

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

May 10, 2017

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
(Sent via electronic mail to:
dmbasmatirice@yahoo.com)

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 LNAPL Remedial Design and Implementation 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 Department of Environmental Health (ACDEH) staff thanks you for attending the stakeholder meeting regarding the site that was held in our office on May 8, 2017. The meeting established that the planned site redevelopment as a service station and convenience store has progressed substantially since previous meetings and communications. The reinstallation of an onsite water supply well for the redevelopment water supply was communicated to be permitted by the Zone 7 Water Agency in the meeting, but installation is pending additional progress in site redevelopment due to potential planning changes.

As previously observed, pilot tests completed for the Corrective Action Plan (CAP) Addendum found that Dual Phase Extraction (DPE) was not a viable method of corrective action due to the significant recharge capability of the water-bearing zone and the lack of infrastructure for disposal of the extracted groundwater at the site. The CAP Addendum also found that Air Sparging / Soil Vapor Extraction (AS/SVE) is a viable corrective action method and the pilot test extracted substantial vapor phase hydrocarbons. Over the course of the pilot test Total Petroleum Hydrocarbons as gasoline (TPHg) was extracted at an average 720 pounds per day (lbs/day) and benzene was extracted at an average of 10.18 lbs/day. Instrument readings indicated the Lower Explosive Level (LEL) was 100% in piezometer PZ-1. It was also determined that the pilot test wells had an approximately 50-foot Radius-of-Influence (ROI; at 1% applied vacuum), but that influences up to 79 feet were documented in multiple wells.

The CAP Addendum evaluated AS/SVE over a 24 month period, and limited Light Non Aqueous Phased Liquid (LNAPL) removal with monitoring of Natural Source Zone Depletion (NSZD) over a 25 year period and found the NSZD option to be the least expensive option.

Based on the results of the discussions in the meeting, and consistent with previous communications, ACDEH requests that you address the following technical comments, and send us the document requested below.

TECHNICAL COMMENTS

- 1. LNAPL Remedial Design and Implementation Plan (RDIP) –** As communicated in the meeting ACDEH is in not in agreement that NSZD is an appropriate clean up technology at the site due to the lack of removal of the substantial volume of LNAPL which is located beneath the site.

Thus based on the discussions in the meetings, it is appropriate to request the submittal of a Remedial Design and Implementation Plan (RDIP) for AS/SVE corrective actions at the site associated with the removal of LNAPL from beneath the site. An RDIP is comprised of the following design parts for review and approval:

- a. Air Sparge / Soil Vapor Extraction system design and installation details; plans and specifications using the proposed updated redevelopment site plan as a base map.
- b. Monitoring well decommissioning and reinstallation, as necessary to facilitate site redevelopment.
- c. Proposed cleanup goals and the basis for the cleanup goals.
- d. Proposed post-remediation confirmation sampling and monitoring.
- e. Schedule for implementation of the cleanup, and sequencing with site development.

Please be aware that public participation is a requirement for the Corrective Action Plan process. Upon ACDEH approval of the RDIP, ACDEH will notify potentially affected members of the public who live or own property in the surrounding area of the proposed remediation described in the CAP and the RDIP. Public comments on the proposed remediation will be accepted for a 30-day period.

2. **Vapor Mitigation** – As was established in the meeting, the property owner is currently working with the Alameda County Planning Department on the approval to redevelop the site as a new service station and convenience store. It is our understanding based on discussions with the planning department and the property owner, that planning approval will be complete in the summer of 2017 and that building permits will be submitted in the fall of 2017. Therefore, a vapor intrusion assessment, including an assessment of methane generation from the biodegradation of the LNAPL plume, may be required to facilitate site redevelopment. The requirements for the evaluation will be determined upon design approval by the planning department and submittal of the building permit application.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

Please note that ACDEH has updated Attachment 1 with regard to report submittals to ACDEH. ACDEH will now be requiring a Submittal Acknowledgement Statement, replacing the Perjury Statement, as a cover letter signed by the Responsible Party (RP). The language for the Submittal Acknowledgement Statement is as follows:

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.

Please make this change to your submittals to ACDEH.

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

- **May 12, 2017 – First Quarter 2017 Semi-Annual Groundwater Monitoring and Sampling**
File to be named: RO185_GWM_R_YYYY-mm-dd
- **August 11, 2017 – LNAPL Remedial Design and Implementation Plan**
File to be named: RO185_RDIP_R_YYYY-mm-dd
- **December 15, 2017 – Second Quarter 2017 Semi-Annual Groundwater Monitoring and Sampling**
File to be named: RO185_GWM_R_YYYY-mm-dd


Ladies and Gentlemen
RO0000185
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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, ACDEH 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,

A handwritten signature in blue ink, appearing to read "Mark E. Detterman", with a stylized flourish at the end.

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: 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)

Vera Fischer, Central Valley Regional Water Quality Control Board, 11020 Sun Center Drive #200, Rancho Cordova, CA 95670-6114, (Sent via electronic mail to: vera.fischer@waterboards.ca.gov)

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.