Nowell, Keith, Env. Health

From: Nowell, Keith, Env. Health
Sent: Friday, July 25, 2014 9:07 AM
To: Jillian Holloway (JillianHolloway@chevron.com)
Cc: 'Alexis Fischer'; 'Jim Harms'; Roe, Dilan, Env. Health
Subject: Fuel Leak Case RO0000352 – Unocal #5484, 18950 Lake Chabot Rd., Castro Valley, CA 94546

Dear Ms. Holloway,

Thank you and Alexis Fischer of Chevron Environmental Management Company and Jim Harms of AECOM for participating in the meeting on July 22, 2014 regarding fuel leak case for Unocal #5484, 18950 Lake Chabot Rd., Castro Valley, CA, Alameda County Environmental Health (ACEH) case number RO00000352. The purpose of the meeting was to discuss the status of the case and identify action items to move the case forward toward closure under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP), including a discussion of the draft Focused Site Conceptual Model (SCM) dated July 21, 2014 and prepared by AECOM for the subject site.

In its May 30, 2014 Directive, ACEH expressed its opinion that the case does not meet the LTCP General Criteria e (Site Conceptual Model); the Media Specific Groundwater criteria for plume length, distance to the nearest surface water body from the plume boundary and distance to the nearest supply well from the plume boundary; Media Specific Vapor Intrusion to Indoor Air; and the Media Specific Direct Contact and Outdoor Air Exposure. The draft SCM discussed at the meeting addressed these items.

As agreed upon in the meeting, additional evaluation is required in order to assess data gaps and risk associated with shallow groundwater.

- Identification of all sensitive receptors identified within 2,000 feet, including foundation types, wells and surface water bodies.

- Evaluation of depth to water in wells and correlation to vadose zone thickness and the effect of shallow bedrock beneath the site on the depth to groundwater.

- Expanded trend analysis for naphthalene in groundwater monitoring well MW-7 to include all repeated spikes in concentration over time, ranging to 130 micrograms per liter (μg/L) on March 3, 1994, 120 μg/L on March 1, 1995, and 150 μg/L on January 13, 2010. Please include all historical naphthalene concentration data for the concentration trend graph for groundwater monitoring well MW-7.

- Resume analyzing for diesel in well MW-7 for future groundwater monitoring events.

- There is the potential of naphthalene vapor intrusion risk due to shallow groundwater (shallowest reported as less than 3 feet bgs). Due to the uncertainty in depth of the vadose zone, the use of Environmental Screening Levels (ESLs) for groundwater to vapor intrusion are not appropriate (i.e. requires depth to water greater than 10 feet). Therefore, please recover soil gas samples from two on site locations; one near the waste oil tank pit, the suspected source area, and one near the property boundary down gradient of the pit.

- Naphthalene was not an analyte in the analysis suite for the former waste oil tank; however, naphthalene concentrations are observed in groundwater from well MW-7 indicating the former waste oil tank location is a source of naphthalene. Please recover soil samples near the waste oil tank pit from within the upper five feet and from the interval of five- to 10 feet below the ground surface to evaluate against the LTCP Direct Contact criterial.

Please address the aforementioned technical comments and submit the reports by the dates specified below:

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 schedule below. Please provide ACEH (Attention: Keith Nowell), the draft figure depicting proposed hydropunch and temporary well locations. After review and approval of the draft figure by ACEH, please prepare a work plan for the soil and groundwater investigations.

- **August 28, 2014 – Updated Site Conceptual Model** (file name: RO0000352_SCM_R_yyyy-mm-dd)
- **August 28, 2014 – Soil, Groundwater and Soil Gas Investigation Work Plan** (file name: RO0000352_WP_R_yyyy-mm-dd)

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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PDF copies of case files can be reviewed/downloaded at:

http://www.acgov.org/aceh/lop/ust.htm