



September 22, 2017

Mr. David Patten
Chevron Environmental Management Co.
6101 Bollinger Canyon Road
San Ramon, CA 94583
(Sent via electronic mail to: drpatten@chevron.com)

Subject: Request for Meeting; Fuel Leak Case No. RO0000383 (Global ID # T0600100315),
Chevron #9-0260, 21995 Foothill Boulevard, Hayward, CA 94541

Dear Mr. Patten:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file for the above referenced site including the *Feasibility Study / Corrective Action Plan Addendum*, dated July 27, 2017, and the *Second Quarter 2017, Groundwater Monitoring and Sampling Report*, dated August 25, 2017. The reports were prepared and submitted on your behalf by GHD.

The referenced Feasibility Study / Corrective Action Plan (FS/CAP) Addendum analyzed site groundwater trends and found trends to be stable and declining, that the hydrocarbon plume is shrinking in total areal extent, and found that no additional active remediation necessary at the site and vicinity. The referenced Addendum additionally proposed the installation of sulfate containing canisters, with quarterly change outs, in two additional wells (MW-13 and MW-18) as well as the originally proposed wells (MW-5, DVE-20, SVE-9, DVE-12, and MW-8).

ACDEH notes that the Addendum misinterpreted the State Water Board's (SWB) Review Summary Report (RSR), dated April 6, 2017, which found that Free Phase (FP) had not been observed in site wells since 2007. The RSR did not comment on Light Non Aqueous Phased Liquids (LNAPL) in soil, as was stated in the Addendum. LNAPL in soil has been identified by ACDEH as a potential cause for the substantial concentrations of Total Petroleum Hydrocarbons as gasoline (TPHg) in groundwater. Concentrations up to 83,000 micrograms per liter [$\mu\text{g/l}$] TPHg in well MW-5 were reported in the referenced groundwater monitoring report. Technical justification papers issued by the SWB to support the Low Threat Closure Policy (LTCP) state that concentrations of TPHg in excess of 20,000 $\mu\text{g/l}$ are indirect evidence of LNAPL beneath a site. Concentrations in excess of 20,000 $\mu\text{g/l}$ have been present at the site in well MW-5 continually since May 2003. Please be aware that consistent with the LTCP justification papers, ACDEH makes a distinction between FP, which is considered to be equivalent to migrating or mobile LNAPL, and residual, immobile LNAPL, which retains the ability to degrade groundwater.

Based on staff review of the work plan, ACDEH requests a meeting of interested parties in order to discuss the Site Conceptual Model (SCM) and the proposal for the installation of sulfate canisters in the seven wells.

TECHNICAL COMMENTS

1. **Meeting Identification Dates** – Please identify potential meeting dates and times by the date identified below. ACDEH will select from among the proposed dates and times, or propose alternative dates and times, should conflicts already exist.
2. **Quarterly Groundwater Monitoring** – Please continue with quarterly groundwater monitoring and submit reports by the dates identified below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention below and schedule:

- **October 6, 2017** – Potential meeting dates and times; Please email your case worker
- **October 6, 2017** – Offsite Investigation (Extended date, per request for extension approved July 18, 2017); File to be named: RO383_SWI_R_YYYY-MM-DD
- **December 8, 2017** – Third Quarter 2017 Quarterly Groundwater Monitoring Report and Interim Remediation Results; File to be named: RO383_GWM_REM_R_YYYY-MM-DD
- **March 2, 2018** – Fourth Quarter 2017 Quarterly Groundwater Monitoring Report and Interim Remediation Results; File to be named: RO383_GWM_REM_R_YYYY-MM-DD
- **June 1, 2018** – First Quarter 2018 Quarterly Groundwater Monitoring Report and Interim Remediation Results; File to be named: RO383_GWM_REM_R_YYYY-MM-DD
- **September 7, 2018** – Second Quarter 2018 Quarterly Groundwater Monitoring Report and Interim Remediation Results; File to be named: RO383_GWM_REM_R_YYYY-MM-DD

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. 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

Should you have any questions, please contact me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,



Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations
Electronic Report Upload (ftp) Instructions

cc: Kiersten Hoey, GHD, 5900 Hollis Street, Suite A, Emeryville, CA 94608; (Sent via electronic mail to: Kiersten.Hoey@ghd.com)

Greg Barclay, GHD, 5900 Hollis Street, Suite A, Emeryville, CA 94608; (Sent via electronic mail to: Greg.Barcly@ghd.com)

Dilan Roe, ACDEH, (Sent via electronic mail to: dilan.roe@acgov.org)
Paresh Khatri, ACDEH; (Sent via electronic mail to: paresh.khatri@acgov.org)
Mark Detterman, ACDEH, (Sent via electronic mail to: mark.detterman@acgov.org)
Electronic File; GeoTracker

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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) 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 File Transfer Protocol (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 SCP 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 (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/) for more information on these requirements.

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the SWRCB's GeoTracker website." 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 6731, 6735, and 7835) 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 licensed 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 case meet this requirement. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, late 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 SCP)	REVISION DATE: December 1, 2016
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions


The Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) 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

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

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 deh.loptoxic@acgov.org.
 - 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) Open File Explorer using the Windows  key + E keyboard shortcut.
 - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) On the address bar, type in ftp://alcoftp1.acgov.org.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
 - d) Click Log On.
 - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - f) 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 deh.loptoxic@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.