From:	Nowell, Keith, Env. Health
To:	"Nicole.Arceneaux@chevron.com"
Cc:	Alexis Coulter (ACoulter@Chevron.com); Jim Harms (jim.harms@aecom.com); Roe, Dilan, Env. Health
Subject:	Fuel Leak Case RO253 Unocal #5781, 3535 Pierson St., Oakland
Date:	Thursday, January 08, 2015 9:15:00 AM

Dear Ms. Arceneaux:

Alameda County Environmental Health (ACEH) has reviewed the document *Data Gap Investigation Work Plan* (Work Plan) dated December 23, 2014 and prepared by AECOM for the subject site. This report has only been submitted to Geotracker and has not been submitted to the County. Please additionally submit an electronic copy to ACEH.

The Work Plan addresses many of ACEH's technical comments presented during a meeting held on August 4, 2014.

Based on ACEH staff review of the referenced document and of the case file, we generally concur with the recently proposed scope of work, provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. While the comments below request a number of additional analyses, 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. We request that you address the following technical comments and send us the technical reports requested below. Please provide 72-hour advance written notification to this office (e-mail preferred to: keith.nowell@acgov.org) prior to the start of field activities.

Technical Comments:

AECOM proposed scope of work:

1. First Generation Waste Oil Tank Assessment- The proposed work included the collection of soil samples at intervals of 2, 5, and 10 feet below the ground surface (bgs) from three borings.

   ACEH requests that one soil sample be recovered from each soil bore in the 0- to 5-feet bgs and the 5- to 10 feet bgs intervals. Soil samples should also be recovered at areas of obvious contamination, the soil/groundwater interface, and at significant changes in lithology. The samples recovered are requested to be collected from at least two different depths within the 0- to 5-foot and from the 5- to 10 foot intervals in addition to the top of the soil/groundwater interface. If staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number of soil samples from this interval should be submitted for laboratory analyses to characterize the fuel hydrocarbon concentrations within this interval. Please ensure that the analytical results define the vertical and horizontal extent of TPH impacts at the site.

   As discussed in the meeting, ACEH is of the opinion that EB1 and EB2 groundwater samples may have been diluted as the depth of the recovered samples is significantly deeper than the depth to water reported for the site. Groundwater at the site ranges from 10.53 feet below the ground surface (bgs) to 19.55 feet bgs, but is typically in the range of 11 feet bgs to 16 feet bgs. ACEH requests that the soil boings associated with the waste oil tank investigation be advanced to a depth sufficient to collect grab groundwater samples. Please analyze grab groundwater samples for total petroleum hydrocarbons (TPH) as gasoline (TPHg) , TPH as diesel (TPHd), TPH as motor oil (TPHmo), benzene, toluene, ethylbenzene, and xylenes (BTEX), methyl tertiary butyl ether (MTBE), the full suite of volatile organic compounds (VOCs), and semi-volatile organic compounds (SVOCs).

2. Down Gradient Soil and Groundwater Assessment- The proposed work included the collection of soil samples at 5-foot intervals beginning at 5 feet bgs. The Work Plan does not specifically address if the soil samples will be submitted to an analytical laboratory for analysis.

ACEH requests that one soil sample be recovered from each soil bore in the 0- to 5-feet bgs and the 5- to 10 feet bgs intervals, at areas of obvious contamination, the soil/groundwater interface, and at significant changes in lithology. The samples recovered are requested to be collected from at least two different depths within the 0- to 5-foot and from the 5- to 10 foot intervals in addition to the top of the soil/groundwater interface. If staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number of soil samples from this interval should be submitted for laboratory analyses to characterize the fuel hydrocarbon concentrations within this interval. Please ensure that the analytical results define the vertical and horizontal extent of TPH impacts at the site. Analyze the soil samples for TPHg, TPHd, TPHmo, BTEX, and MTBE.

Please analyze grab groundwater samples for TPHg, TPHd, TPHmo, BTEX, and MTBE.

3. Sample Analysis- The proposed scope of analysis for all samples included TPHg, TPHd, and total oil and grease (TOG) analysis using United States Environmental Protection Agency (EPA) test method 8015.

As discussed above, please substitute the TOG analysis with the analysis for motor oil (TPHmo) by EPA method 8015.

4. Reporting- As discussed in the meeting, please include a figure using an aerial photographic base showing the existing and currently proposed boring and groundwater sampling point locations and the nearby Julia Morgan School for Girls.

Please electronically submit the report summarizing the investigation results to both the ACEH ftp and the GeoTracker websites. In addition to the report document, the electronic submittal of information (ESI) to GeoTracker should also include individual files for lab data in Electronic Deliverable Format (EDF) and a GEOMAP.

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 by the schedule identified below:

- **May 7, 2015 – Soil and Groundwater Investigation** (file name: RO0000253_SWI_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.

Thank you for your cooperation. ACEH looks forward to working with you and your consultants 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.

Respectfully,
Keith Nowell

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