

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY, SUITE 250
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

October 19, 2017

James Kiernan
Chevron Environmental Management Company
6101 Bollinger Canyon Road
San Ramon, CA 94583
(Sent via E-mail to:
J.Kiernan@Chevron.com)

Ed Ralston
Phillips 66 Company
76 Broadway
Sacramento, CA 95818
(Sent via E-mail to: Ed.C.Ralston@p66.com)

Rajan Goswamy
4276 MacArthur Boulevard
Oakland, CA 94619
(Sent via E-mail to: rajgoswamy@sbcglobal.net)

Carole Quick and Lorraine Mudgett
10214 SW Stuart Court
Portland, OR 97224-4304

Erna G. Renoud et. al
561 Lighthouse Avenue
Pacific Grove, CA 93950

Subject: Conditional Approval of Additional Site Investigation Work Plan, Fuel Leak Case No. RO0000409 and GeoTracker Global ID T0600102279, Unocal #1156, 4276 MacArthur Boulevard, Oakland, CA 94619

Dear Responsible Parties:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file for the above-referenced site, including the *Additional Site Investigation Work Plan*, prepared by Arcadis U.S., Inc., and dated 11 May 2017 ("the workplan"). To further evaluate subsurface conditions north and west of the existing station building, the workplan proposes soil, groundwater and soil vapor sampling. The field investigation will include: (1) advancing 24 temporary soil borings to approximately 8 feet bgs to collect soil samples, (2) one soil boring to approximately 30 feet bgs to collect depth-discrete soil and groundwater samples, and (3) collecting a soil gas sample from each of 5 soil gas well (SV-1, SV-2, SVW-1, SVW-2, and SVW-3).

Based on our review of the case file, ACDEH conditionally approves the Work Plan provided that you address the technical comments listed below as part of the implementation. Submittal of a revised workplan or a workplan addendum is not required. We request that you address the following technical comments as part of your implementation of the workplan, and perform the proposed work in conformance with the conditions listed below. Provide 72-hour written notification to Robert.schultz@acgov.org prior to the start of field activities. Send us the reports described below according to the specified schedule.

TECHNICAL COMMENTS

1. **Submittal of Site History and Environmental Data.** All analytical laboratory data, environmental site investigation reports, environmental site assessment reports (e.g., Phase I ESAs), historical data relevant to environmental conditions at the site or to past site operations that may have included handling or storage of petroleum products or hazardous materials must be submitted to the ACDEH. Any available historical or environmental data for adjoining properties or the surrounding area (such as historical Sanborn Fire Insurance maps, historical aerial photographs, historical topographic maps, city directory abstracts, building department records, etc.) that may provide additional information relevant to site conditions or potential exposure of site occupants must be submitted to the ACDEH.

The ACDEH is concerned about the potential threats to public health and the environment that could be posed by subsurface contamination detected at the site. Soil gas concentration data and surveyed locations of wells SV-1 through SV-7 must be uploaded to Geotracker.

2. **Sample Analysis.** All soil samples collected pursuant to the workplan will be analyzed for BTEX, the 16 priority pollutant PAHs, chlorinated solvents, fuel oxygenates and LUFT metals, and results will be reported to the ACDEH. Recommended analytes and analytical methods for waste motor oils are listed in the SWRCB LUFT Manual, September 2012. Groundwater and soil gas samples will be analyzed for the 51 Common Organic Compounds listed in Section 6.1 of the DTSC Active Soil Gas Investigations- Advisory, July 2015. The DTSC Advisory list includes chlorinated solvents and 1,4-dioxane, in addition to other potential chemicals of concern.

Chlorinated solvents have been detected in site groundwater, including 334 ug/L tetrachloroethylene (PCE) in well MW-1. In January 2017, Arcadis observed a steel canister and a flask shaped metal bottle while drilling at location PZ-1. The upper 5 feet of the site appears to consist of undocumented fill. In a 10 March 2011 letter to the responsible parties for this site, the ACDEH requested that soil gas and indoor air samples collected at the site and at the Oakland Veterinary Clinic, 4258 MacArthur Blvd., be analyzed for chlorinated solvents, and that results be reported to the ACDEH. Chlorinated solvent concentration data for soil gas and air samples have not been submitted, so this site is currently out of compliance with ACDEH directives.

3. **Delineation of Groundwater Impacts.** The length of the benzene plume greater than water quality objectives in groundwater was previously estimated to be approximately 360 feet (Attachment 2). Update the assessment of the extent of benzene pollution from the site in groundwater and submit isoconcentration maps for benzene and TPHg. If chlorinated hydrocarbons are detected in groundwater during implementation of the workplan, the extent of these compounds in groundwater also needs to be defined. Semi-annual groundwater monitoring is required at this site.
4. **Remedial Action Plan.** During the 8 March 2017 meeting regarding site cleanup, the ACDEH requested a Remedial Action Plan (RAP) for the site. The RAP must address chlorinated solvents at the site. The ACDEH recommends scheduling a meeting with us to review the results from implementation of the workplan, and discussion of appropriate remedial actions. We suggest a meeting on Tuesday 5 December 2017, or Tuesday 12 December 2017.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

ACDEH requires a Submittal Acknowledgement Statement, signed by the Responsible Party (RP), as a cover letter to technical reports and submittals. The requirement is described in Attachment 1. The language for the Submittal Acknowledgement Statement is as follows:

"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 State Water Resources Control Board's GeoTracker website."

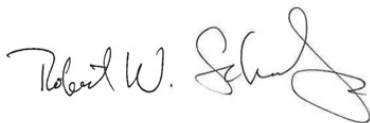
TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH ftp site (instructions to comply with this requirement are attached), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- 19 January 2018 – Additional Investigation Report;
File to be named: RO0409_SWI_yyyy-mm-dd
- 31 January 2018 – Groundwater Monitoring Report – 2nd Half 2017
File to be named: RO2580_GWM_yyyy-mm-dd
- 23 March 2018 –Remedial Action Plan;
File to be named: RO0409_RAP_yyyy-mm-dd
- 31 July and 31 January Each Year – Semi-Annual Groundwater Monitoring Report, ongoing semi-annual groundwater monitoring is required for this site.

If you have any questions, please call me at (510) 567-6721 or send me an electronic mail message at robert.schultz@acgov.org. Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Sincerely,



Robert W. Schultz, CHG
Senior Hazardous Materials Specialist

Attachment: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations &
ACEH Electronic Report Upload (ftp) Instructions
Attachment 2 – TRC, 2004, Dissolved-Phase Benzene Concentration Map, 12 July.

cc: Maureen Dorsey, Oakland Veterinary Clinic, 4258 MacArthur Boulevard, Oakland, CA 94619 (Sent via E-mail to: mddvm@oaklandvet.com)
Katherine Brandt, ARCADIS, 2999 Oak Road, Suite 300, Walnut Creek, CA 94597
(Sent via E-mail to: Katherine.Brandt@arcadis.com)

Mr. Kiernan, Mr. Ralston, Ms. Quick, Ms. Mudget, Ms. Renoud, and Mr. Goswamy
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Samuel Miles, ARCADIS, 1100 Olive Way, Suite 800, Seattle, Washington, CA 98101

(Sent via E-mail to: Samuel.Miles@arcadis.com)

John Kevlin, Reuben, Junius & Rose LLP, 827 Broadway, Suite 205, Oakland, CA 94607 (Sent via E-mail to: jkevin@reubenlaw.com)

Nicholas Niuro, Rogers Joseph O'Donnell, 311 California Street, 10th Fl., San Francisco, CA 94104
(Sent via E-mail to: NNiuro@rjo.com)

Dilan Roe, ACEH (Sent via E-mail to: dilan.roe@acgov.org)

GeoTracker, eFile

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.

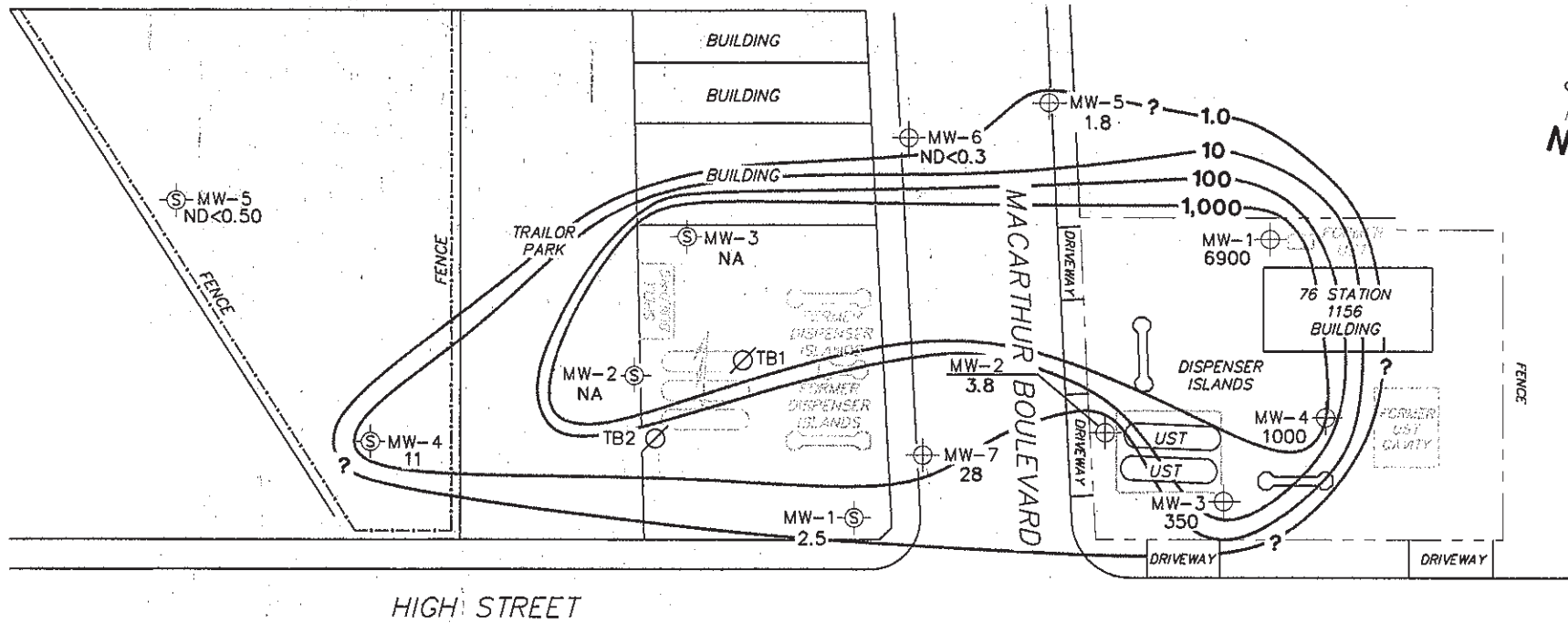
REQUIREMENTS

- **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 acknowledgement 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.



LEGEND

- MW-5 76 Monitoring Well with Dissolved-Phase Benzene Concentration ($\mu\text{g}/\text{l}$)
- MW-7 Shell Monitoring Well
- TB2 Destroyed Shell Well
- Dissolved-Phase Benzene Contour ($\mu\text{g}/\text{l}$)

DISSOLVED-PHASE BENZENE CONCENTRATION MAP
July 12, 2004

76 Station 1156
4276 MacArthur Boulevard
Oakland, California

FIGURE 4

NOTES:

Contour lines are interpretive and based on laboratory analysis results of groundwater samples. $\mu\text{g}/\text{l}$ = micrograms per liter. ND = not detected at limit indicated on official laboratory report. UST = underground storage tank. NA = not analyzed, measured, or collected.



SCALE (FEET)



PS=1:1 1156-003