



ENVIRONMENTAL HEALTH DEPARTMENT
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

August 26, 2011

Roya Kambin (*Sent via email to: RKLG@Chevron.com*)
Chevron Corporation
6001 Bollinger Canyon Road
San Ramon, CA 94583

Bill Borgh (*Sent via email to: Bill.Borgh@conocophillips.com*)
ConocoPhillips
76 Broadway
Sacramento, CA 95818

Sam and Michele Koka (*Sent via email to: skauto@alamedanet.net and mjkoka@alamedanet.net*)
802 Pacific Avenue
Alameda, CA 94501

Subject: Remedial Design and Implementation Plan Approval for Fuel Leak Case No. RO0000450 and Geotracker Global ID T0600102263, Unocal #0843, 1629 Webster St., Alameda, CA 94501

Dear Ms. Kambin, Mr. Borgh and Mr. and Mrs. Koka:

Thank you for the recently submitted documents entitled, *Revised Remedial Action Plan Contingency Plan* dated June 30, 2011 which was prepared by Arcadis to augment the previously approved CAP for the subject site. Alameda County Environmental Health (ACEH) staff has reviewed the case file including the above-mentioned report for the above-referenced site. Arcadis revised the CAP when Chevron became a responsible party for the site and are recommending bio-sparging for two quarters due to the generation of hexavalent chromium [Cr(VI)]. Ozone will be introduced in a phased in approach if biosparge proves ineffective in site cleanup and if Cr(VI) generation can be minimized.

ACEH generally concurs with the proposed scope of work and requests that you address the following technical comments, perform the proposed work, and send us the technical reports described below.

TECHNICAL COMMENTS

1. **Hexavalent Chromium Monitoring** – The performance monitoring chart proposes variable sampling frequency for Cr(VI) based on increases of 3 to 4 mg/L dissolved oxygen (DO), yet increases in Cr(VI) were observed in well MW-10 with less than 3 to 4 mg/L DO. Rather than waiting for an increase of 3 to 4 mg/L increase in DO, begin a minimum of monthly monitoring of Cr(VI) when implementing any ozone sparge. Reduction in Cr(VI) monitoring can occur to quarterly if no increase in Cr(VI) is observed but the frequency cannot be decreased to below quarterly while ozone injection or verification monitoring is ongoing. Ensure that the contingency plan is closely followed and that injection is turned off if Cr(VI) is generated at levels above the ESL.
2. **Pilot Test Implementation** – Please implement the proposed biosparge system as an interim remediation pilot test for two quarters and evaluate the biosparge pilot in the Interim Remediation Pilot Study Report requested below.
3. **Well Installation** – Due to the variations in the grain size of the sand at the site and the presence of silty and clayey sands, ACEH prefers that a Number 2/12 sand is placed in the annular space beside the screened interval.
4. **Public Participation** – Public participation is a requirement prior to adoption of a corrective action plan or if any significant changes to an approved CAP are made. In order to notify potentially affected members of the public of the changes in the CAP, we request that you prepare and distribute an updated fact sheet, if biosparge is to be implemented as the sole corrective action for the site. Before distribution, please send a copy to the caseworker for review. After ACEH approves the fact sheet for distribution, send the Following distribution by U.S. Mail to the attached mailing list, please submit written verification of the date that the Public Notification of Potential Closure of Fuel Leak Case was distributed. Following the public comment period, the comments received must be addressed.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Barbara Jakub), according to the following schedule:

- **September 15, 2011**– Quarterly Monitoring Report (3rd Quarter 2011)
- **December 15, 2011**– Quarterly Monitoring and Remediation Progress/Pilot Test Report (4th Quarter 2011)
- **March 15, 2012**– Quarterly Monitoring and Remediation Progress Report (1st Quarter 2012)
- **June 15, 2012**– Quarterly Monitoring and Interim Remediation Pilot Study Results Report (2nd Quarter 2012)
- **July 15, 2012**– Draft Fact Sheet, if needed

Ms. Kambin, Mr. Borgh and Mr. and Mrs. Koka
RO0000450
August 26, 2011, Page 3

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 639-1287 or send me an electronic mail message at barbara.jakub@acgov.org.

Sincerely,

Barbara J. Jakub, P.G.
Hazardous Materials Specialist

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

cc: Katherine Brant, Arcadis US, Inc. 2000 Powell Street, 7th Floor, Emeryville, CA 94608
(*Sent via E-mail to:* Katherine.Brandt@arcadis-us.com)
Donna Drogos, ACEH (*Sent via E-mail to:* donna.drogos@acgov.org)
Barbara Jakub, ACEH (*Sent via E-mail to:* barbara.jakub@acgov.org)
GeoTracker, e-file

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: July 20, 2010
	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 (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.
 - 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.