www.acgov.org/aceh/lop/ust.htm