

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY, SUITE 250
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

October 10, 2017

(Revised)

Ms. Carryl MacLeod
Chevron Environmental Management Co.
6101 Bollinger Canyon Road
San Ramon, CA 94583

Ms. Leslie Riasanovsky
Unknown Address

Neil & Diane Goodhue
300 Hillside Avenue
Piedmont, CA 94611

(Sent via electronic mail to: CMacleod@chevron.com)

Subject: Request for Closure Response; Fuel Leak Case No. RO0000138; Global ID # T0600102248; Chevron #9-0517 / Homestead Federal Savings, 3900 Piedmont Avenue, Oakland CA 94610

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

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file, including the *First Quarter 2017 Annual Groundwater Monitoring Report*, dated March 24, 2017, and the *Site Assessment Report and Request for Closure*, dated August 11, 2017. The reports were prepared and submitted on your behalf by Stantec Consulting Services Inc. (Stantec). Thank you for submitting them.

ACDEH has evaluated site data, in conjunction with the case files, to determine if the site is eligible for closure as a low risk site under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on ACDEH staff review, we have determined that the site fails to meet the Media-Specific Criteria for Vapor Intrusion (see Geotracker for an updated list); however, with the collection of limited additional data, it may be appropriate to move the case towards closure.

Based on the review of the case file ACDEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

- 1. LTCP Media Specific Criteria for Vapor Intrusion to Indoor Air** – The LTCP describes conditions, including bioattenuation zones, which if met will assure that exposure to petroleum vapors in indoor air will not pose unacceptable health risks to human occupants of existing or future site buildings, and adjacent parcels. Appendices 1 through 4 of the LTCP criteria illustrate four potential exposure scenarios and describe characteristics and criteria associated with each scenario.

Our review of the case files indicates that the site data collection and analysis fail to support the requisite characteristics of one of the four scenarios, or an alternative pathway within the LTCP has not been conducted (site specific risk assessment) or is not yet appropriate (regulatory finding). The four scenarios employ the use of bioattenuation zones, groundwater concentrations of benzene, or direct soil vapor sampling at a depth of five feet below building foundations. Specifically, although groundwater benzene concentrations at the site are less than 100 micrograms per liter ($\mu\text{g/l}$), and the depth to water has been as shallow as 4.85 feet below grade surface (bgs), the site lacks a bioattenuation zone as defined by the LTCP due to concentrations of Total Petroleum Hydrocarbons as gasoline or diesel (TPHg or TPHd, respectively) greater than 100 mg/kg within five feet directly beneath the foundation of the existing building (FNBO-5, FNBO-7, and B-4). Additionally no soil gas samples have been collected at a depth of five feet below the building foundation to directly measure soil gas concentrations in accordance with the LTCP due to difficulties in installing vapor probes within

the existing building and shallow groundwater depths (as shallow as two feet bgs in the recent investigation). Rather, sub-slab vapor samples and concurrent indoor air samples have been collected and compared to Environmental Screening Levels (ESLs) as promulgated by the San Francisco Bay Regional Water Quality Control Board (RWQCB), and crawl-space vapor samples have been collected beneath the closest downgradient building.

While ACDEH is in agreement that the sub-slab vapor results are below all applicable sub-slab vapor ESLs, in particular the LTCP Chemicals of Concern, benzene, ethylbenzene, and naphthalene vapor concentrations, the presence of benzene in indoor air samples is consistently above indoor air ESLs. Additionally, while naphthalene is consistently non-detectable in indoor air, the laboratory reporting limit for naphthalene is consistently above the ESL for naphthalene in indoor air, and is notably above the outdoor air naphthalene reporting limit.

ACDEH notes that the limited success in collecting soil samples beneath the building (three of four bores in close proximity to the current building could not be completed as planned due to refusal), coupled with the indoor air vapor sample results, may indicate the presence of undetected residual petroleum hydrocarbons at concentrations beneath the building sufficient to affect indoor air concentrations of benzene, and perhaps naphthalene. At the same time, ACDEH also acknowledges the potential effect the relatively recent interior building remodeling (reported within one year) may have on indoor air concentrations; however, with the collection of limited additional data, this may be discernable in the near future.

With regards to the crawl space vapor samples at the downgradient commercial building, benzene concentrations in the two crawl space vapor samples have either been respectively, below and above, indoor air ESLs, and during the recent sampling event were two to four times higher than outdoor air samples depending on the outdoor air sample used for comparison purposes. As above, with the collection of additional data, it may be possible to better determine a trend in the crawl space vapor concentrations.

Therefore, please present a strategy in a Data Gap Work Plan described in Technical Comment 2 below to collect sufficient additional data to determine vapor trends onsite and offsite.

2. **Data Gap Work Plan** – Please prepare a Data Gap Work Plan to address the technical comments listed above. Please sequence activities in the proposed revised data gap investigation scope of work to enable efficient data collection in the fewest mobilizations possible. Please reference existing Standard Operating Procedures (SOPs) in order to expedite generation, and review, of the work plan.
3. **Monitoring Well Survey** – Review of Geotracker indicates that site wells have not been surveyed to Geotracker well survey standards. Please correct this situation and upload required XYZ files to Geotracker. This is a state requirement that ACDEH is tasked with managing and will hold up closure. This is the second request for this action item.
4. **Groundwater Monitoring** – Please continue to collect conduct groundwater sampling at the subject site. Please submit the annual report by the date requested below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH 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:

- **December 22, 2017** – Data Gap Work Plan and upload of XYZ Data to Geotracker
File to be named: WP_R_yyyy-mm-dd
- **March 30, 2018** – Annual Groundwater Monitoring Report
File to be named: RO138_GWM_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, ACDEH, (Sent via electronic mail to: dilan.roe@acgov.org)

Paresh Khatri, ACDEH; (Sent via electronic mail to: paresh.khatri@acgov.org)

Mark Detterman, ACDEH, (Sent via electronic mail to: mark.detterman@acgov.org)

Electronic File; GeoTracker

Attachment 1

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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) 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 File Transfer Protocol (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 SCP 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 (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/) for more information on these requirements.

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the SWRCB's GeoTracker website." 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 6731, 6735, and 7835) 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 licensed 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 case meet this requirement. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

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: December 1, 2016
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions


The Alameda County Environmental Cleanup Oversight Programs (LOP 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) Open File Explorer using the Windows  key + E keyboard shortcut.
 - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) On the address bar, type in ftp://alcoftp1.acgov.org.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
 - d) Click Log On.
 - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - f) 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.