

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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March 27, 2009

Mr. Terry Grayson
ConocoPhillips Company
76 Broadway
Sacramento, CA 95818

De L Liu and Na Li
922 Saddlehorn Court
Danville, CA 94506

Mr. Henry O. Armour
P.O. Box 2527
Olympia, WA 98507

CD & PWS Enterprises, Inc.
8998 Alcosta Boulevard
San Ramon, CA 94583

Subject: Fuel Leak Case No. RO0000361 and Geotracker Global ID T0600100101, Unocal #7376, 4191 First Street, Pleasanton, CA 94566 – Work Plan Approval

Dear Mr. Grayson:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the most recent document entitled, "*Work Plan for Replacement of Wells 1, 2B and 3, 76 Service Station #7376, RO# 361, 4191 First Street, Pleasanton, CA,*" dated February 27, 2009. The Work Plan was prepared on behalf of ConocoPhillips by Delta Environmental. The Work Plan proposes decommissioning of existing long-screen wells MW-1, MW-2B, and MW-3 and installation of wells MW-1A, MW-1B, MW-2C, MW-2D, MW-3A, and MW-3B.

In correspondence dated July 30, 2008, ACEH requested that ConocoPhillips submit a Pilot Test Work Plan or Draft Corrective Action Plan by September 28, 2008 to begin site cleanup. Based on schedule extension requests from ConocoPhillips, the schedule for submittal of a Pilot Test Work Plan or Draft Corrective Action Plan was extended to March 1, 2009. On February 9, 2009 Jerry Wickham of ACEH met with Terry Grayson representing ConocoPhillips and John Reay of Delta Environmental regarding future work at the site. During the meeting, decommissioning of long-screen wells and installation of wells with appropriate screen intervals was discussed in order to acquire additional information on hydraulic gradient and the lateral and vertical extent of groundwater contamination. This information is to be used in planning and implementing site cleanup.

The proposed scope of work for well installation and sampling is generally acceptable provided that the modifications requested in the technical comments below are addressed and incorporated during the field investigation. 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 also incorporate the additional investigation described in technical comment 1 in the area of a former Bunker fuel tank.

We request that you address the technical comments below, perform the proposed work, and send us the reports requested below.

TECHNICAL COMMENTS

- 1. Former Bunker Fuel Tank.** In correspondence dated March 21, 2008 and July 30, 2008, we requested that you review the relevant investigation data regarding the former bunker fuel tank and propose investigation activities to evaluate whether a tank may still be in place and whether long chain hydrocarbon contamination is present near the former location of the bunker fuel tank. During the February 9, 2009 meeting, Delta Environmental provided a map entitled, "Site Plan with 1907 Sanborn Map." The map showed the projected location of a former bunker fuel tank based on a 1907 Sanborn map. On the map provided by Delta Environmental, the projected location of the former bunker tank is approximately 10 to 15 feet northwest of the northern boundary of the site. However, a linear feature taken from the Sanborn map that appears to be the property boundary is offset approximately 10 feet northwest from the current property boundary. If the map locations of the property boundaries are shifted back to be coincident, the former location of the bunker fuel tank appears to be along the northern boundary of the site, roughly 10 feet north of boring CP-1. Elevated concentrations of TPH as diesel were detected in soil samples collected from boring CP-1. However, no analyses for hydrocarbons in the fractions heavier than TPH as diesel were performed on the soil samples from CP-1. In order to evaluate the detections of heavier hydrocarbons in shallow soil in this area, we request that you advance one soil boring to a depth of 40 feet bgs at a location approximately 10 feet north of CP-1 along the property boundary. Prior to advancing the boring, we request that you perform a geophysical survey to verify that the tank is no longer present. The soil boring is to be sampled continuously in the field for logging and screening as the boring is advanced. Field screening is to be conducted by a qualified field geologist using visual observations, odor, and measurements using a field photoionization detector (PID) fitted with an appropriate lamp and calibrated for the chemicals of concern. Soil samples are to be extracted from the continuous cores at frequent intervals and placed in sealed jars or plastic bags for measurement and recording of VOC concentrations in the headspace using the PID. Soil samples are to be collected for laboratory analysis from zones where visible staining, odor, or elevated PID readings are observed. If visible staining, odor, or elevated PID readings are not observed, soil samples are to be collected for laboratory analysis at minimum intervals of 5 feet. The soil samples are to be analyzed for TPH as gasoline, TPH as diesel, and TPH as bunker oil using EPA Method 8015M and BTEX and fuel oxygenates using EPA Method 8260. Please present the results in the Well Installation and Sampling Report requested below.
- 2. Monitoring Well Construction.** Please include a table of well construction details in the Well Installation and Sampling Report requested below. For all monitoring wells on and off-site, the well construction table is to describe the well diameter, screen slot size, total depth of the boring, depths of the screened interval, depths of the filter pack, and other well construction details that may be relevant. Please show the screen intervals for all monitoring wells on the hydrogeologic cross sections requested in technical comment 4.
- 3. Well Survey.** The "*Soil and Groundwater Investigation Report – May 15, 2008,*" refers to a well survey conducted in January 1988; however, the locations of nearby wells are not shown. Please complete an updated, detailed well survey to locate all water supply wells within 2,000 ft of the

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subject site. Submittal of maps showing the location of all wells identified in your study, and the use of tables to report the data, including well construction details, collected as part of your survey are required. Well construction details are to include the well diameter, screen slot size, total depth of the boring, depths of the screened interval, depths of the filter pack, year of installation, and other construction details that may be relevant. The status of the water supply well, whether active, decommissioned, or unknown is to be included where known. Please present the results in the Well Installation and Sampling Report requested below.

4. **Hydrogeologic Cross Sections.** Detailed hydrogeologic cross sections were presented in a previous report for the site entitled, "*Off-Site Subsurface Investigation Report*," dated March 20, 2002 and prepared by Gettler-Ryan, Inc. We request that you review the previous cross sections and prepare updated cross sections incorporating data from the more recent soil borings and monitoring wells. Please present the updated cross sections in the Well Installation and Sampling Report requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **July 23, 2009** – Well Installation and Sampling Report
- **35 days following end of each quarter** – Groundwater Monitoring Reports

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

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PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

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.

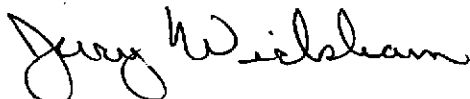
AGENCY OVERSIGHT

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.

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If you have any questions, please call me at 510-567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Cheryl Dizon, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway,
Livermore, CA 94551

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street
Pleasanton, CA 94566

Les Hausrath, Wendel, Rosen, Black & Dean, 1111 Broadway, 24th Floor, Oakland, CA 94607

Rory MacNeil, Alameda County Public Works, 399 Elmhurst Street, Hayward, CA 94544-1307

John Reay, Delta Environmental Consultants, Inc., 11050 White Rock Road, Suite 110,
Rancho Cordova, CA 95670

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

**Alameda County Environmental Cleanup
Oversight Programs
(LOP and SLIC)**

ISSUE DATE: July 5, 2005

REVISION DATE: December 16, 2005

PREVIOUS REVISIONS: October 31, 2005

ACTION: Miscellaneous Administrative Topics & Procedures

SUBJECT: Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, 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

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- 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)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in Excel format. These are for use by assigned Caseworker only.

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 dehloptoxic@acgov.org
or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
- 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 and Firefox browsers will not open the FTP site.
- b) Click on File, then on Login As.
- 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 dehloptoxic@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 at 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)