



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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June 10, 2013

Roya Kambin
Chevron Environmental Management Company
6101 Bollinger Canyon Road
San Ramon, CA 94583
(Sent via E-mail to: RKambin@Chevron.com)

Eric Hetrick
ConocoPhillips
76 Broadway
Sacramento, CA 95818
(Sent via E-mail to: eric.g.hetrick@conocophillips.com)

Rajan Goswamy
4276 MacArthur Boulevard
Oakland, CA 94619
(Sent via E-mail to: rajgoswamy@sbcglobal.net)

Carole Quick and Lorraine Mudgett
10214 SW Stuart Court
Portland, OR 97224-4304

Subject: Case File Review for Fuel Leak Case No. RO0000409 and GeoTracker Global ID T0600102279, Unocal #1156, 4276 MacArthur Boulevard, Oakland, CA 94619

Dear Ms. Kambin, Mr. Hetrick, Ms. Quick, Ms. Mudgett, and Mr. Goswamy:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site, including the documents entitled, "*Report on Limited Site Assessment, 76 Service Station No. 1156, 4276 MacArthur Blvd., Oakland, CA,*" dated April 23, 2013 and "*Report on Vapor Intrusion Investigation, 76 Service Station No. 1156, 4276 MacArthur Blvd., Oakland, CA,*" dated May 21, 2013. The Report on Limited Site Assessment presents results from installation of six monitoring wells and investigation of an unknown vault. The Vapor Intrusion Investigation Report presents results from installation of two vapor probes off-site adjacent to the Oakland Veterinary Hospital and sampling of five existing on-site vapor probes. However, only one of the new vapor probes (SV-2) was sampled. Soil vapor probe SV-1 could not be sampled due to water in the tubing.

We request that you address the technical comments below, perform the proposed work, and send us the reports requested below.

TECHNICAL COMMENTS ON LIMITED SITE ASSESSMENT REPORT

- 1. Unknown Vault.** The Limited Site Assessment Report concludes that the unknown vault is a sewer cleanout and not a source of petroleum hydrocarbons. Based on the results presented, no further investigation of the unknown vault is requested at this time.
- 2. Recommendations.** The Limited Site Assessment Report indicates that sampling results for the newly installed monitoring wells and recommendations for future actions will be included in the next semiannual groundwater monitoring report. We concur that future actions should evaluate groundwater sampling results from the six newly installed groundwater monitoring wells. Please present recommendations for future action in the semiannual groundwater monitoring report requested no later than October 30, 2013. Please also include a summary table of well construction information for all monitoring wells at the site.

TECHNICAL COMMENTS ON VAPOR INTRUSION INVESTIGATION REPORT

3. **Probe SV-1.** A soil vapor sample could not be collected from soil vapor probe SV-1 due to water in the tubing. We request that you attempt to re-sample SV-1. If a vapor sample cannot be collected from SV-1, we request that you install a new vapor probe using the protocol previously established in the, "*Revised Work Plan for Vapor Intrusion Investigation and Risk Assessment, 76 Service Station No. 1156, 4276 MacArthur Blvd., Oakland, CA,*" dated August 27, 2013. Please present soil vapor sampling results in the Vapor Intrusion Investigation Report requested below.
4. **Results from Probe SV-2.** Soil vapor from probe SV-2 contained 6,600,000 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) of total petroleum hydrocarbons as gasoline and 4,900 $\mu\text{g}/\text{m}^3$ of benzene. The concentration of benzene in the soil vapor sample from probe SV-2 exceeds the commercial/industrial Environmental Screening Level by more than an order of magnitude. Further investigation of the potential for off-site vapor intrusion is required. We request that vapor probe SV-2 be re-sampled along with soil vapor probe SV-1. Please present the results from the re-sampling of probes SV-1 and SV-2 along with recommendations for future actions in the Vapor Intrusion Investigation Report requested below.
5. **Recommendations.** The Vapor Intrusion Investigation Report recommends using a vapor intrusion model and spreadsheets to estimate risk for current commercial users and potential future residential exposure. Benzene concentrations in soil vapor on site are up to 1,400,000 $\mu\text{g}/\text{m}^3$ and exceed screening levels by several orders of magnitude. Most of the on-site probes are located along the northwestern boundary of the site to evaluate potential off-site vapor intrusion. The usefulness of using existing data to refine on-site risk estimates is not clear. Please focus future efforts on evaluating the potential for off-site vapor intrusion. ACEH is requesting that the potential for vapor intrusion to the off-site Oakland Veterinary Hospital be evaluated using the step by step approach in the California Department of Toxic Substances Control guidance document entitled, "*Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air,*" dated October 2011. ACEH is not requesting further evaluation of the potential for vapor intrusion on-site at the active commercial service station.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Jerry Wickham), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **September 25, 2013** – Vapor Intrusion Investigation Report
File to be named: SWI_R_YYYY-mm-dd RO409
- **October 30, 2013** – Semi-Annual Groundwater Monitoring Report (to include an evaluation of results and recommendations for future actions)
File to be named: GWM_R_YYYY-mm-dd RO409

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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 you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org. Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. 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.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Attachment: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 2032 (*Sent via E-mail to: lgriffin@oaklandnet.com*)

Brenda Evans, AECOM, 1220 Avenida Acaso, Camarillo, CA 93012 (*Sent via E-mail to: brenda.evans@aecom.com*)

Denis Brown, Shell Oil Products US, 20945 S. Wilmington Ave., Carson, CA 90810-1039 (*Sent via E-mail to: denis.l.brown@shell.com*)

Peter Schaefer, Conestoga-Rovers & Associates, 5900 Hollis Street, Suite A
Emeryville, CA 94608 (*Sent via E-mail to: pschaefer@croworld.com*)

Donna Drogos, ACEH (*Sent via E-mail to: donna.drogos@acgov.org*)

Jerry Wickham, ACEH (*Sent via E-mail to: jerry.wickham@acgov.org*)

GeoTracker, e-File

Attachment 1

Responsible Party(ies) Legal Requirements/Obligations

REPORT/DATA REQUESTS

These reports/data are being requested pursuant to Division 7 of the California Water Code (Water Quality), Chapter 6.7 of Division 20 of the California Health and Safety Code (Underground Storage of Hazardous Substances), and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations (Underground Storage Tank Regulations).

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (Local Oversight Program [LOP] for unauthorized releases from petroleum Underground Storage Tanks [USTs], and Site Cleanup Program [SCP] for unauthorized releases of non-petroleum hazardous substances) require submission of reports in electronic format pursuant to Chapter 3 of Division 7, Sections 13195 and 13197.5 of the California Water Code, and Chapter 30, Articles 1 and 2, Sections 3890 to 3895 of Division 3 of Title 23 of the California Code of Regulations (23 CCR). Instructions for submission of electronic documents to the ACEH FTP site are provided on the attached "Electronic Report Upload Instructions."

Submission of reports to the ACEH FTP site is in addition to requirements for electronic submittal of information (ESI) to the State Water Resources Control Board's (SWRCB) Geotracker website. In April 2001, the SWRCB adopted 23 CCR, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1 (Electronic Submission of Laboratory Data for UST Reports). Article 12 required electronic submittal of analytical laboratory data submitted in a report to a regulatory agency (effective September 1, 2001), and surveyed locations (latitude, longitude and elevation) of groundwater monitoring wells (effective January 1, 2002) in Electronic Deliverable Format (EDF) to Geotracker. Article 12 was subsequently repealed in 2004 and replaced with Article 30 (Electronic Submittal of Information) which expanded the ESI requirements to include electronic submittal of any report or data required by a regulatory agency from a cleanup site. The expanded ESI submittal requirements for petroleum UST sites subject to the requirements of 23 CCR, Division, 3, Chapter 16, Article 11, became effective December 16, 2004. All other electronic submittals required pursuant to Chapter 30 became effective January 1, 2005. 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, 7835, 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, late 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 SCP)	REVISION DATE: July 25, 2012
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (petroleum UST and SCP) 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 .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 <://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 .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.