



**CONESTOGA-ROVERS
& ASSOCIATES**

10969 Trade Center Drive
Rancho Cordova, California 95670
Telephone: (916) 889-8900 Fax: (916) 889-8999
www.CRAworld.com

June 30, 2011

Reference No. 631656

RECEIVED

10:41 am, Jul 01, 2011

Alameda County
Environmental Health

Mr. Mark Detterman, P.G., C.E.G.
Alameda County Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Re: Response to Technical Comments and Additional Information Request
Former Chevron Service Station 9-7127
10 Grant Line Road
Tracy, California
LOP Case #RO0000185

Dear Mr. Detterman:

On behalf of Chevron Environmental Management Company (Chevron), Conestoga-Rovers & Associates (CRA) has prepared this letter to address the Technical Comments (1-4) and/or provide the additional requested information regarding the referenced site requested by Alameda County Environmental Health (ACEH) in a letter dated April 27, 2011 (Attachment A). The Technical Comments are discussed individually below.

Technical Comment #1 - Well and Bore Placement Clarification

CRA recently submitted the March 14, 2011 *Work Plan for Additional Investigation* (work plan) in which the installation of seven additional monitoring wells and the drilling of five additional exploratory borings were proposed. The proposed well locations were selected to accommodate the planned new service station development at the site. However, the planned development was not shown on the site plan provided with the work plan; therefore, ACEH requested submittal of a revised site plan including the planned development. Please note that a due date of May 20, 2011 was originally specified in the April 27, 2011 letter for submittal of the revised site plan. However, only recently were we able to obtain the development plans electronically so as to accurately place them on the site plan. We had updated ACEH periodically via e-mail on the status of this request and that we would not meet this deadline, and a formal extension of this due date to July 15, 2011 was granted by ACEH in an e-mail to CRA on June 28, 2011.

CRA Response: A revised site plan including the planned development was provided electronically to ACEH via e-mail on June 28, 2011, and the proposed well and boring locations were subsequently approved in an e-mail to CRA the same day.

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Technical Comment #2 – Well Survey

In the work plan, it stated that the locations and top of casing elevations of the newly installed wells would be surveyed to GeoTracker standards. ACEH requested that the existing wells also be included in the survey as they have not been surveyed to GeoTracker standards.

CRA Response: CRA concurs that the existing wells should be included in the planned survey as there may be differences in the datum that was previously used and that currently used, possibly resulting in incorrect groundwater flow direction information. Therefore, the existing wells will also be surveyed to GeoTracker standards at the same time as the newly installed wells.

Technical Comment #3 – Well MW-8 Repair

In 2008, the aboveground stovepipe of well MW-8 was hit by a vehicle causing damage to both the stovepipe and the well casing. This well has not been able to be sampled since April 2008 due to the damage incurred. As such, ACEH requested that this well be repaired so that it can be redeveloped and sampled once again.

CRA Response: With the exception of low, anomalous concentrations during one event, petroleum hydrocarbons have not been detected in MW-8 (data back to 1995). Additionally, this well is located in the cross-gradient direction, approximately 100 feet from the former source area. Based on this information, it is our opinion that this well does not provide significant enough data to warrant the cost of repair, and it should be abandoned. However, installation of a new well between the source area and MW-8 is planned as part of the upcoming investigation that should provide the necessary data in this direction. Therefore, as ACEH has expressed concern regarding MW-8, we propose evaluating its final disposition based on the sampling results in this new well. If significant concentrations of petroleum hydrocarbons are not detected in groundwater from the new well, then MW-8 will be abandoned. Conversely, if significant concentrations of petroleum hydrocarbons are detected in the new well, MW-8 will be repaired, redeveloped, and sampling resumed.

Technical Comment #4 – Groundwater Supply Well Sampling

ACEH requested clarification of the sampling methodology used for the onsite water supply well (WSW-1) as well as where the samples are actually collected, as these details have not been reported for a significant amount of time.

CRA Response: The water supply well formerly supplied the station (reportedly restroom operation only as water non-potable) and is currently only used for livestock by the adjacent ranch owner. The well is sampled annually during the second quarter. A carbon treatment system was installed in May 1989 due to detections of benzene; the work was documented in the September 14, 1989 *Sampling Data Summary*, prepared by GeoStrategies, Inc. The system



**CONESTOGA-ROVERS
& ASSOCIATES**

June 30, 2011

3

Reference No. 631656

appears to have been removed in the early to mid-1990s, possibly when the station was demolished in 1991; however, the exact date is unknown. Previous samples were collected from nearby taps or a wellhead drain cock. In recent years, however, grab samples have been collected from the well by opening the lid and using a bailer. We are attempting to determine the disposition of this well with regards to the planned development.

We appreciate your assistance on this project and look forward to your reply regarding MW-8. Please contact James Kiernan at (916) 889-8917 if you have any questions or need any additional information.

Sincerely,

CONESTOGA-ROVERS & ASSOCIATES

A handwritten signature in blue ink, appearing to read 'JK', with a long horizontal stroke extending to the right.



James P. Kiernan, P.E.

JK/kw/2

Attachment A ACEH Letter Dated April 27, 2011

cc: Ms. Olivia Skance, Chevron (electronic copy only)
 Mr. Ardavan Onsoni, DM Livermore, Inc.



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

April 27, 2011

Ms. Stacie H. Frerichs
6001 Bollinger Canyon Road K2256B
PO Box 6012
San Ramon, CA 94583-2324
(sent via electronic mail to:
staciehf@chevron.com)

Mr. Onsori Ardavan
37 Victoria Drive
Atherton, CA 94027-4122

Frances & Louis Carnazzo
Carnozzo Land Co, Inc, et al
P.O. Box 6031
Atascadero, CA 93423-6031

Ahmad & Shahla Mostofi
37 Victoria Drive
Atherton, CA 94027-4122

Subject: Approval With Modifications to Work Plan; Fuel Leak Case No. RO0000185 (Global ID #T0600102298), Chevron #9-7127, I 580 and Grant Line Road, Tracy, CA

Dear Responsible Parties:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Work Plan for Additional Investigation*, dated March 14, 2011 and the *Second Semi-Annual 2010 Groundwater Monitoring Report*, dated January 17, 2011, each was prepared on your behalf by Conestoga-Rovers & Associates (CRA). The work plan proposed the installation of seven groundwater monitoring wells and five soil bores, and includes the collection of grab groundwater from the five soil bores.

Based on ACEH staff review of the work plan, 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. **Well and Bore Placement Clarification** – The Work Plan states that the proposed wells and soil bores have been placed to accommodate the planned redevelopment configuration; however, that configuration is not included in Work Plan figures which would allow an understanding of the locations. ACEH requests submittal of a revised bore placement figure with those details prior to work initiation, with the potential to adjust or modify bore locations. Please submit the revised figure by the date identified below.
2. **Well Survey** - The work plan proposes to survey wells to GeoTracker standards for upload to the state database. Principally as a clarification, please include existing wells into the survey as these wells have not previously been surveyed to these standards. This should include a repaired well MW-8 (see next comment).

3. **Well MW-8 Repair** – Please include the repair of this well in the next site investigation mobilization to the site to ensure it is included in the aforementioned well survey. Because the well has not been sampled since April 2008, ACEH also requests that the well be redeveloped in the next scheduled well development mobilization to the site, in order for it to be included in the next scheduled groundwater monitoring event. Based on a history of non-detectable analytical results it is likely well sampling will resume an annual or less frequent sampling interval; however, this determination will depend on the results of the first resampling event.
4. **Groundwater Supply Well Sampling** – Review of the referenced groundwater monitoring report does not include the sampling location or methodology used to collect the sample. It is not clear if the sampling point is located after the carbon treatment system that is reported to have been installed on the well. ACEH requests clarification of both the sampling methodology and location as these details do not appear to have been reported for a significant period of time. If this is incorrect, please refer ACEH to the reporting document(s).

TECHNICAL REPORT REQUEST

Please submit the following deliverable to ACEH (Attention: Mark Detterman), according to the following schedule:

- **May 20, 2011** – Work Plan Addendum (Revised Site Plan)
- **July 15, 2011** – Soil and Groundwater Investigation Report
- **60 Days After Soil & Groundwater Investigation Response Letter** – FS/CAP or additional appropriate work plan

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.

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
Hazardous Materials Specialist

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

cc: James Kiernan, 10969 Trade Center Drive, Suite 106, Rancho Cordova, CA 95670
(sent via electronic mail to jkiernan@croworld.com)

Donna Drogos, ACEH, (sent via electronic mail to donna.drogos@acgov.org)
Mark Detterman, ACEH, (sent via electronic mail to mark.detterman@acgov.org)
Geotracker, Electronic 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 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.