

## Nowell, Keith, Env. Health

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**To:** TimBishop@chevron.com  
**Cc:** jim.harms@aecom.com; AFischer@Chevron.com; Roe, Dilan, Env. Health  
**Subject:** Fuel Leak Case RO251 Unocal #3538, 411 W. MacArthur Blvd, Oakland

Dear Mr. Bishop,

Thank you, Jim Harms of AECOM, and Alexis Fischer of Chevron Environmental Management Company (Chevron) for participating in the meeting on January 30, 2014 regarding fuel leak case for Unocal #3538, 411 W. MacArthur Blvd, Oakland, Alameda County Environmental Health (ACEH) case number RO0000251. The purpose of the meeting was to discuss the status of the case and identify action items to move the case forward toward closure, including a discussion of the report *Response to Technical Comments* (RTC) dated September 13, 2013 and prepared by AECOM for the subject site. The RTC presented a Site Conceptual Model (SCM) and identified data gaps. ACEH acknowledged the case may be a candidate for closure in the near future under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) provided concerns regarding the contaminant plume length are addressed.

The LTCP Media-Specific Criteria for Groundwater includes criteria for plume length that exceeds Water Quality Objectives (WQOs), for distance from the leading edge of the plume to the nearest supply well, and for distance from the leading edge of the plume to the nearest surface water body. It is ACEH's opinion that the risk to sensitive receptors from contaminated groundwater cannot be evaluated until the leading edge of the plume has been identified, and the vertical delineation of the plume established.

The RTC report presented the following data gaps:

1. Well survey was incomplete as it did not include a review of the Alameda County Public Works (ACPW) database. To address this data gap AECOM proposes a well survey that includes a search of the ACWD database;
2. The down gradient contaminant plume has not been delineated either vertically or horizontally. AECOM proposes installing groundwater monitoring wells at two locations. Each well location would consist of a nested pair of wells, one screened at 17 to 20 feet below the ground surface (bgs) and the other screened at 27 to 30 feet bgs.
3. On-site conditions are not known as the former fueling station site has most recently been used for vehicle storage. AECOM proposes a visual inspection of the former fueling station in order to view the site for hydraulic hoists and evaluate the site for additional sources for impacts.

ACEH is in general concurrence with proposed actions presented in the RTC provided the following technical comments are addressed.

### Technical Comments

- A. Beneficial Use Wells – Conduct a well search that includes a review of the ACPW database (in-progress).
- B. Contaminant Plume Length — As discussed in the meeting, ACEH recommends that hydropunch grab groundwater samples be recovered instead of the installation of groundwater monitoring wells. ACEH also recommends the hydropunch locations be farther down gradient than the locations for the proposed wells. Based on the increased distance between the site and the hydropunch locations, ACEH recommends construction of a transect consisting of more than two hydropunch points. As groundwater contamination beneath the site has been documented at 29 feet bgs, depth discrete groundwater samples should include intervals deep enough to provide a vertical plume delineation at each sample location. As discussed in the meeting please prepare a draft figure showing the hydropunch locations on aerial photographic base maps with a rose diagram.
- C. On Site Conditions — Please perform the on-site visual inspection in order to view the site for hydraulic hoists and evaluate the site for additional sources for impacts.

## Technical Report Request

Please provide ACEH (Attention: Keith Nowell), the draft figure depicting proposed hydropunch locations. After review and approval of the draft figure by ACEH, please prepare a work plan for the groundwater investigation. Please submit the following requested documents by the dates specified below. Finalized technical reports should be uploaded 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:

- **February 28, 2014 – Draft Figure Depicting Proposed Hydropunch Locations**
- **To Be Determined – Groundwater Investigation Work Plan** (file name: RO0000251\_WP\_R\_yyyy-mm-dd)

Thank you for your cooperation. ACEH looks forward to working with you and your consultant to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org).

Respectfully,

Keith Nowell

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