



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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May 6, 2014

Ms. Carryl MacLeod
Chevron Environmental Management Co.
6101 Bollinger Canyon Road
San Ramon, CA 94583
(sent via electronic mail to CMacleod@chevron.com)

Ms. Leslie Riasanovsky
Unknown Address

Neil & Diane Goodhue
300 Hillside Avenue
Piedmont, CA 94611

Subject: Modified Work Plan Approval; Fuel Leak Case No. RO0000138; Global ID # T0600102248; Chevron #9-0517 / Homestead Federal Savings, 3900 Piedmont Avenue, Oakland CA 94610

Dear Mesdames MacLeod, Riasanovsky, and Mr. & Mrs. Goodhue:

Alameda County Environmental Health Department (ACEH) staff has reviewed the case file, including the *First Quarter 2014 Groundwater Monitoring Report*, and the *Site Conceptual Model and Data Gap Work Plan*, both dated March 21, 2014. The reports were prepared and submitted on your behalf by Stantec Consulting Services Inc. (Stantec). Thank you for submitting the documents.

ACEH has previously evaluated the data and recommendations in case files, and reviewed the site with respect to the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on ACEH staff review, we determined that the site fails to meet the LTCP General Criteria e (Site Conceptual Model), the Media-Specific Criteria for Groundwater, the Media-Specific Criteria for Vapor Intrusion to Indoor Air, and potentially the Direct Contact and Outdoor Air Exposure Criteria (see Geotracker for a copy of the LTCP checklist). ACEH's determination is based on insufficient data and analysis to support groundwater plume delineation coupled with a lack of knowledge of vicinity water supply well locations and potential other sensitive receptors, lack of understanding of the potential for vapor intrusion into existing onsite buildings, and the lack of sufficient shallow soil samples proximal to a number of the former UST-related structures. The referenced work plan was generated as a result of this LTCP review. For more details please see the directive letter dated December 18, 2013.

Based on ACEH staff review of the work plan addendum the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed field investigation. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or technical comments below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Soil Vapor Data Collection Clarifications** – The referenced vapor work plan proposes a series of actions with which ACEH is in general agreement with; however, ACEH requests several modifications to the approach. Please submit a report by the date specified below.
 - a. **Chevron Vapor Sampling Technical Protocols** – Because the Chevron Technical Protocols are proprietary and were not disclosed with the referenced work plan, ACEH requests that a copy be forwarded for review by the date identified below.

- b. Installation Depth of Soil Vapor Wells** – The work plan proposes to install the vapor wells to a depth of 5.5 feet below grade surface (bgs); however, the LTCP states that soil vapor is to be collected at existing buildings five feet below the depth of the foundation. Consequently, ACEH requests that the depth of the vapor wells be modified to ensure this detail is observed. Provided the depth of the foundations (onsite and offsite) can be documented which will justify the depth of well installation in the requested report, further communication of the well depth is not required.
- c. Use of Dry Bentonite in Vapor Wells** – ACEH requests the use of hydrated bentonite in vapor well construction procedures. Recent ACEH experience indicates that the sole use of dry bentonite, and subsequent (insufficient) in-place hydration, can significantly skew vapor data due to generator exhaust gases that can be in the vicinity. ACEH is not opposed to a thin layer of dry bentonite immediately above the well sand interval; however, seeks to clarify that hydrated bentonite above the dry bentonite is the preferred, and requested, well construction method.
- d. Naphthalene Analytical Testing Methods** – Vapor samples are proposed to be analyzed by TO-15 for naphthalene. Please note that Department of Toxic Substance Control (DTSC) documents recommend that TO-17 should be used to confirm TO-15 sampling results (Appendix E, *Active Soil Gas Investigations Advisory*, dated April 30, 2012). In part this appears to be related to lower naphthalene concentrations when Nylaflow tubing is used to sample soil vapor. Therefore ACEH requests that TO-17 be used to confirm naphthalene results by TO-15.
- e. Helium Tracer Shroud Concentrations** – A tracer gas is proposed to be used during vapor sampling, and while analysis for helium in the vapor sample is proposed, proposed analysis for shroud helium concentrations was not found. The referenced DTSC document recommends that shroud concentrations are to be determined in order to determine the magnitude of a leak into the vapor sample concentrations, if any. The document also provides an acceptable leak magnitude (Appendix C).
- f. Not Approved - Contingency Indoor Air Sampling** – A contingency sampling plan for sub-slab, indoor and outdoor air was provided in the referenced work plan. While ACEH is in general agreement with the generalized plan, because indoor sampling locations and a copy of the indoor air pre-sampling survey were not provided, ACEH does not include approval of this scope of work with this letter.

The work plan proposed conducting a pre-sampling survey 24 hours prior to indoor air and under normal HVAC operations. Because of the potential for consumer products to complicate the interpretation of indoor air vapor samples, ACEH will request a longer advanced warning and interview period. DTSC also recommends (*Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air*, dated October 2011) that the sample duration for indoor air events should be a 24-hour period. In accordance with U.S. EPA Region 9 document (*EPA Region 9 Guidelines and Supplemental Information Needed for Vapor Intrusion Evaluations at the South Bay National Priorities List (NPL) Sites*, December 3, 2013), because HVAC operations can significantly affect sample results, ACEH will request collection of the indoor air vapor samples under worst-case conditions, such as a non-operational HVAC system and with doors and windows closed. Additional 8-hour sampling events can be conducted at that time.

Should this contingency be required, please submit proposed indoor and outdoor air sampling locations, and a copy of the indoor air pre-sampling survey form to ACEH by the date identified below, as a work plan addendum.

- 2. Well Survey** – Principally to clarify, ACEH requests that the proposed well survey utilize both Department of Water Resources (DWR) and Alameda County Public Works Agency (ACPWA) well databases as they are sufficiently different to warrant review of both.
- 3. Sensitive Receptor Survey** – Principally to clarify, and because of the difficulty in defining the length of the groundwater plume downgradient of the site, ACEH has requested that a sensitive receptor

survey be conducted. ACEH requests that the technical justification papers of the LTCP be used to estimate the likely maximum length of the groundwater plume, and determine if sensitive receptors lie within that area. As previously requested this is to include basements or other underground structures and sensitive populations.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **June 6, 2014** – Chevron Vapor Sampling Technical Protocols (via electronic mail)
- **June 27, 2014** – Work Plan Addendum (Indoor and Outdoor Sampling Locations and Indoor Air Pre-Sampling Survey Form, if required)
File to be named: RO138_WP_ADEND_R_yyyy-mm-dd
- **July 25, 2014** – Subsurface Investigation
File to be named: RO138_SWI_R_yyyy-mm-dd

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.

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.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

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

cc: Travis Flora, Stantec Consulting Services, Inc, 15575 Los Gatos Blvd, Bldg C, Los Gatos, CA 95032 (sent via electronic mail to: Travis.Flora@Stantec.com)

Dilan Roe (sent via electronic mail to dilan.roe@acgov.org)
Mark Detterman (sent via electronic mail to mark.detterman@acgov.org)
Electronic File, GeoTracker

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 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.