

## Nowell, Keith, Env. Health

---

**From:** Nowell, Keith, Env. Health  
**Sent:** Wednesday, August 13, 2014 12:15 PM  
**To:** 'Holloway, Jillian R'  
**Cc:** Fischer, Alexis N; 'Jim Harms'; Roe, Dilan, Env. Health  
**Subject:** RE: Fuel Leak Case RO0000352 - Unocal #5484, 18950 Lake Chabot Rd., Castro Valley, CA 94546

Jillian,

Thank you for providing Alameda County Environmental Health (ACEH) the schedule for performing the soil gas investigation. ACEH looks forward to reviewing the results of the investigation and approves the extension request for report submittal to September 12, 2014.

As indicated in ACEH's Directive dated July 25, 2014, diesel has been identified as a potential chemical of concern at the subject site. Until ACEH has had an opportunity to review the updated Site Conceptual Model, which will identify all sensitive receptors identified within 2,000 feet, including foundation types, wells and surface water bodies, ACEH requests that groundwater monitoring continue on its current schedule.

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](mailto:keith.nowell@acgov.org).

Respectfully,  
Keith Nowell

Keith Nowell PG, CHG  
Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6540  
phone: 510 / 567 - 6764  
fax: 510 / 337 - 9335  
email: keith.nowell@acgov.org

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

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

---

**From:** Holloway, Jillian R [mailto:JillianHolloway@chevron.com]  
**Sent:** Tuesday, August 12, 2014 4:18 PM  
**To:** Nowell, Keith, Env. Health  
**Cc:** Fischer, Alexis N; 'Jim Harms'; Roe, Dilan, Env. Health  
**Subject:** RE: Fuel Leak Case RO0000352 - Unocal #5484, 18950 Lake Chabot Rd., Castro Valley, CA 94546

Hi Keith and Dilan,

I wanted to send you an update on the schedule for the soil gas sampling:

Work Plan- August 15

Installation- August 20  
Sampling- August 26  
Final Report- September 12

We have put a rush on the soil and vapor samples so we should receive those by September 1. If you would like to see the results before we submit the formal report please let us know and we can send those to you as soon as we receive them.

I also wanted to follow-up on my email sent July 29, 2014 requesting clarification on the item "Resume analyzing for diesel in well MW-7 for future groundwater monitoring events." It was our impression that the presentation of the maximum groundwater plume length with the additional 1,000 foot buffer supported the cessation of groundwater monitoring at the site. The intent to cease groundwater monitoring was communicated in the 2/24/14 email after the SCM and Case Closure Summary were submitted.

Please let me know if you have any comments or concerns.

Thanks,

**Jillian Holloway**  
Project Manager

**Chevron Environmental Management Company**

6101 Bollinger Canyon Road, 5338B  
San Ramon, CA 94583  
Office: (925) 790-3513  
Mobile: (510) 359-0261  
[jillianholloway@chevron.com](mailto:jillianholloway@chevron.com)

---

**From:** Holloway, Jillian R  
**Sent:** Tuesday, July 29, 2014 3:34 PM  
**To:** 'Nowell, Keith, Env. Health'  
**Cc:** Fischer, Alexis N; 'Jim Harms'; Roe, Dilan, Env. Health  
**Subject:** RE: Fuel Leak Case RO0000352 - Unocal #5484, 18950 Lake Chabot Rd., Castro Valley, CA 94546

Dear Mr. Nowell,

I appreciate the time and effort ACEH has spent working with us on moving towards closure on this site. I did want to clarify one of the items below. You mentioned "Resume analyzing for diesel in well MW-7 for future groundwater monitoring events". It was our impression that the presentation of the maximum groundwater plume length with the additional 1,000 foot buffer supported the cessation of groundwater monitoring at the site. The intent to cease groundwater monitoring was communicated in the 2/24/14 email after the SCM and Case Closure Summary were submitted.

AECOM looked into the location of Chabot Creek and the one water supply well with the questionable location information.

The closest section of Chabot Creek is over one-mile to the south. There are noted drained or buried sections of Chabot Creek to the east and west of the site within 1,000 feet. There is a noted length of greater than 24" culvert or storm drain that is approximately 750 feet downgradient of the site to the southwest, it connects to an engineered channel and then finally to Chabot Creek, information was taken from the Creek and Watershed Map of Hayward & San Leandro, 2011. The entire length of Chabot Creek that is downgradient of the site is in a culvert. In the unlikely event that groundwater from the site is entering the culvert, the site maximum concentration of benzene and MTBE are below the aquatic receptor ESL. The concentration of naphthalene in MW-7 exceeds the aquatic receptor ESL (24 ug/L), MW-2 and MW-5 are further from the source area (though not directly downgradient of MW-7 at all times) and have always been non-detect for naphthalene.

ACPW responded that the well in question was over 1/2 mile away.

Thanks,

Jill

**Jillian Holloway**  
Project Manager

**Chevron Environmental Management Company**

6101 Bollinger Canyon Road, 5338B

San Ramon, CA 94583

Office: (925) 790-3513

Mobile: (510) 359-0261

[JillianHolloway@chevron.com](mailto:JillianHolloway@chevron.com)

---

**From:** Nowell, Keith, Env. Health [<mailto:Keith.Nowell@acgov.org>]

**Sent:** Friday, July 25, 2014 9:07 AM

**To:** Holloway, Jillian R

**Cc:** Fischer, Alexis N; '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 ( $\mu\text{g/L}$ ) on March 3, 1994, 120  $\mu\text{g/L}$  on March 1, 1995, and 150  $\mu\text{g/L}$  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 criterion.

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](mailto:keith.nowell@acgov.org).

Respectfully,  
Keith Nowell

Keith Nowell PG, CHG  
Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6540  
phone: 510 / 567 - 6764  
fax: 510 / 337 - 9335  
email: [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org)

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

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