



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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August 15, 2011

Mr. David Patton
Chevron Corporation
6111 Bollinger Canyon Road, Rm 3660
San Ramon, CA

Mr. Mark Hom and Anna Cheng
3135 Gibbons Drive
Alameda, CA, 94501-1749

JL and Jane Bolton
Address Unknown

(sent via electronic mail to acosta@chevron.com)

Subject: Modified Work Plan Approval; Fuel Leak Case No. RO0000341; (Global ID # T0600100330);
Chevron #9-1153, (3126 Fernside Blvd), 3135 Gibbons Drive, Alameda, CA 94501

Dear Messrs. Patton and Hom, Ms. Cheng:

Alameda County Environmental Health Department (ACEH) staff has reviewed the case file, the *First Quarter 2011 Groundwater Monitoring and Sampling Report*, dated May 2, 2011 and the *Work Plan for Subsurface and Ambient Air Investigation*, dated June 10, 2011. Both reports prepared and submitted by Conestoga-Rovers & Associates (CRA) on your behalf. Thank you for submitting the reports, they help move the site investigation forward. The work plan proposes the installation of seven hand auger soil bores to help fill a data gap in previous soil collection methodologies, and also proposes the collection of one crawl space, one indoor air, and one outdoor air sample. The crawl space sample will be compared with the indoor and outdoor samples to help clarify the extent of vapor intrusion in to the residential home, if any.

ACEH is in general agreement with the work plan; however, requests a work plan addendum to clarify several concerns prior to implementation. Consequently, we request that you address the following technical comments, send the requested document, perform the proposed work, and send us the technical reports requested below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- 1. Vapor Intrusion Sampling** – The work plan proposes the collection of one sample in three locations as outlined above; however, because of site logistics (difficulty in accessing for UST excavation locations currently situated beneath the residential home) ACEH is not certain that one sample in the crawl space area will generate a representative sampling event. As a consequence, ACEH requests the collection of two crawl space vapor samples in an attempt to provide additional data to allow a better judgment of crawl space vapors. Collection of the crawl space samples should be positively biased to be collected vertically over the location of the former UST locations beneath the house. For similar reasons, ACEH is also uncertain that one indoor air sample will be adequate to understand the indoor air environment (due to common use of petrochemicals in consumer products). As a consequence, ACEH requests the collection of two indoor air samples, one in a worst-case and one in a best-case location. ACEH is in general agreement that one onsite outdoor air sample should adequately characterize the onsite outdoor air. By the date identified below, please convey to ACEH the proposed sample locations for each area with a rationale of the sample selection criteria. Please include in this information the location of the crawl space access door.
- 2. UST Backfill Soil Sampling** – Seven hand augered soil bores are proposed for installation to further investigate residual soil contamination in and in proximity to the former UST locations for reasons expanded on the previous directive letter dated March 3, 2011. ACEH is concerned sample collection, as proposed,

from a hand auger "bucket" will not allow the collection of representative samples; please utilize a slide hammer with a soil core sampler to ensure collection of representative soil samples. With respect to the analytical suite proposed for soil samples, please additionally submit samples for EDB and EDC; and TPHd and TPHmo (or a fingerprint analysis) due to the former presence of a waste oil UST at the site, and the apparent non-discriminate backfilling techniques. Finally, by the date identified below please convey to ACEH the location of the crawl space access door. If appropriately placed, please utilize this location to install an additional soil bore beneath the house through or in proximity to a former UST location.

To help ease communications, both technical comment responses can be brief.

- 3. Groundwater Analytical Suite** – Review of submitted groundwater monitoring reports and of the December 30, 2010, *Feasibility Study and Corrective Action Plan*, appears to indicate that EDB and EDC have not been previously analyzed for at the site. If this is incorrect, please forward the location of this data. Otherwise, please incorporate analysis for EDB and EDC in the next groundwater monitoring and sampling effort, and thereafter analyze the appropriateness of further analysis.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Mark Detterman), according to the following schedule:

- **September 9, 2011** – Work Plan Addendum (sample and crawl space locations)
- **November 14, 2011** – Subsurface Investigation and Vapor Survey Report

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.

Should you have any questions, please contact me at (510) 567-6876 or send me an electronic mail message at 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

cc: Nathan Lee, Conestoga-Rovers & Assoc., 5900 Hollis Street, Suite A, Emeryville, CA 94608
(sent via electronic mail to NLee@croworld.com)

Donna Drogos (sent via electronic mail to donna.drogos@acgov.org)
Mark Detterman (sent via electronic mail to mark.detterman@acgov.org)
Case Electronic File, GeoTracker

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: July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 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.