ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
ALEX BRISCOE, Agency Director

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
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July 6, 2015

Walter Sprague
Pacific Convenience & Fuel
7180 Knoll Center Parkway, Suite 100
Pleasanton, CA 94566
(Sent via E-mail to WSprague@pcandf.com*)*

Ed Ralston
Phillips 66 Company
76 Broadway, Sacramento, CA 95818
(*Sent via E-mail to: Ed.C.Ralston@p66.com*)

Clover Trust 1997-1
c/o: ConocoPhillips Co RE
PO Box 1539
Paso Robles, CA 93447-1539

Convenience Retailers LLC
c/o: Smart Business Advisory
7180 Knoll Center Parkway, Suite 100
Pleasanton, CA 94566

Unocal Corp.
c/o: Tim Howard
6001 Bollinger Canyon Rd
San Ramon, CA 94583

Kayo Oil Company
c/o: Real Estate Admin.
315 S. Johnstone # 810G
Bartlesville, OK 74004-0001

Subject: Conditional Approval of Work Plan and Addendum for Fuel Leak Case No. RO0000219 and GeoTracker Global ID T0600101476, UNOCAL #5043, 449 Hegenberger Road, Oakland, CA 94621

Dear Responsible Parties:

Thank you for the recently submitted Figures 2 and 3 provided as attachments to an email dated June 24, 2015. The figures were prepared by Antea Group USA, Inc. (Antea) for the subject site. Alameda County Environmental Health (ACEH) staff has reviewed the case file including the two referenced figures.

Figure 2 depicts the revised locations of off-site soil bores SB-11 and SB-12, relocated due to property access issues. Figure 3 depicts the locations of three additional soil borings to aid in defining the extent of contamination in proposed excavation area A2. The proposed scope of work may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. Submittal of a revised work plan is not required unless an alternate scope of work outside that described in the work plan and technical comments below is proposed.

TECHNICAL COMMENTS

1. **Excavation A2 Boring Locations –** The three soil boring locations as depicted on Figure 3 are generally acceptable to ACEH. The proposed soil bores are advanced to determine null points for the excavation. ACEH requests the middle boring depicted on the figure be moved to the northeast across the curb. ACEH has indicated the approximate revised location on Figure 2 as an attachment. The intent of this is request is to keep the locations of the proposed borings approximately the same distance from the current excavation limits.

   Please be aware that, at a minimum, the A2 excavation is requested to extend beyond the locations of existing monitoring well MW-14 and bore B-4 and that these borings will serve as guidance for field operations. The limits of the excavation should be determined by observations made in the field through the

use of olfactory and visual senses and with the use of field instrumentation such as a photoionization detector (PID) as well as the analytical results from the three proposed bores.

2. **Off-site Boring Locations –**Revised Figure 3, as provided to ACEH, documents the proposed revised locations for soil bores SB-11 and SB-12. The bores are approximately 200 feet farther from the site than those previously proposed. In order to quickly gather data and to minimize the potential for gaps in defining the groundwater plume extent, ACEH requests an additional boring be added. The additional boring should be situated approximately 100 feet to the southeast of the proposed SB-12 location and located along the line defined by the proposed locations for SB-11 and SB-12.

   ACEH has indicated the approximate location of requested third off-site boring on Figure 3 as an attachment.

3. **Area A2 Sampling –** The email cover provided with the figures states that samples recovered from the soil bores for the area A2 delineation will be collected for analysis based on PID readings, changes in lithology, if any, and at the bottom of each hole.

   ACEH requests that soil samples be collected and analyzed at intervals of no more than five feet, areas of obvious contamination, the soil/groundwater interface, and at significant changes in lithology.

4. **Area A2 Laboratory Analysis –** The email cover provided with the figures states that samples recovered from the soil bores for the area A2 delineation will be analyzed for TPHd (with silica gel cleanup) by EPA Method 8015M and TPHg, BTEX, MTBE, TBA, DIPE, ETBE, TAME, ethanol, EDB, and 1-2, DCA by EPA Method 8260B.

   ACEH requests that soil samples additionally be analyzed for TPHd without silica gel clean up. This is in conformance with recommendations from the San Francisco Bay Regional Water Quality Control Board.

5. **Off-site Area Laboratory Analysis –** Though the purpose of the off-site borings is to define the down gradient extent of the contaminant plume, ACEH requests soil sample collection be performed based on substantial PID readings and at the soil/groundwater interface. The results of the soil sample analyses will be used as a secondary line of evidence for any potential impacts at the boring locations. Laboratory analysis should include the above listed chemicals of concern.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Keith Nowell), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **August 21, 2015 – Soil and Groundwater Investigation** (file name: RO0000219_SWI_R_yyyy-mm-dd)
- **August 31, 2015 – Soil Excavation Report** (file name: RO0000219_EX_R_yyyy-mm-dd)

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.
Thank you for your cooperation. If you have any questions or concerns regarding this correspondence or your case, please call me at (510) 567-6764 or send me an electronic mail message at *keith.nowell@acgov.org*.

Sincerely,

Keith Nowell

Digitally signed by Keith Nowell
DN: cn=Keith Nowell, o=Alameda County, ou=Department of Environmental Health, email=keith.nowell@acgov.org, c=US
Date: 2015.07.06 12:36:56 -07'00'

Keith Nowell, P.G., C.HG.
Hazardous Materials Specialist

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

Attachment 2- Revised Figure 2 and Figure 3

cc: Dennis Dettloff, Antea Group, 11050 White Rock Road, Suite 110, Rancho Cordova, CA 95670
(Sent via E-mail to: dennis.dettloff@anteagroup.com)

Dilan Roe (*Sent via E-mail to: dilan.roe@acgov.org*)
Keith Nowell, ACEH (*Sent via E-mail to: keith.nowell@acgov.org*)
GeoTracker, 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)

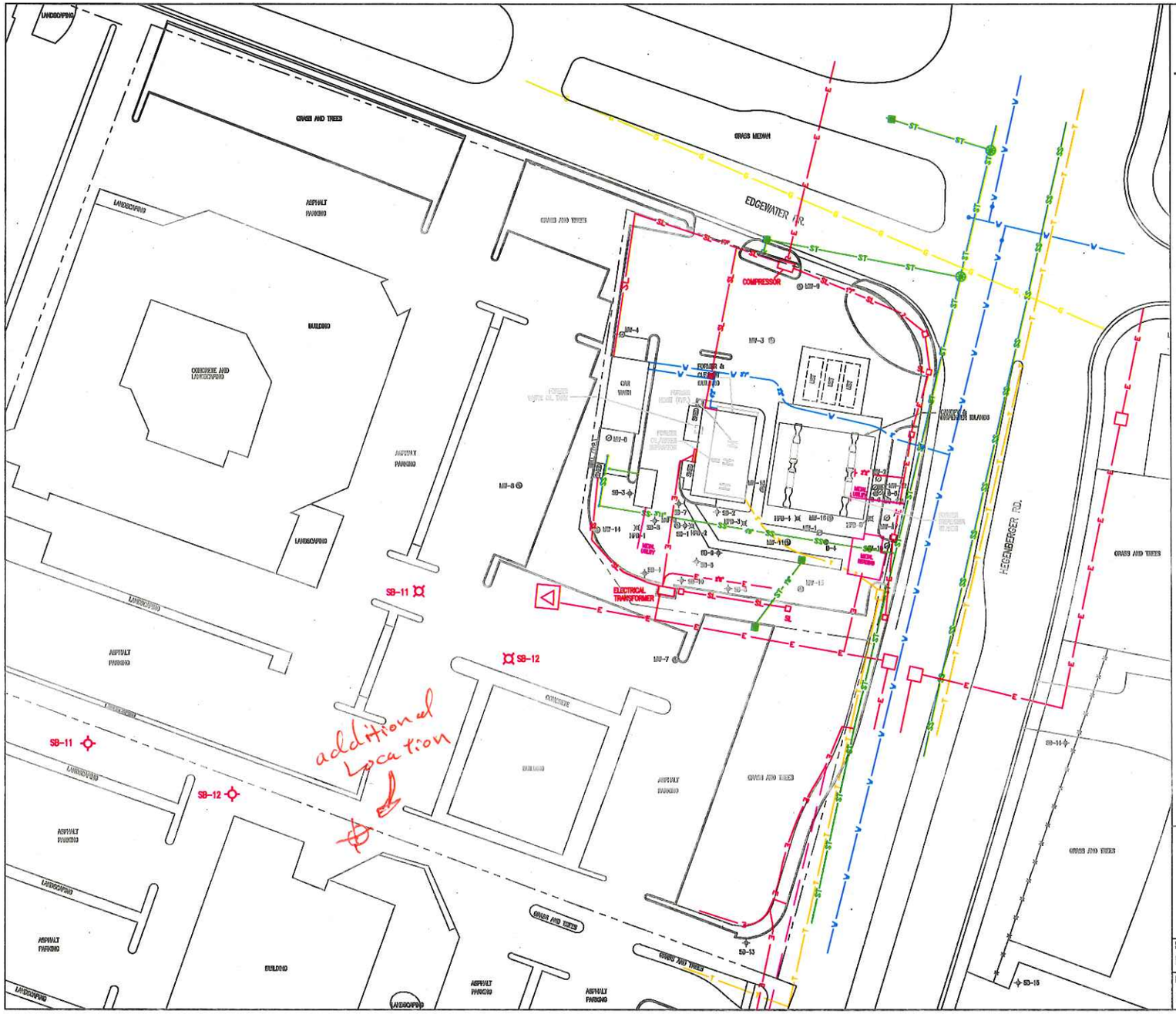
Submission Instructions

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.

ATTACHMENT 2



LEGEND

- APPROXIMATE PROPERTY BOUNDARY
- MW– MONITORING WELL
- MW– ABANDONED/DESTROYED MONITORING WELL
- SB– SOIL BORING LOCATION (ANTEA GROUP 2013/2014)
- HPB– SOIL BORING LOCATION (ANTEA GROUP 2012)
- B– BORING LOCATION
- T TELEPHONE
- SS SEWER
- W WATER
- ST STORM DRAIN
- E ELECTRIC
- G GAS
- SL STREET LIGHT
- FORMER PROPOSED SOIL BORING LOCATION
- PROPOSED SOIL BORING LOCATION

North

0 60

SCALE IN FEET

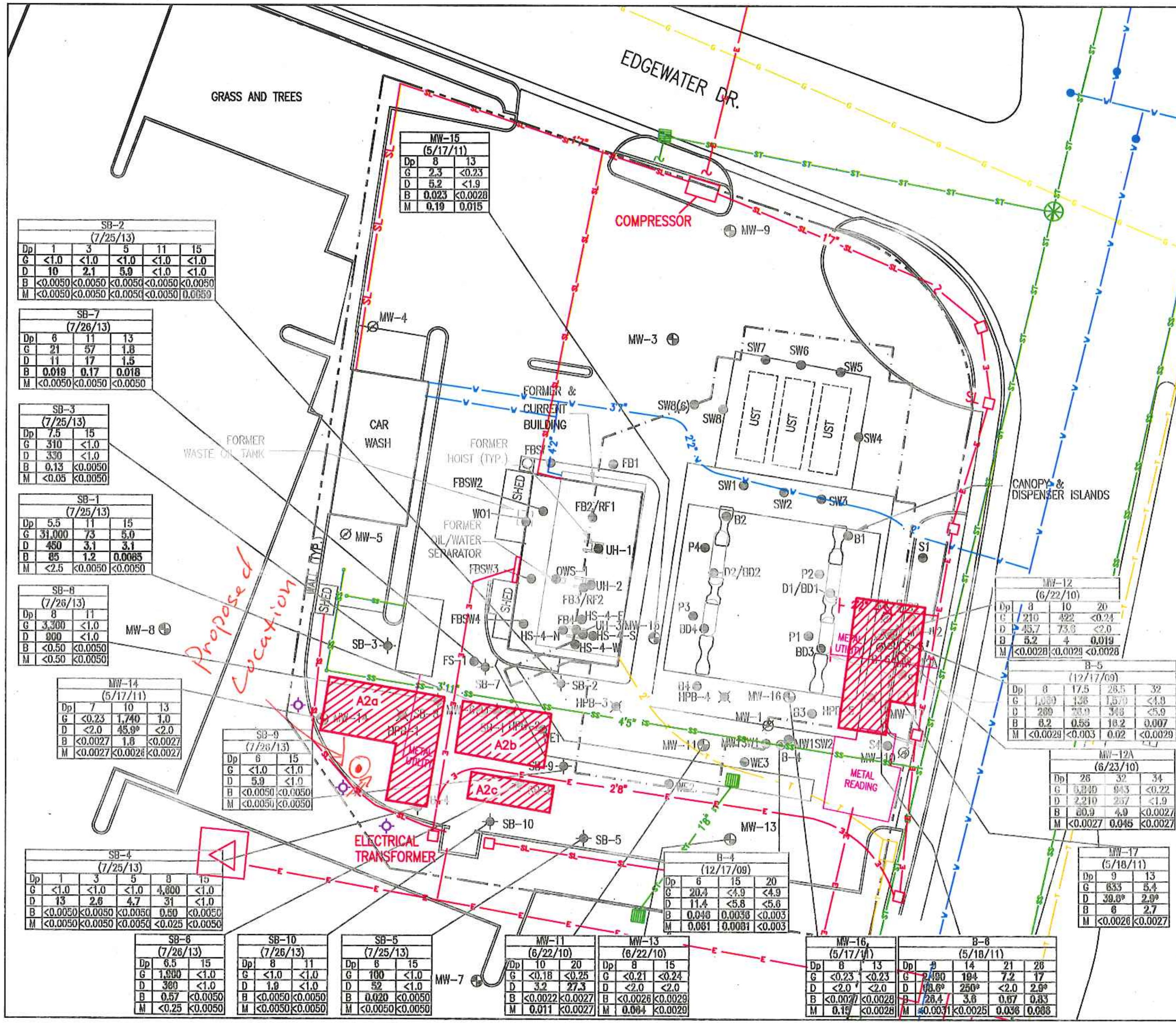
ADAPTED FROM A MORROW SURVEY ON 5/23/11

FIGURE 2
SITE PLAN WITH PROPOSED BORING LOCATIONS

76 STATION NO. 5191/5043
449 HEGENBERGER ROAD
OAKLAND, CALIFORNIA

PROJECT NO.	PREPARED BY	DRAWN BY
142705191	JF	JH
DATE	REVIEWED BY	FILE NAME
11/10/14	DD	5191-SiteS

antea group



SB-2 (7/25/13)					
Dp	1	3	5	11	15
G	<1.0	<1.0	<1.0	<1.0	<1.0
D	10	2.1	5.9	<1.0	<1.0
B	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
M	<0.0050	<0.0050	<0.0050	<0.0050	0.0059

SB-7 (7/26/13)			
Dp	6	11	13
G	21	57	1.8
D	11	17	1.5
B	0.019	0.17	0.018
M	<0.0050	<0.0050	<0.0050

SB-3 (7/25/13)		
Dp	7.5	15
G	310	<1.0
D	330	<1.0
B	0.13	<0.0050
M	<0.05	<0.0050

SB-1 (7/25/13)			
Dp	5.5	11	15
G	31,000	73	5.0
D	450	3.1	3.1
B	85	1.2	0.0085
M	<2.5	<0.0050	<0.0050

SB-8 (7/26/13)		
Dp	8	11
G	3,300	<1.0
D	800	<1.0
B	<0.50	<0.0050
M	<0.50	<0.0050

MW-14 (5/17/11)			
Dp	7	10	13
G	<0.23	1,740	1.0
D	<2.0	45.9*	<2.0
B	<0.0027	1.8	<0.0027
M	<0.0027	<0.0026	<0.0027

SB-9 (7/26/13)		
Dp	6	15
G	<1.0	<1.0
D	5.9	<1.0
B	<0.0050	<0.0050
M	<0.0050	<0.0050

SB-4 (7/25/13)					
Dp	1	3	5	8	15
G	<1.0	<1.0	<1.0	4,800	<1.0
D	13	2.6	4.7	31	<1.0
B	<0.0050	<0.0050	<0.0050	0.50	<0.0050
M	<0.0050	<0.0050	<0.0050	<0.025	<0.0050

SB-6 (7/26/13)		
Dp	6.5	15
G	1,800	<1.0
D	380	<1.0
B	0.57	<0.0050
M	<0.25	<0.0050

SB-10 (7/26/13)		
Dp	8	11
G	<1.0	<1.0
D	1.9	<1.0
B	<0.0050	<0.0050
M	<0.0050	<0.0050

SB-5 (7/25/13)		
Dp	6	15
G	100	<1.0
D	52	<1.0
B	0.020	<0.0050
M	<0.0050	<0.0050

MW-15 (5/17/11)		
Dp	8	13
G	2.3	<0.23
D	5.2	<1.9
B	0.023	<0.0028
M	0.19	0.015

B-4 (12/17/09)			
Dp	6	15	20
G	20.4	<4.9	<4.9
D	11.4	<5.8	<5.6
B	0.046	0.0038	<0.003
M	0.081	0.0081	<0.003

MW-11 (6/22/10)		
Dp	10	20
G	<0.18	<0.25
D	3.2	27.3
B	<0.0022	<0.0027
M	0.011	<0.0027

MW-13 (6/22/10)		
Dp	8	15
G	<0.21	<0.24
D	<2.0	<2.0
B	<0.0026	<0.0029
M	0.064	<0.0029

MW-16 (5/17/11)		
Dp	8	13
G	<0.23	<0.23
D	<2.0	<2.0
B	<0.0027	<0.0028
M	0.15	<0.0028

B-6 (5/18/11)				
Dp	9	14	21	26
G	2,490	194	7.2	17
D	68.6*	250*	<2.0	2.9*
B	28.4	3.6	0.67	0.83
M	<0.0031	<0.0025	0.036	0.068

MW-12 (6/22/10)			
Dp	8	10	20
G	210	422	<0.24
D	45.7	73.6	<2.0
B	5.2	4	0.019
M	<0.0028	<0.0029	<0.0028

B-5 (12/17/09)				
Dp	6	17.5	26.5	32
G	1,080	138	1,570	<4.8
D	289	28.9	348	<5.9
B	6.2	0.55	16.2	0.007
M	<0.0029	<0.003	0.02	<0.0029

MW-12A (6/23/10)			
Dp	26	32	34
G	5,840	943	<0.22
D	2,210	287	<1.9
B	80.9	4.9	<0.0027
M	<0.0027	0.045	<0.0027

MW-17 (5/18/11)		
Dp	9	13
G	633	5.4
D	39.6*	2.9*
B	6	2.7
M	<0.0026	<0.0027

LEGEND

- APPROXIMATE PROPERTY BOUNDARY
- MW- MONITORING WELL
- MW- DESTROYED MONITORING WELL
- SB- SOIL BORING LOCATION (ANTEA GROUP 2013/2014)
- HPB- SOIL BORING LOCATION (ANTEA GROUP 2012)
- B- BORING LOCATION
- SOIL SAMPLE LOCATION
- 1995 EXCAVATION AREA
- T — TELEPHONE
- SS — SEWER
- W — WATER
- ST — STORM DRAIN
- E — ELECTRIC
- G — GAS
- SL — STREET LIGHT

MW-12	SAMPLE NAME
(6/22/10)	SAMPLE DATE
Dp 8	DEPTH (FEET)
G 210	TOTAL PETROLEUM HYDROCARBONS AS GASOLINE
D 45.7	DIESEL RANGE ORGANICS WITH SILICA GEL
B 5.2	BENZENE
M <0.0028	METHYL TERTIARY BUTYL ETHER

NOTES:

NA = NOT ANALYZED
< = LESS THAN LABORATORY INDICATED REPORTING LIMITS
* = RESULT DID NOT MATCH LABORATORY STANDARD
BOLD = ABOVE LABORATORY DETECTED REPORTING LIMITS

ALL CONCENTRATIONS IN MILLIGRAMS PER KILOGRAM (mg/kg).

- PROPOSED EXCAVATION AREA
- PROPOSED SOIL BORING LOCATION

FIGURE 3

SITE PLAN WITH HISTORICAL SAMPLE LOCATIONS AND CONCENTRATIONS

76 STATION NO. 5191/5043
449 HEGENBERGER ROAD
OAKLAND, CALIFORNIA

PROJECT NO.	PREPARED BY	DRAWN BY
I42705191	EW	JH
DATE	REVIEWED BY	FILE NAME
6/24/15	DD	5191-SiteS

anteagroup