

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**  
AGENCY  
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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October 16, 2008

Mr. Rob Speer  
Chevron Environmental Management  
6001 Bollinger Canyon Rd K2256  
PO Box 6012  
San Ramon, CA 94583-2324

Mr. Scott Bohannon  
Bohannon Organization  
60 31<sup>st</sup> Avenue  
San Mateo, CA 94403

Subject: Fuel Leak Case No. RO0000007 (Global ID # T0600100302), Chevron #9-0504, 15900 Hesperian Blvd., San Lorenzo, CA 9458

Dear Mr. Rob Speer and Mr. Scott Bohannon:

Alameda County Environmental Health (ACEH) staff have reviewed the case file for the above referenced site and the document entitled "Site Conceptual Model and Closure Request," received September 14, 2007 and prepared by Conestoga Rovers Associates (CRA). Based on our review of the case file, ACEH noted that during monitoring well installation in 1983 soil samples were not collected from source area wells C-1 through C-5. Furthermore, high levels of dissolved phase contamination were detected in well C-2 at concentrations of up to 1,200,000 µg/l TPHg and 4,700 µg/l benzene.

In 1992, Weiss Associates installed a groundwater extraction system using existing monitoring wells C-1 and C-2. The system removed approximately 1,300,000 gallons of hydrocarbon impacted groundwater and was operational from 1992 through 1994. The treatment system ceased operation in 1994, when concentrations of benzene in the source area reached 1 µg/l.

In September 2007, Chevron submitted a Site Conceptual Model and Request for Closure for the site. However, ACEH has determined that even though a groundwater extraction and treatment system was operational on site and a risk assessment was performed for contamination volatilization from groundwater to indoor air, no post remediation confirmation soil sampling has been conducted near the former source area to verify remediation effectiveness nor has soil sampling been conducted to evaluate contamination volatilization from soil to indoor air. ACEH cannot consider case closure at this time. This decision to deny closure is subject to appeal to the State Water Resources Control Board (SWRCB), pursuant to Section 25299.39.2(b) of the Health and Safety Code (Thompson-Richter Underground Storage Tank Reform Act - Senate Bill 562). Please contact the SWRCB Underground Storage Tank Program at (916) 341-5851 for information regarding the appeal process.

Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to [mail to: steven.plunkett@acgov.org](mailto:mail:steven.plunkett@acgov.org)) prior to the start of field activities.

## **TECHNICAL COMMENTS**

1. **Confirmation Soil Sampling and Source Area Characterization.** During previous site characterization and monitoring well installation activities conducted in 1983, gasoline vapors were identified in well C-1 at 11 feet bgs. However, no soil samples were collected during the installation of wells C-1 through C-5 leaving the extent of contamination in the source area undefined. In addition, soil borings installed during a subsequent investigation completed in 1992 did not collect soil samples below 10 feet bgs, leaving the vertical extent of contamination in source area undefined. During the 1992 investigation, petroleum hydrocarbon contamination was detected in soil boring BH-C at 10 feet bgs at concentrations of up to 660 ppm TPHg and 0.82 ppm benzene. Furthermore, a risk assessment performed in 1997 neglected to evaluate the potential for volatilization from residual contamination detected in unsaturated soil in the vadoze zone. As a result, the potential for vapor intrusion from soil has not been adequately evaluated. Therefore, ACEH request that you prepare a work plan to collect soil samples to evaluate the vertical extent of contamination in the source area, perform verification sampling to evaluate remediation effectiveness; evaluate the potential for volatilization of hydrocarbon contamination from the vadoze zone and thus assess the vapor intrusion pathway. Please prepare a work plan that addresses the above mentioned issues and submit work plan according to the schedule below.

## **TECHNICAL REPORT REQUEST**

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Steven Plunkett), according to the following schedule:

- **January 7, 2009** – Work Plan for Soil and Groundwater Investigation

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.swrcb.ca.gov/ust/electronic\\_submittal/report\\_rqmts.shtml](http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml)).

## **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**

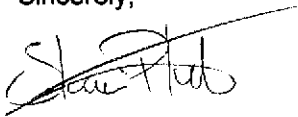
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

**AGENCY OVERSIGHT**

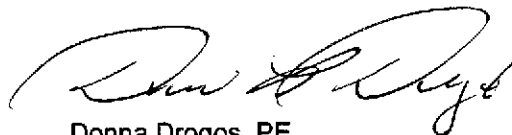
If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 383-1761 or send me an electronic mail message at [steven.plunkett@acgov.org](mailto:steven.plunkett@acgov.org).

Sincerely,



Steven Plunkett  
Hazardous Materials Specialist



Donna Drogos, PE  
Supervising Hazardous Materials Specialist

cc: Laura Genin  
CRA  
5900 Hollis Street, Suite A  
Emeryville, CA 94608

Donna Drogos, ACEH, Steven Plunkett ACEH, File