

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**  
AGENCY

COLLEEN CHAWLA, Director



DEPARTMENT OF ENVIRONMENTAL HEALTH  
LOCAL OVERSIGHT PROGRAM (LOP)  
For Hazardous Materials Releases  
1131 HARBOR BAY PARKWAY  
ALAMEDA, CA 94502  
(510) 567-6700  
FAX (510) 337-9335

January 29, 2018

Ms. Carryl MacLeod  
Chevron Environmental Management Co.  
6101 Bollinger Canyon Road  
San Ramon, CA 94583  
(Sent via electronic mail to:  
[CMacLeod@chevron.com](mailto:CMacLeod@chevron.com))

Mr. John Ratto  
Ratto Land Company  
P.O. Box 6104  
Oakland, CA 94603-0104

Ms. Vivian McIlraith  
Vivian L. McIlraith Trust  
407 Castello Road  
Lafayette, CA 94549

Subject: Extension Request Denial and Request for Data Gap Work Plan, Fuel Leak Case No. RO0000233 (Global ID # T0600100333), Chevron #9-4612, 3616 San Leandro Street, Oakland, 94601

Dear Mesdames MacLeod and McIlraith, and Mr. Ratto:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file for the above referenced site including the letter response entitled *Response to Case Closure Denial and Directive for Work Plan Addendum Submittal*, dated December 7, 2017. The response was submitted on your behalf by AECOM. The response requested an extension to the due date for the Work Plan Addendum due to a pending review of the case by the State Water Resources Control Board (SWB). The extension is denied for the reasons stated below in the Technical Comment section of this letter.

Implementation of site characterization at this site is important in order to be protective of human health and the environment and to move this case towards closure. Please note that as an identified Responsible Party, you are required by California Code of Regulations (Title 23, Division 3, Chapter 16, Article 11, §2720 through §2728) to characterize the site and implement any necessary corrective action.

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

### **TECHNICAL COMMENTS**

- 1. Work Plan Request** – ACDEH recognizes that the SWB will respond to the Request for Closure denial contained in the October 6, 2017 directive letter; however, as the lead agency ACDEH has been tasked by the SWB with moving all cases to closure in a consistent and timely manner. Therefore, in the interim until the SWB responds, ACDEH reaffirms the requirement for the requested work to proceed.

ACDEH notes that arguments for the appropriate hypothetical plume length that should be used to model the potential length of the groundwater plume are provided in the letter of response referenced above. In order to eliminate assumption errors, ACDEH requests the generation of a Data Gap Work Plan to delineate the plume in the field, and in an effort to limit the number of mobilizations, requests the inclusion of any other data gaps identified in AECOMs review of the case.

The identification of potential sensitive receptors within 1,000 feet of the confirmed plume is also requested. This is requested to include sensitive populations and wells, as well as basements and other dewatering structures due to the potential that these constructs may discharge contaminated groundwater to city streets as non-point source contamination, and to determine the risk for vapor intrusion into the downgradient subgrade structures due to the removal of a large portion of the separation distance from the surface to groundwater.

ACDEH requests the identified wells, sensitive populations, basements and other dewatering structures be located on a scaled figure incorporating an aerial photograph, with relevant data provided on a table similar to the depiction in Attachment 2, which is for a hypothetical plume.

ACDEH also notes a disagreement with respect to the adequacy of delineation of the vertical extent of soil contamination at the site. In an effort to define this, ACDEH requests that a minimum of one soil bore be proposed in the Data Gap Work Plan to address this. Due to the nature of the arguments, ACDEH requests close attention to the nature of groundwater at the site (confined or unconfined).

At this time the above-referenced site is not in compliance with ACDEH October 6, 2017 letter, which required the submittal of a Work Plan Addendum by December 8, 2017. Please submit a Data Gap Work Plan by the date identified below.

- 2. Naphthalene and Groundwater Monitoring** – Groundwater at the subject site was last monitored in June 2017. Please continue the semi-annual groundwater monitoring and sampling interval. To be consistent with the Low Threat Closure Policy, and to identify the potential for vapor intrusion relative to naphthalene downgradient of the site, ACDEH requests the inclusion of naphthalene in the groundwater monitoring analytical suite at all wells and future soil bores. As before, the frequency may be reduced pending a review of analytical results. Please submit the semi-annual report by the date requested below.

### **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 the specified file naming convention below, according to the following schedule:

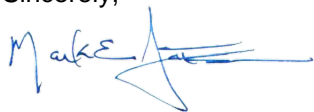
- **March 2, 2018** – Second 2017 Semi-Annual Groundwater Monitoring Report  
File to be named: RO233\_GWM\_R\_yyyy-mm-dd
- **March 9, 2018** – Data Gap Work Plan  
File to be named: RO233\_WP\_R\_yyyy-mm-dd

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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address is not listed on the first page of this letter, or in the list of cc's listed below, ACDEH is requesting your email address to help expedite communications and to help lower overall costs.

If you have any questions, please call me at (510) 567-6876 or send me an electronic mail message at [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org).

Sincerely,



Mark E. Detterman, PG, CEG  
Senior Hazardous Materials Specialist

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

Attachment 2 – Example Plume Length and Sensitive Receptor Map and Table

Mesdames MacLeod and McIlraith, and Mr. Ratto  
RO0000233  
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cc: Brenda Evans, AECOM, 1220 Avenida Acaso, Camarillo, CA 93012; (Sent via electronic mail to: [Brenda.Evans@aecom.com](mailto:Brenda.Evans@aecom.com))

Dana Fines, AECOM, 1220 Avenida Acaso, Camarillo, CA 93012; (Sent via electronic mail to: [Dana.Fines@aecom.com](mailto:Dana.Fines@aecom.com))

Dilan Roe, ACDEH; (Sent via electronic mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))

Paresh Khatri, ACDEH; (Sent via electronic mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org))

Mark Detterman, ACDEH; (Sent via electronic mail to: [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))

Electronic File, GeoTracker

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> December 14, 2017
	<b>ISSUE DATE:</b> July 25, 2012
	<b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016
<b>SECTION:</b> ACDEH Procedures	<b>SUBJECT:</b> Responsible Party(ies) Legal Requirements / Obligations

**REPORT & DELIVERABLE REQUESTS**

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO\_MAP, GEO\_XY, GEO\_Z, GEO\_BORE, GEO\_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/))

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values<sup>1</sup> as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

**GeoTracker Upload Table Example**

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
<b>2016 Subsurface Investigation Report</b>	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
<b>2012 Site Assessment Work Plan</b>	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>2010 GW Investigation Report</b>	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

<sup>1</sup> GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> NA
	<b>ISSUE DATE:</b> December 14, 2017
	<b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016
<b>SECTION:</b> ACDEH Procedures	<b>SUBJECT:</b> Responsible Party(ies) Legal Requirements / Obligations

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 the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

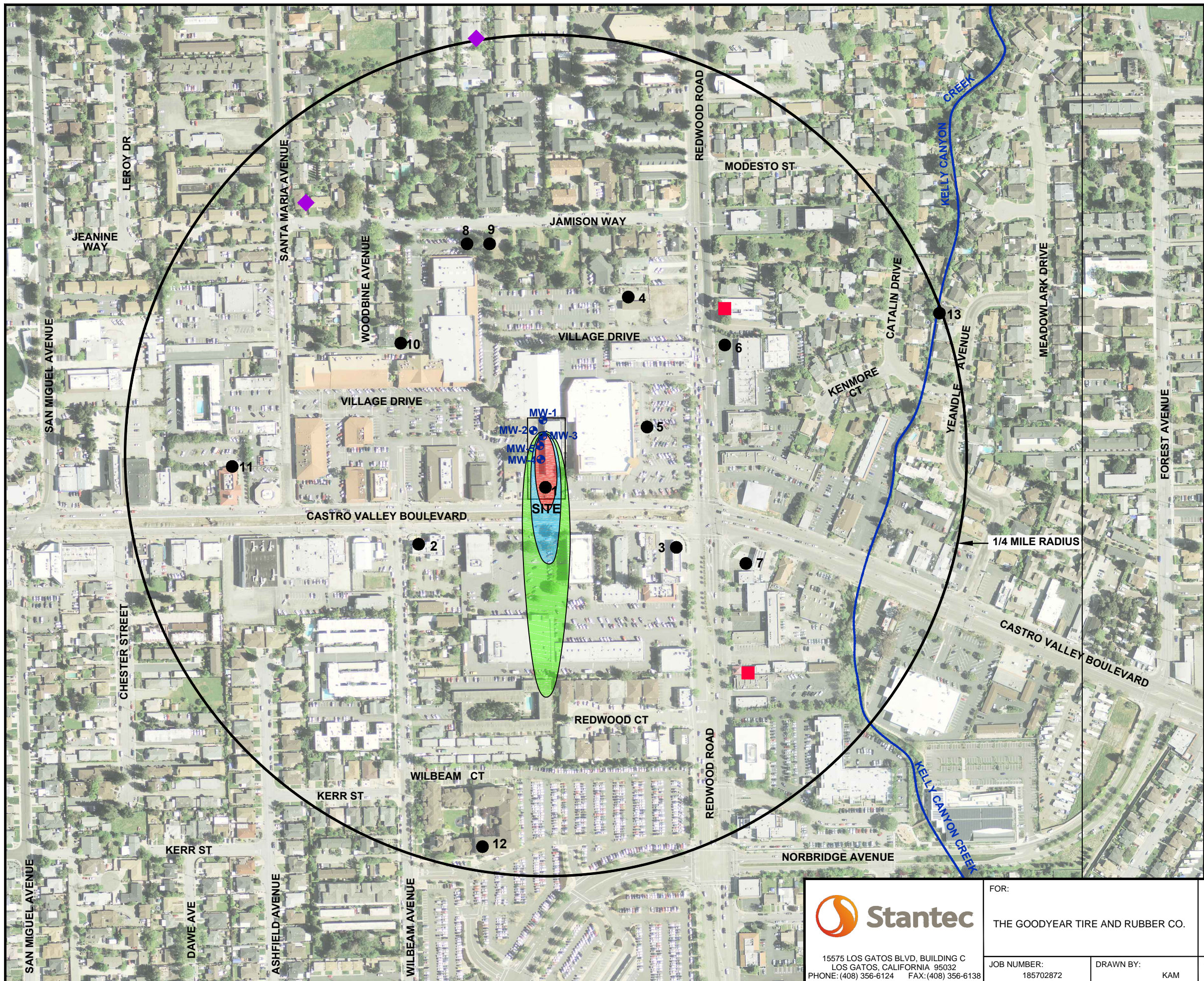
The California Business and Professions Code (Sections 6731, 6735, and 7835) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. 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

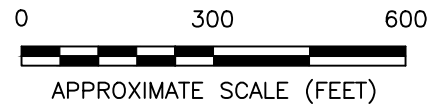
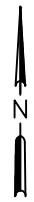
For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: [https://www.waterboards.ca.gov/water\\_issues/programs/ustcf/](https://www.waterboards.ca.gov/water_issues/programs/ustcf/)

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.



- LEGEND:**
- PROPERTIES WITH WELLS WITHIN 1/4-MILE OF SITE
  - MEDICAL OFFICES WITHIN 1/4-MILE OF SITE
  - ◆ SCHOOLS WITHIN 1/4-MILE OF SITE
  - ⊕ ACTIVE GROUNDWATER MONITORING WELL LOCATION
  - ⊗ DESTROYED GROUNDWATER MONITORING WELL LOCATION
  - ▭ AVERAGE PLUME LENGTH (100 ug/L)
  - ▭ 90TH PERCENTILE PLUME LENGTH (100 ug/L)
  - ▭ MAXIMUM PLUME LENGTH (100 ug/L)



**Stantec**  
 15575 LOS GATOS BLVD, BUILDING C  
 LOS GATOS, CALIFORNIA 95032  
 PHONE: (408) 356-6124 FAX: (408) 356-6138

FOR:  
 THE GOODYEAR TIRE AND RUBBER CO.

JOB NUMBER: 185702872  
 DRAWN BY: KAM

**POTENTIAL TPHg PLUME LENGTHS  
 BASED ON LTCP  
 TECHNICAL JUSTIFICATION  
 GOODYEAR DEX #9578  
 3430 CASTRO VALLEY BOULEVARD  
 CASTRO VALLEY, CALIFORNIA**

CHECKED BY: KM  
 APPROVED BY: GM

FIGURE:  
**12**

DATE:  
 01/08/15

**APPENDIX C**  
**Wells Survey Results**  
**Former Goodyear Tire Store**  
3430 Castro Valley Boulevard  
Castro Valley, CA

	Owner/Site Name	Well Type	Drill Date	Total Depth	Address	Approximate Distance/Direction From Site
1	Merritt Tire Sale	Monitoring Wells	Sept 94, Dec 96, Aug 12	16-20	3430 Castro Valley Blvd.	0
2	CHEVRON #9-4930 / VALLEY CAR WASH	Monitoring Well	Oct-93	20	3369 Castro Valley Blvd.	460 SW
3	Ted Simas (XTRA OIL DBA SHELL STATION)	Monitoring Wells	Feb 90 & Aug 97	18-20	3495 Castro Valley Blvd.	510 SE
4	R. T. Nahas Company (UNOCAL)	Monitoring Wells	Dec 89	25-30	20405 Redwood Rd.	520 NE
5	R. T. Nahas Company	Monitoring Wells	Apr 92	29-37	20629 Redwood Rd	310 E
6	Exxon Oil	Unknown	?	?	20450 Redwood Rd.	650 NE
7	BP #11105 / SHELL 17-1445	Monitoring Well	Sept 92, July 95, Aug 09,	15-30	3519 Castro Valley Blvd.	700 SE
8	R. T. Nahas Company	Domestic/Destroyed	Dec 75	56	3559 JAMISON WAY	700 NNW
9	R. T. Nahas Company	Destroyed	?	20 & 25	3533 JAMISON WAY	725 NNW
10	Horseshoe Drilling	Destroyed	Apr 96	20	20342 Woodbine Ave	600 NW
11	Mitzi Stockel	BOR/MON	Apr-90	8-23	3234 Castro Valley Blvd	1000 W
12	BART	Monitoring Well	Feb 93	16	21000 Wilbeam Ave.	1225 SSW
13	Robert D Rousey	Irrigation	May-77	28	20283 Yeandle Ave.	1325 ENE