



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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July 10, 2014

Ms. Carryl MacLeod
Chevron Environmental
Management Company
6001 Bollinger Canyon Road
San Ramon, CA 94583
(sent via electronic mail to: CMacleod@chevron.com)

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

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

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

Subject: Request for Feasibility Study / Corrective Action Plan; Fuel Leak Case No. RO0000185
(Global ID #T0600102298), Chevron #9-7127, I 580 and Grant Line Road, Tracy, CA

Dear Ladies and Gentlemen:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including the *Additional Site Assessment Report*, dated February 6, 2014 and the *First Quarter 2014 Groundwater Monitoring Report*, dated May 12, 2014. The reports were prepared and submitted on your behalf by ARCADIS US, Inc. (ARCADIS). Thank you for submitting the reports.

Thank you also for attending the meeting of July 8, 2014, to further discuss these documents and the site. The meeting, between ACEH LOP and Land Use Programs staff, Chevron, ARCADIS, and Acorn Onsite, the septic system design consultant for the property owner, was conducted to discuss a strategy to integrate the timeline for site investigation and remediation, and the timeline for site redevelopment. As discussed in a directive letter dated July 9, 2014, the property owner failed to attend the meeting, and to provide a current site development update that would allow for the integration of the two timelines. To allow the integration of the two timelines, to the extent practicable, deadlines for the submittal of data by Mr. Onsori to Chevron were requested by August 9, 2014 (**not August 23, 2014 as inadvertently partly stated**), in the July 9, 2014 directive letter. The lack of data by August 9, 2014, will result in ACEH and Chevron proceeding with site cleanup without consideration of the redevelopment timeline.

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

TECHNICAL COMMENTS

- 1. Water Supply Well Destruction** – Based on the recent video log of the well casing, and as discussed in the directive letter dated July 9, 2014 to Mr. Ardavan, the upper portion of the existing water supply well is screened in the same water bearing zone contaminated by the release of petroleum fuels from the former service station at the site. Although groundwater concentrations from groundwater collected from the well are non-detectable, the well is essentially located within the core separate-phase and very high dissolved-phase plumes, and thus ACEH regards the well to be a highly capable vertical conduit for subsurface contamination and a public health risk associated with site development. Therefore, ACEH requires the documentation of the contracting of well destruction by the date identified below.
- 2. Interim Remedial Actions (LNAPL Product Recovery)** – As discussed at the meeting, it is appropriate to resume recovery of Light Non-Aqueous Phase Liquid (LNAPL) at the subject site.

While the referenced site investigation report indicates that LNAPL mobility is stable and not migrating beyond the current extent, ACEH's review of the four LNAPL wells indicates the migration of LNAPL into wells MW-1, MW-3, MW-10, and MW-11 at different periods of time after their initial sampling ranged from 9 months to 16 years. This data does not support a stable non-migrating LNAPL plume. Ultimately this may affect the existing water supply well, located in proximity to three of these wells, without its destruction. Therefore, ACEH requests the identification, installation, and reporting on an appropriate continuous interim LNAPL recovery method by the date identified below. Please also document the planned installation of the downgradient well discussed at the meeting in this report.

- 3. Feasibility Study / Draft Corrective Action Plan** – Although the referenced site investigation report indicates that historic efforts at LNAPL recovery have yielded poor results, the report also concludes that potentially significant volumes of LNAPL may be recovered. ACEH is in general agreement with these assessments, and notes that limited historic recovery efforts have documented sufficient LNAPL mobility at the site to allow recovery.

At this time, a Draft Feasibility Study / Corrective Action Plan (FS/CAP) prepared in accordance with Title 23, California Code of Regulations, Section 2725 appears warranted. The FS/CAP must include a concise background of soil and groundwater investigations performed in connection with this case and an assessment of the residual impacts of the chemicals of concern (COCs) for the site and the surrounding area where the unauthorized release has migrated or may migrate. The FS/CAP should also include, but is not limited to, a detailed description of site lithology, including soil permeability, and most importantly, contamination cleanup levels and LTCP appropriate cleanup goals in accordance with the Central Valley Regional Water Quality Control Board (RWQCB) Basin Plan. Please note that soil cleanup levels should ultimately (within a reasonable timeframe) achieve water quality objectives (cleanup goals) for groundwater in accordance with the Central Valley RWQCB Basin Plan. Please specify appropriate cleanup levels and cleanup goals in accordance with 23 CCR Section 2725, 2726, and 2727 in the CAP.

The FS/CAP should incorporate site development plans, including the septic system design and the location of the new water supply well, as provided to Chevron and ACEH by August 9, 2014. The CAP must evaluate at least three viable alternatives for remedying or mitigating the actual or potential adverse affects of the unauthorized release(s) besides the 'no action' and 'monitored natural attenuation' remedial alternatives. Each alternative shall be evaluated not only for cost-effectiveness but also its timeframe to reach cleanup levels and cleanup goals, and ultimately the Responsible Party must propose the most cost-effective corrective action. Please submit the Draft FS/CAP by the date identified below.

- 4. Groundwater Monitoring** – Please continue to conduct quarterly groundwater monitoring at the subject site and submit report on the schedule listed below.

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 Attachment 1 and the specified file naming convention below, according to the following schedule:

- **August 9, 2014** – Septic System Design and New Water Supply Well Location for FS/CAP Design Consideration (See July 9, 2014 directive letter); File to be named: RO185_MISC_R_YYYY-mm-dd
- **August 15, 2014** – Second Quarter 2014 Groundwater Monitoring Report
File to be named: RO185_GWM_R_YYYY-mm-dd
- **September 12, 2014** – Interim Remedial Action (LNAPL Recovery and Well Installation Report)
File to be named: RO185_IR_R_YYYY-mm-dd
- **November 14, 2013** – Third Quarter 2013 Groundwater Monitoring Report
File to be named: RO185_GWM_R_YYYY-mm-dd

- **December 12, 2014** – Draft FS / CAP
File to be named: RO185_DRAFT_FS/CAP_R_YYYY-MM-DD
- **February 13, 2015** – Fourth Quarter 2014 Groundwater Monitoring Report
File to be named: RO185_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.

If your email address is not listed on the first page of this letter, ACEH is requesting your email address to help expedite communications and to help lower overall costs. Please provide that information in the next submittal.

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 and
Electronic Report Upload (ftp) Instructions

cc: Ms. Alexis Fischer, Chevron Environmental Management Company, 6101 Bollinger Canyon Road, San Ramon, CA 94583; (sent via email to AFischer@chevron.com)

Tonya Russi, ARCADIS US, Inc, 950 Glenn Drive, Suite 125, Folsom, CA 95630
(sent via electronic mail to Tonya.Russi@arcadis-us.com)

Gary Grimm, Law Office of Gary J. Grimm, 2390 Vine Street, Berkeley, CA 94708, (sent via electronic mail to gjgrimm@mindspring.com)

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

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

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: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 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.