



ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 LOCAL OVERSIGHT PROGRAM (LOP)
 For Hazardous Materials Releases
 1131 Harbor Bay Parkway
 Alameda, CA 94502-6577

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ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
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October 6, 2017

Ms. Carryl MacLeod
Chevron Environmental Management Co.
6101 Bollinger Canyon Road
San Ramon, CA 94583
(Sent via electronic mail to:
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: Response to Request for Closure, 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 report entitled *First Quarter 2017 Semi-Annual Groundwater Monitoring Report*, dated August 4, 2017, and the *Request for Case Closure*, (RFC) dated August 11, 2017. The reports were submitted on your behalf by Stantec Consulting Services, Inc. (Stantec). Thank you for the reports.

As you will recall, and as discussed in ACDEH's June 7, 2017 letter, the site has an atypical distribution of contamination, in that more elevated Photoionization Detector (PID) responses and odors are not at the groundwater interface at approximately 8 to 10 feet below grade surface (bgs), but at a depth of approximately 16 to 20 feet bgs. Deeper soils that documented elevated PID or odor responses have not been previously submitted for analytical testing. As a result of the data gap review, two downgradient soil bores were proposed in the *Site Conceptual Model and Data Gap Work Plan*, dated February 28, 2014, in order to collect grab groundwater samples to define the extent of groundwater contamination in a deep granular layer downgradient of the subject site, and ACDEH requested several modifications to the scope of work.

Attempts to place the two proposed soil bores have been hindered by the presence of a high pressure gas line across San Leandro Street, and a lack of progress in obtaining access to private property slightly further downgradient.

The previous directive letter dated June 7, 2017, ACDEH identified potential alternative methods to move the case towards closure. This included use of the Low Threat Closure Policy (LTCP) *Technical Justification for Groundwater Media-Specific Criteria* (State Water Board, April 24, 2012) to identify a search area for wells, surface water bodies, basements, and other potential sensitive receptors; the onsite investigation of apparently residual contamination at depth to obtain vertical soil contamination delineation; and the generation of a work plan addendum to incorporate all previously requested changes and potential changes to be identified and proposed.

In regards to the RFC, ACDEH has evaluated site data, in conjunction with the case files, to determine if the site is eligible for closure as a low risk site under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on ACDEH staff review, we have determined that the site fails to meet the Media-Specific Criteria for Groundwater (see Geotracker for an updated LTCP checklist).

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