



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

October 19, 2010

Mr. Bill Borgh (Sent via E-mail to: Bill.Borgh@conocophillips.com)
ConocoPhillips Company
76 Broadway
Sacramento, CA 95818

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

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

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

Subject: Review of Revised Draft Corrective Action Plan for Fuel Leak Case No. RO0000361 and Geotracker Global ID T0600100101, Unocal #7376, 4191 First Street, Pleasanton, CA 94566

Dear Mr. Borgh:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the most recent report entitled, "*Revised Corrective Action Plan, 76 Service Station #7376, 4191 First Street, Pleasanton, CA,*" dated September 30, 2010 (Revised CAP). The Revised CAP, which was prepared on behalf of ConocoPhillips by Delta Environmental, evaluates remedial alternatives and recommends the use of soil vapor extraction (SVE) and groundwater extraction (GWE). The CAP was revised in response to technical comments included in ACEH correspondence dated August 25, 2010.

Based on our review of the Revised CAP, we have several technical comments that require some revisions to the proposed corrective action. However, we believe these technical comments are not substantive enough to further delay public review of the proposed corrective action. Therefore, ACEH will now mail out the attached Fact Sheet describing the proposed corrective action to surrounding landowners and residents.

We believe that the technical comments below can be addressed during the preparation of engineering plans and drawings for the remedial system without preparation of another Revised CAP. Therefore, we request that you address the technical comments below and incorporate the revisions into a Remedial Action Plan that includes engineering plans and drawings for the remedial system. Please note that final approval of the proposed corrective action will be contingent upon completion of the public review process. Any comments received during the public comment period will be forwarded to you and potentially could require some modifications or additions to the proposed cleanup plans.

TECHNICAL COMMENTS

- 1. Targeted Cleanup Goals.** We request the following revisions to the targeted cleanup goals. The cleanup goals for MTBE should be 0.023 milligrams per kilogram (mg/kg) for soil and 5 micrograms per Liter ($\mu\text{g/L}$) for groundwater. The proposed cleanup goal of 5,000 mg/kg for TPH as residual fuels applies only to soils greater than 3 meters bgs. For soils less than 3 meters bgs, the cleanup goal for TPH as residual fuels should be 370 mg/kg.
- 2. Locations of BSK Associates Borings.** A total of seven soil borings (SB-1 through SB-7) were advanced and sampled by BSK Associates in 2007. A comparison of the Site Plan (Figure 10) from the BSK Associates report entitled, "Phase II Soil Investigation Report," dated January 25, 2008 to Figure 2 – Site Plan with Historic Boring Locations in the Revised CAP indicates an apparent discrepancy in the boring locations between the base maps. We have attached the Site Plan (Figure 10) from the BSK Associates report and Figure 2 from the Revised CAP for comparison purposes. Please review these boring locations and revise future site plans as necessary. Soil boring SB-5 as shown on the BSK Associates site plan, is southwest of the commercial building and southwest of the location shown on Figure 2 – Site Plan in the Revised CAP. Significant concentrations of petroleum hydrocarbons were detected in soil samples from boring SB-5, which may be located outside of the currently proposed treatment area. Please see technical comment 3 regarding including expanding the area of treatment to include this area.
- 3. Number and Spacing of SVE Wells.** Thank you for revising the number and spacing of SVE wells in response to our August 25, 2010 request. We believe the decreased spacing and increased number of SVE wells will improve the effectiveness of the system. In comparing the extent of contamination to the proposed treatment area, we noted that high concentrations of petroleum hydrocarbons were detected in soil samples from boring B-10, which is southwest of the area of proposed SVE treatment. Soil samples collected from 24.5 and 31 feet bgs in B-10 contained 5.1 and 7.3 mg/kg of benzene, respectively and 1,900 and 970 mg/kg of TPHg, respectively. As noted in technical comment 2, boring SB-5 also appears to be located outside the proposed treatment area. In order to address the contamination in these areas, we request that you expand the treatment area by adding one SVE well southwest of VE-5, one well southwest of VE-9, one well southwest of VE-11, and one well southwest of VE-15. Please include these revisions in the Remedial Action Plan requested below.
- 4. Proposed Screen Intervals for SVE Wells.** Proposed SVE wells VE-12 through VE-19, which are located in the off-site transportation corridor, will be screened from 31 to 41 feet bgs. We concur that targeting this zone of contamination for SVE is appropriate. However, significant contamination has also been detected below a depth of 41 feet in the area of SB-5 and CWB-1. Furthermore, the hydrocarbon recovery rates during the SVE pilot test conducted on wells in the CWB cluster were significantly higher in deeper wells CWB-1 and CWB-2. Well CWB-1, which is screened from 55 to 65 feet bgs had an initial extraction rate of 102 pounds per day in comparison to an initial extraction rate of 40 pounds per day for CWB-3, which is screened from 30 to 35 feet bgs. However, the Revised CAP proposes using only well CWB-3 in the CWB cluster for SVE. We request that SVE also target the deeper coarse-grained zones intersected by the screen interval for CWB-1. Therefore, we request that well CWB-1 also be used for SVE and SVE wells with deeper screen intervals be added at locations VE-12 through VE-19.

5. **Remediation Monitoring.** In the Remedial Action Plan requested below, please include the plans for monitoring system start-up and long-term remedial performance.

TECHNICAL REPORT REQUEST

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

- **December 20, 2010** – Remedial Action Plan with Engineering Plans and Drawings
- **January 18, 2011** – Semi-annual Groundwater Monitoring Report, Fourth Quarter 2010
- **July 18, 2010** – Semi-annual Groundwater Monitoring Report, Second Quarter 2010

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

Attachments: Fact Sheet dated October 19, 2010
Figure 10 from the BSK Associates Report dated January 25, 2008
Figure 2 from the Revised CAP dated September - 2010
Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Danielle Stefani, Livermore Pleasanton Fire Department, 3560 Nevada St, Pleasanton, CA 94566
(Sent via E-mail to: dstefani@lpfire.org)

Cheryl Dizon (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551
(Sent via E-mail to: cdizon@zone7water.com)

R. Lee Dooley, Delta Consultants, 312 Piercy Road, San Jose, CA 95138 (Sent via E-mail to: ldooley@deltaenv.com)

Les Hausrath, Wendel, Rosen, Black & Dean, 1111 Broadway, 24th Floor, Oakland, CA 94607 (Sent via E-mail to: LHausrath@wendel.com)

Responsible Parties
RO0000361
October 19, 2010
Page 4

Christine Noma, Wendel, Rosen, Black & Dean, 1111 Broadway, 24th Floor, Oakland, CA 94607
(Sent via E-mail to: CNoma@wendel.com)

Rory MacNeil, Alameda County Public Works, 399 Elmhurst Street, Hayward, CA 94544-1307 (Sent
via E-mail to: rory@acpwa.org)

Donna Drogos, ACEH (Sent via E-mail to: donna.drogos@acgov.org)

Jerry Wickham, ACEH (Sent via E-mail to: jerry.wickham@acgov.org)

Geotracker, File



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

FACT SHEET
4191 FIRST STREET, PLEASANTON
October 19, 2010

Site Name: Unocal #7376
Site Location: 4191 First Street, Pleasanton, CA 94566
Fuel Leak Case RO0000361 and GeoTracker Global ID T0600100101

Summary – This fact sheet has been prepared to inform community members and other interested parties of a proposed cleanup action for a fuel leak case at 4191 First Street in Pleasanton, California (see attached map on back). Petroleum hydrocarbons, consisting of a mixture of gasoline and older fuel oil, are present in soil and groundwater beneath the site. The gasoline appears to have leaked from the fuel system at the site sometime prior to 1994. The heavier petroleum hydrocarbons appear to be from a former Bunker C fuel tank that was located immediately north of the site. The gasoline, including the fuel oxygenate MTBE has dissolved in groundwater beneath the site. A plume of contaminated groundwater extends approximately 150 feet north from the site beneath a former railroad right-of-way that is currently an unoccupied open area. The plume, which is generally 50 to 70 feet below ground surface (bgs) is not expected to affect any water supply wells or pose a potential risk to nearby residents.


The proposed cleanup will consist of soil vapor extraction (SVE) from eleven extraction wells on-site and thirteen extraction wells located within the former railroad right-of-way to the north. Soil vapor extraction applies a vacuum to the zones of contaminated soils to remove the volatile petroleum hydrocarbons. Vapors that are recovered by the SVE system will be treated at the surface with a thermal oxidizing unit to remove contaminants from the effluent in order to meet air discharge permit requirements. A pilot test, which was conducted in April 2010, found that SVE was a feasible method for site cleanup. A treatment compound will be constructed on-site to contain the thermal oxidizing unit and a blower to provide the vacuum for SVE. Underground piping will connect each of the extraction wells to the blower. In addition to SVE, groundwater will be extracted from one well located within the right-of-way to remove petroleum hydrocarbons and control plume migration. The extracted groundwater will be treated by granular activated carbon (GAC) and then discharged to the sanitary sewer under a discharge permit from the local sanitation district. Performance of the cleanup system will be monitored by periodic influent and effluent air monitoring and groundwater monitoring.


Background – The site is an active gasoline service station. Surrounding land use is mixed commercial and residential. Groundwater is typically encountered at depths of 50 to 70 feet bgs with perched groundwater encountered in some areas at a depth of approximately 35 feet bgs. Soils consist of interbedded fine and coarse-grained soils that dip to the northwest.


Next Step – The public is invited to review and comment on the proposed cleanup action for the fuel leak case. The proposed cleanup action is described in a document entitled, "Revised Corrective Action Plan," dated September 30, 2010. The entire case file can be viewed over the Internet on the ACEH website (<http://www.acgov.org/aceh/lop/ust.htm>) or the State of California Water Resources Control Board Geotracker website (<http://geotracker.swrcb.ca.gov>). Please send written comments to Jerry Wickham at the address below; all comments will be forwarded to the responsible party. **Comments received by November 23, 2010** will be considered and responded to prior to a final determination on the proposed case closure.

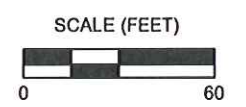
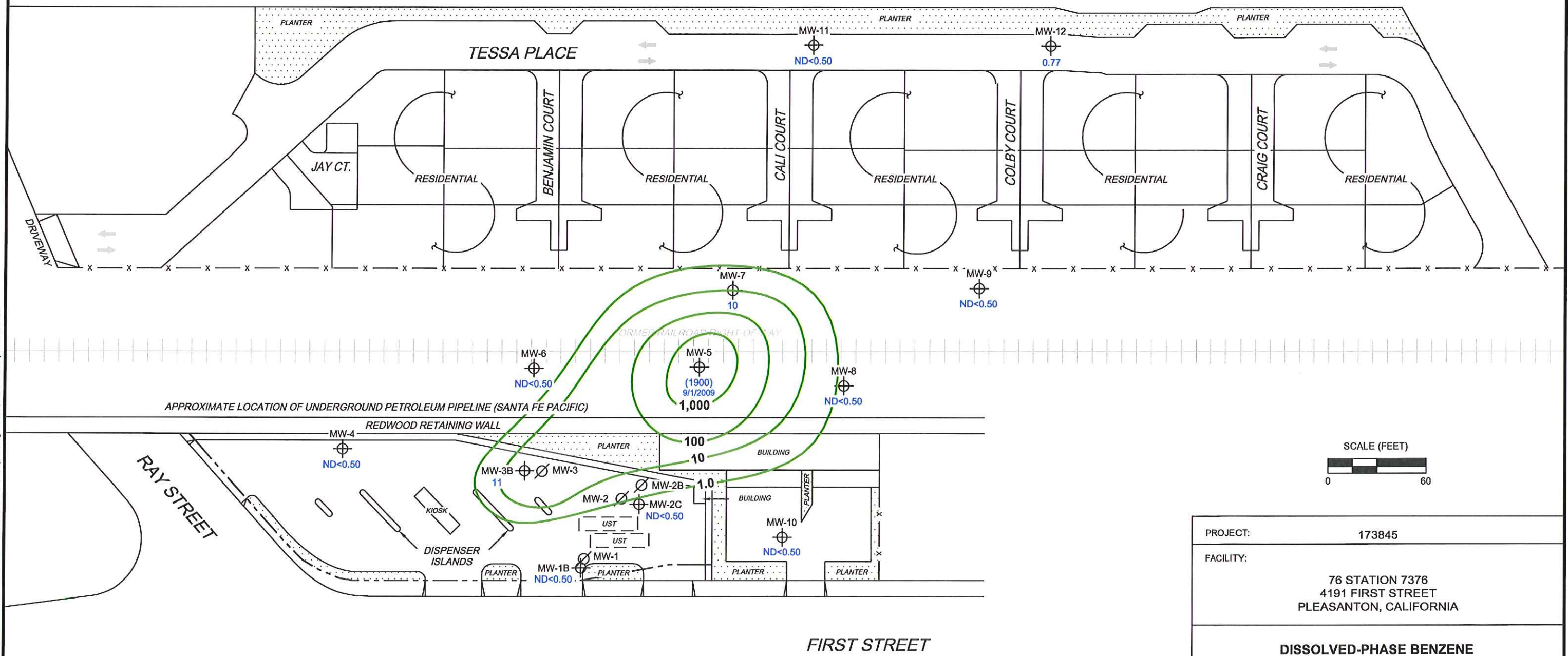
Additional information: Contact Jerry Wickham of the Alameda County Department of Environmental Health, 1131 Harbor Bay Parkway, Alameda, CA 94502 at 510-567-6791 or by email at jerry.wickham@acgov.org

LEGEND

MW-12  Monitoring Well with Dissolved-Phase Benzene Concentration ($\mu\text{g/l}$)

MW-3  Abandoned well

 1,000 Dissolved-Phase Benzene Contour ($\mu\text{g/l}$)



PROJECT:	173845
FACILITY:	76 STATION 7376 4191 FIRST STREET PLEASANTON, CALIFORNIA
DISSOLVED-PHASE BENZENE CONCENTRATION MAP June 18, 2010	

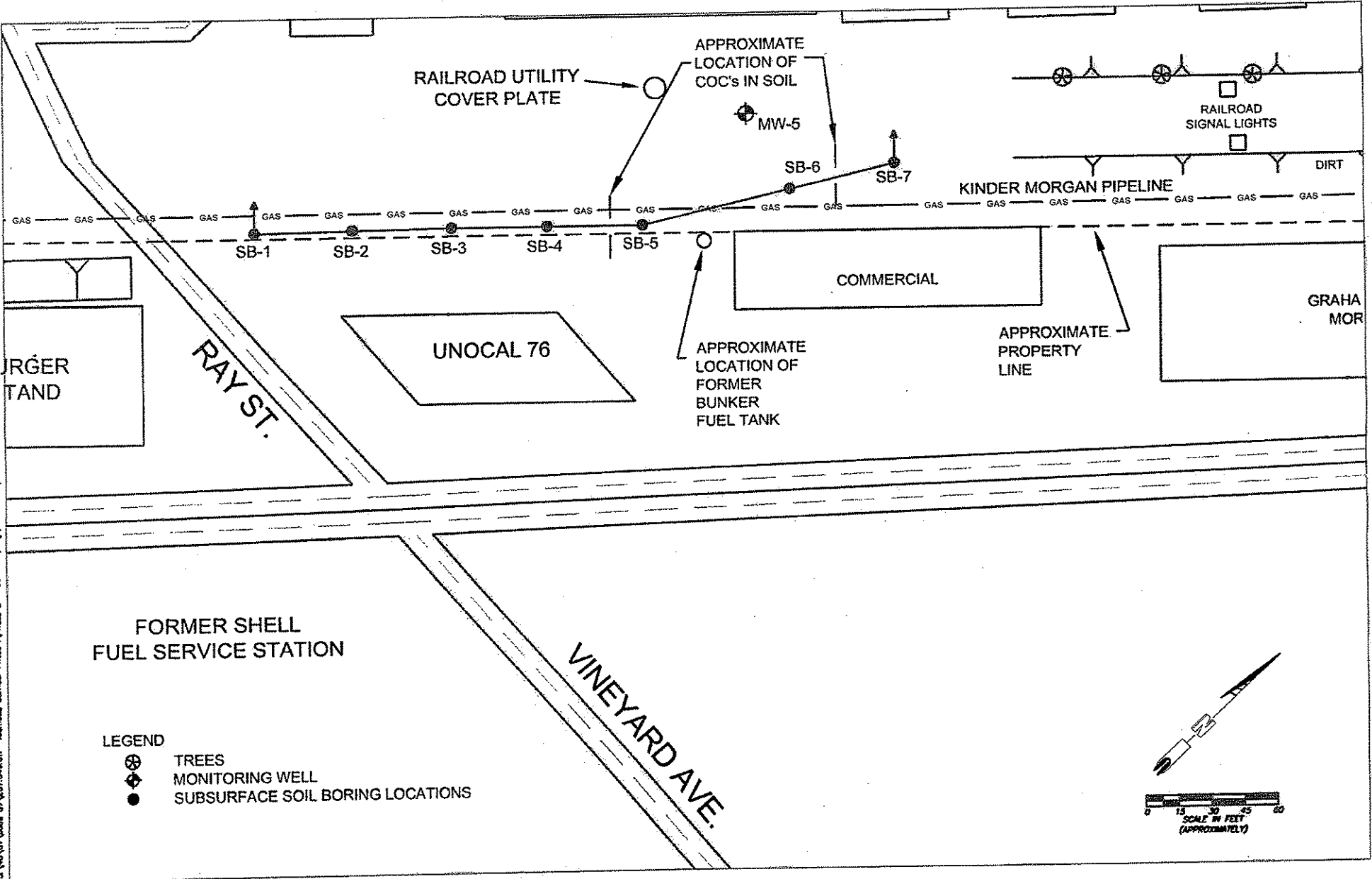
NOTES:

Contour lines are interpretive and based on laboratory analysis results of groundwater samples.
 $\mu\text{g/l}$ = micrograms per liter. ND = not detected at limit indicated on official laboratory report.
 () = representative historical value. UST = underground storage tank.



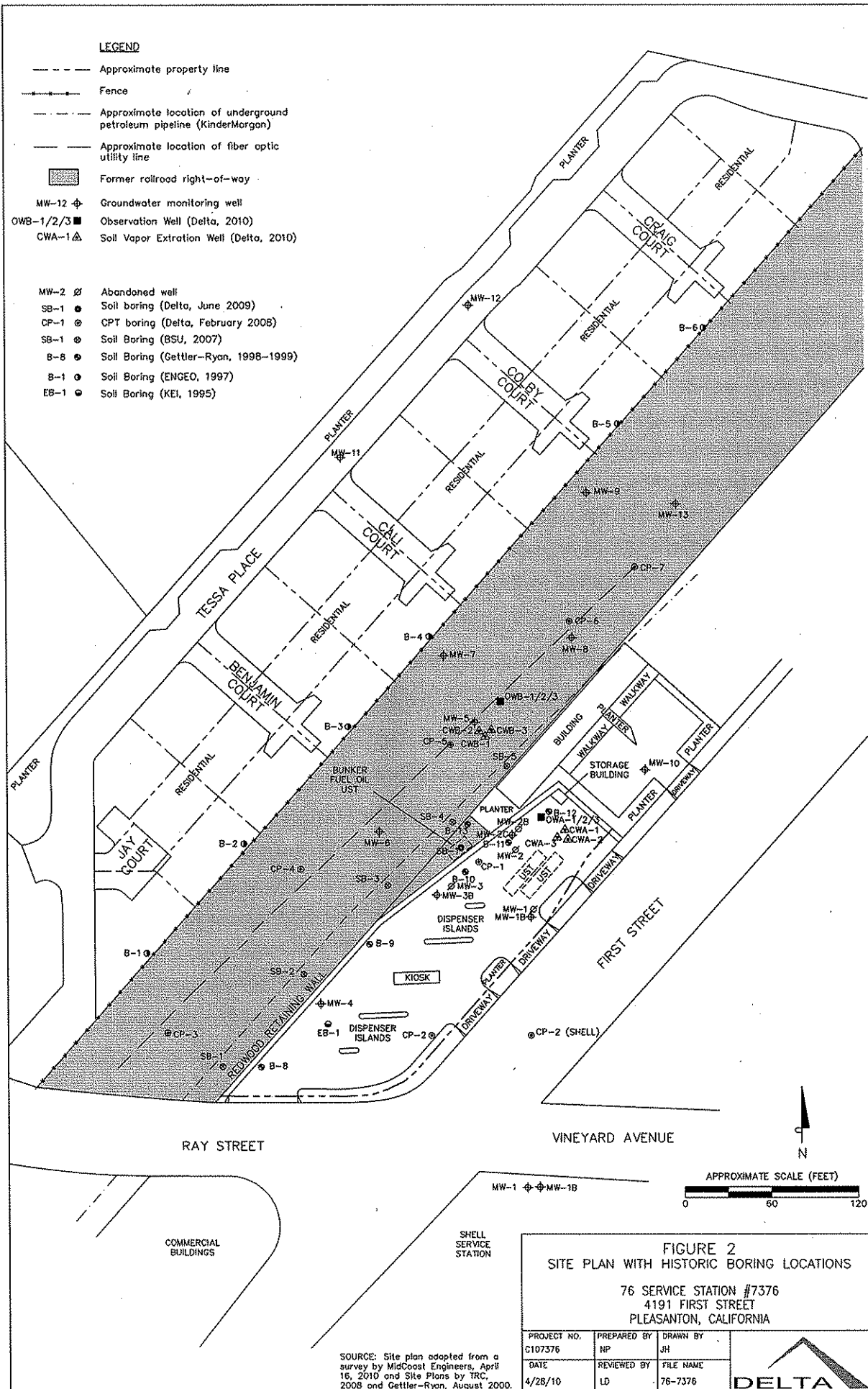
FIGURE 4

MS=1:60 7376-003 L:\Graphics\GIS\NORTH-SOUTH\7376-1\7376qms.dwg Jul 09, 2010 - 1:37pm bschmidt



SITE PLAN

Alameda County Transportation Corridor Phase II
 County of Alameda APN: 946 168000901 & 946 168000902
 Pleasanton, California



LEGEND

- Approximate property line
- Fence
- Approximate location of underground petroleum pipeline (KinderMorgan)
- Approximate location of fiber optic utility line
- ▨ Former railroad right-of-way
- MW-12 ⊕ Groundwater monitoring well
- OWB-1/2/3 ■ Observation Well (Delta, 2010)
- CWA-1 ▲ Soil Vapor Extration Well (Delta, 2010)
- MW-2 ⊕ Abandoned well
- SB-1 ● Soil boring (Delta, June 2009)
- CP-1 ⊕ CPT boring (Delta, February 2008)
- SB-1 ⊕ Soil Boring (BSU, 2007)
- B-8 ● Soil Boring (Gettler-Ryan, 1998-1999)
- B-1 ● Soil Boring (ENGE0, 1997)
- EB-1 ● Soil Boring (KEI, 1995)

FIGURE 2
SITE PLAN WITH HISTORIC BORING LOCATIONS
 76 SERVICE STATION #7376
 4191 FIRST STREET
 PLEASANTON, CALIFORNIA

PROJECT NO. C107376	PREPARED BY NP	DRAWN BY JH
DATE 4/28/10	REVIEWED BY LD	FILE NAME 76-7376

SOURCE: Site plan adapted from a survey by MidCoast Engineers, April 18, 2010 and Site Plans by TRC, 2008 and Gettler-Ryan, August 2000.



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.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml).

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)	ISSUE DATE: July 5, 2005
	REVISION DATE: July 8, 2010
	PREVIOUS REVISIONS: December 16, 2005, October 31, 2005
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

- 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 Teena Le Khan.
 - 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 Page on upper right side of browser, 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 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 @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.