

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

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December 23, 2011

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Subject: Response to UST Cleanup Fund Second Five Year Review for Fuel Leak Case No. RO0000368 (Global ID # T0600100303), Chevron #9-8139, 16304 Foothill Blvd, San Leandro, CA 94587

Mr. Cullen and Mr. Trommer:

ACEH has received the second 5-Year Review Summary Report dated October 12, 2011 from the Underground Storage Tank Cleanup Fund (USTCF) for the site listed below. The Summary Report represents the second five year review of this site managed by the ACEH Local Oversight Program by the Fund. The Fund correspondence requests that ACEH respond to the Fund correspondence within 45 days of the date of the letters (November 26<sup>th</sup>). We have reviewed the contents of the correspondence in the context of the appropriateness of recommendations. However, we have not reviewed the reports for accuracy of all information presented.

ACEH Case: RO0000368  
USTCF Claim: 5995  
Global ID: T0600100368  
Site Name: Chevron #9-8139  
Site Address: 16304 Foothill Blvd, San Leandro, CA

USTCF Recommendations from October 12, 2011 Review Summary:

- The Fund staff recommends the LOP consider this Site for closure.

Initial ACEH Response: ACEH is not in agreement with this recommendation.

The Fund staff should be aware that ACEH issued a directive letter in July 2011 that was inadvertently not posted to Geotracker; that has been rectified. ACEH is in general agreement that the case is mature; however several data gaps appear to be present. Principally the presence of back yard residential wells in the downgradient direction is well established, and the existing well survey was provided from unknown sources by Chevron, a potential conflict of interest. A new survey has been requested. Additionally, a recent increase in groundwater concentrations is present at the site vicinity (and is captured on the trend graph contained in the Fund staff letter). This may indicate a new release, or the migration of a detached plume, toward downgradient residential wells. To better understand the recent trend, and to capture wells unsampled since 2005, ACEH has additionally requested the redevelopment and sampling of unsampled wells prior to an updated trend analysis. For these reasons, ACEH requests revision of the Fund staff recommendations along the lines of: "The Fund staff concurs with recent LOP".

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Additional Comments: The USTCF has recommended closure of the site based on groundwater concentrations remaining in groundwater in existing wells at the site, using partially downgradient well MW-8 to illustrate the trend. The recent directive letter referenced above, requested the resampling of site wells and an updated well survey, and both events have generated useful data. The recent resampling of site wells found an increase in MTBE concentrations from the previous sampling event in August 2005 in well MW-13 (470 to 1,700 µg/l), located further downgradient than MW-8. An updated well survey also located several older “backyard” residential irrigation wells downgradient in the vicinity, while a review of the vicinity on Google Maps indicates the further potential for additional “unregistered” downgradient “backyard” wells to be present. Based on direct (and very recent experience), ACEH has found that many older areas of San Lorenzo contain an above average number of “backyard” residential or irrigation wells; some of which continue to be used. These wells are both registered and unregistered (and are thus unknown if unregistered). Specifically the Google Map review of the vicinity found several older larger residential [and non-residential] parcels. These have been found to typically predate urbanization of this region of the East Bay Plan (older residential homes on large subsequently subdivided parcels), and typically have a higher probability of containing an older well [registered or unregistered].

Because this site has previously had elevated detected MTBE concentrations (up to 27,000 µg/l) and because the MTBE concentration in downgradient well MW-13 has risen since the previous sampling event, ACEH has requested a focused neighborhood door to door well survey in an attempt to locate known registered wells and to locate potential unregistered wells, and to sample those wells for site specific contaminants. Specifically ACEH has requested the door to door survey be bound by Maubert Court on the south, Bevil Way on the west (extending to 162<sup>nd</sup> Avenue), 162 Avenue on the north, and Liberty Street on the east.

Thank you for providing ACEH with the opportunity to comment on the subject site. Should you have any questions regarding the responses above, please contact me at (510) 567-6876 or send me an electronic mail message at [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org).

Sincerely,

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Senior Hazardous Materials Specialist

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