

From: Roe, Dilan, Env. Health
To: ["espino@chevron.com"](mailto:espino@chevron.com)
Bcc: [Drogos, Donna, Env. Health](#)
Subject: Fuel Leak Case No. RO00000206, Chevron #9-5542, 7007 San Ramon Blvd, Dublin, CA
Date: Monday, February 11, 2013 9:56:00 AM
Attachments: [Low threat policy 2012-08-28.pdf](#)
[ACEH CHECKLIST v1 RP Revised 2012-12-06.pdf](#)

Hi Catalina:

Subsequent to our phone conversation this morning I performed a quick scan of the case files for the subject site. Based on this review it appears that ACEH issued the following two directive letters in 2010:

August 26, 2010 Directive Letter – ACEH generally concurred with the recommendations presented in the document entitled “*Soil Vapor Quality Evaluation, Feasibility Study, and Corrective Action Plan*”, dated December 2, 2009, and prepared by Conestoga-Rovers & Associates (CRA), that monitored natural attenuation appears to be the most cost-effective and technically feasible remedial alternative to achieve the cleanup goals at the site within a reasonable timeframe and to conduct one additional year of groundwater monitoring. ACEH generally concurred with CRA's proposed scope of work, however, requested an additional round of soil vapor sampling (two seasonal events) to adequately evaluate vapor intrusion risk prior to case closure consideration.

October 29, 2010 Directive Letter - ACEH generally concurred with CRA's recommendation in the document entitled, “*Second Semi-Annual 2010 Groundwater Monitoring and Sampling*”, dated October 6, 2010, to suspend groundwater monitoring and evaluate the case for closure pending submittal of the requisite soil vapor sampling data.

In the document entitled “*Results of Additional Soil Sampling Event*” dated April 5, 2011, CRA presents the results of the soil vapor sampling and concludes no further investigation appears warranted and recommends low-risk case closure.

Subsequent to this last submittal, the State Water Resources Control Board (SWRCB) adopted the *Low Threat Underground Storage Tank Case Closure Policy* (LTCP). In accordance with the SWRCB's CA LUFT Manual (September 2012), ACEH has developed Case Closure Request requirements in order to “help the closure process proceed more efficiently”. We request that you review each of the general and media specific criteria established in the LTCP and provide an evaluation of each criteria in a formal Request for Closure (RFC) document. The supporting information must be provided within the format of a technical report that is prepared, signed, and stamped by a California Professional Geologist or Engineer. The thoroughness of the technical report will facilitate timely review and ultimately case closure.

Please note that ACEH's case closure evaluation is guided by the application of the principles and strategies presented in the CA LUFT Manual. This guidance document was developed by the SWRCB “...[t]o provide guidance for implementing the requirements established by the Case Closure Policy” and associated reference documents including but not limited to:

Technical Justification for Vapor Intrusion Media-Specific Criteria, SWRCB dated March 21, 2012;

Technical Justification for Groundwater Media-Specific Criteria, SWRCB dated April 24, 2012;

Technical Justification for Soil Screening Levels for Direct Contact and Outdoor Air Exposure Pathways, SWRCB dated March 15, 2012;

Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air, Final DTSC, dated October, 2011.

ACEH also utilizes other case review tools developed by the SWRCB to aid in determining compliance

of a fuel leak site with LTCP criteria, including both the paper *Policy Checklist* (available at www.waterboards.ca.gov/ust/docs/checklist.pdf) and the electronic version of the *Policy Checklist* (available on GeoTracker at (<http://geotracker.waterboards.ca.gov>)).

While ACEH embraces the Policy we are concerned that the brevity of the SWRCB checklist can result in inaccurate conclusions regarding recommendations for case closure and uncertainty regarding the decision making process. Therefore, ACEH has developed the following additional tools to aid in the evaluation process:

- *ACEH Guidance for Case Review under Low-Threat Closure Policy* - This document provides ACEH's guidance for case review under the Policy and identifies minimum information to be provided in the RFC.
- *ACEH LTCP Data Gap Identification Tool Checklist (DGIT)* - This enhanced LTCP checklist integrates the requisite level of questioning to enable consistent application of the LTCP, ensure that decisions are founded in appropriate technical basis, identify impediments to closure, improve the efficiency of the UST cleanup program, and document the decision-making process as transparently as possible for all interested parties.

We encourage Chevron to utilize these tools as well during the preparation of the RFC for the subject site. I have attached a copy of each of these documents to this email correspondence.

I look forward to moving this case forward with you as expeditiously as possible.

Thank-you,

Dilan Roe, P.E.

Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
510.567.6767; Ext. 36767
QIC: 30440
dilan.roe@acgov.org

PDF copies of case files can be reviewed/downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>