



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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December 16, 2014

Ms. Alexis Coulter
Chevron Environmental Management Co.
6101 Bollinger Canyon Road
San Ramon, CA 94583
(sent via electronic mail to
acoulter@chevron.com)

Mr. Mark Hom and Anna Cheng
3135 Gibbons Drive
Alameda, CA, 94501-1749
(sent via electronic mail to
mark@galvinhom.com)

JL and Jane Bolton
Address Unknown

John Thompson Shirley & Ruben Cohen
Address Unknown Address Unknown

Gary & Jerri Fenstermaker
Address Unknown

Claire Cepollina & Fred Martini
Address Unknown

Subject: Request for IRAP Addendum, Data Gap Work Plan, and Updated Draft Feasibility Study / Corrective Action Plan; Fuel Leak Case No. RO0000341; (Global ID # T0600100330); Chevron #9-1153, (3126 Fernside Blvd), 3135 Gibbons Drive, Alameda, CA 94501

Dear Ms. Fischer, Mr. Hom, and Ms. Cheng:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Vapor Mitigation Plan*, dated October 3, 2014, and the *Third Quarter 2014 Groundwater Monitoring and Sampling Report*, dated November 21, 2014. Both reports were prepared and submitted on your behalf by Conestoga-Rovers & Associates (CRA). Thank you for the submittal of the reports.

To further discuss the proposed work and refine the path forward at the site, ACEH requested a meeting with you and CRA, and met on December 11, 2014. Based on the review of the case file and the results of the meeting, ACEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

1. Interim Remedial Action Plan Addendum - The Interim Remedial Action Plan (IRAP) proposes to mitigate vapor intrusion with the use of the Retro-Coat™ barrier by Land Science Technologies in order to seal the concert garage floor from subsurface vapors. Because the process requires the filling of slab cracks and the destruction of existing vapor wells, collection of subslab vapors will not be possible after use of the product. As discussed at the meeting, Land Science created the product to mitigate vapor intrusion of Tetrachloroethene (PCE) and Trichloroethene (TCE) through concrete, and has not specifically evaluated the product against vapor intrusion of petroleum hydrocarbon compounds (especially benzene, toluene, ethylbenzene, total xylenes, and etc.). However, CRA has indicated that Land Science Technologies has stated that the product is expected to similarly block petroleum hydrocarbon volatile compounds based on the chemical properties of the compounds.

ACEH is in general agreement with the proposed use of the product as a mitigation tool; however, requests a Construction Quality Assurance (CQA) Plan (as a IRAP Addendum) by the date identified below. The CQA Plan is intended to guide construction of the barrier in order to ensure the installation of the product is to the manufacture's specifications.

2. Data Gap Work Plan – As discussed in the December 11, 2014 meeting, a data gap work plan is required to fill Low Threat Closure Policy (LTCP) data gaps remaining at the site, including those identified in the July 10, 2014 Site Conceptual Model, and those identified in the meeting, including but not limited to:

- **Extent of Free Phase** – To determine if Free Phase (FP) extends offsite with the installation of a well in the vicinity of the existing unused recovery trench. The recovery trench and well RW-1 were discussed in the meeting, and it was agreed are not capable of filling this data gap.
- **Naphthalene and PAH Analytical Data** – A waste oil underground storage tank (UST) was removed from the subject site and analysis for naphthalene and poly-aromatic hydrocarbons (PAHs) have not been conducted in accordance with the LTCP policy. Analysis for naphthalene has additionally not been conducted in association with the former gasoline USTs at the site.

Please submit a work plan by the date identified below. This request can be combined with pilot studies required for the next technical comment.

3. **Updated Draft Feasibility Study / Corrective Action Plan** - As additionally discussed in the December 11, 2014 meeting and several previous letters (March 24, 2014 and August 29, 2014), an updated draft Feasibility Study / Corrective Action Plan (FS/CAP) is requested to address corrective actions required at the site due to the inability of the site to meet the Vapor Intrusion to Indoor Air and the Direct Contact and Outdoor Air Exposure criteria. Please submit a draft FS/CAP by the date identified below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH 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:

- **February 16, 2015** – Construction Quality Assurance Plan
File to be named: RO341_IRAP_ADEND_R_YYYY-MM-DD
- **March 16, 2015** – Data Gap Work Plan
File to be named: RO341_WP_R_YYYY-MM-DD
- **March 16, 2015** – Draft FS/CAP (If appropriate, the Work Plan be combined with the draft FS/CAP)
File to be named: RO341_FEASSTUD_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 you have any questions, please call 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: N. Scott MacLeod, Conestoga-Rovers & Assoc., 5900 Hollis Street, Suite A, Emeryville, CA 94608
(sent via electronic mail to smacleod@croworld.com)
Nathan Lee, Conestoga-Rovers & Assoc., 5900 Hollis Street, Suite A, Emeryville, CA 94608
(sent via electronic mail to nlee@croworld.com)

Dilan Roe, ACEH (sent via electronic mail to dilan.roe@acgov.org)
Mark Detterman, ACEH (sent via electronic mail to mark.detterman@acgov.org)
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: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 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.