

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
ALEX BRISCOE, Agency Director



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December 11, 2015

Ms. Carryl MacLeod
Chevron Environmental Management Company
6101 Bollinger Canyon Road
San Ramon, CA 94583
(sent via email to CMacleod@chevron.com)

9401 San Leandro LP
104 Caledonia Street
Sausalito, CA 94965

Linda Hothem Trust
c/o Mr. Jan Greban
Greben & Associates
1332 Anacapa Street
Suite 110
Santa Barbara, CA 93101
(sent via email to
Jan@grebenlaw.com)

Mr. Francis Meynard
Pacific American Group
104 Caledonia Street
Sausalito, CA 94965
(sent via email to
FMeynard@pacamgroup.com)

Ms. Gene Kida
Gerber Products
12 Vreeland Road
Fiorham Park, NJ 07932

Subject: Request for Work Plan and HVOC Groundwater Analysis; Fuel Leak Case No. RO0000412 and Geotracker Global ID T0600101789, Chevron #9-1723; 9757 San Leandro Street, Oakland, CA 94603

Dear Ladies and Gentlemen:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Site Investigation Report*, and the *Third Quarter 2015, Semi-Annual Groundwater Monitoring Report*, both dated October 16, 2015. The documents were prepared and submitted on your behalf to ACEH and Geotracker by Stantec Consulting Services, Inc (Stantec). The referenced investigation report documented the installation of soil bores SB-24 to SB-34, and the resampling of existing vapor wells VP-1 to VP-5 at the site. Thank you for undertaking the work and submitting the reports. They provide further details regarding the site and will help move the case towards closure.

Utilizing the new data presented in the referenced reports, ACEH has re-evaluated site data to determine if the site is eligible for closure as a low risk site under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on the review, ACEH determined that the site additionally meets the Media-Specific Criteria for Direct Contact. ACEH has again determined that the site continues to fail to meet the LTCP General Criteria b (Petroleum Release Only), LTCP General Criteria f (Secondary Source Removal), and the Media-Specific Criteria for Groundwater, and the Media-Specific Criteria for Vapor Intrusion to Indoor Air.

Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below.

TECHNICAL COMMENTS

1. **LTCP Re-Evaluation** – To provide further details in regards to the LTCP re-evaluation conducted by ACEH the following analysis is provided.
 - a. **LTCP General Criteria b (Unauthorized Release Consists Only of Petroleum)** – The presence at the site of a first generation waste oil UST is not clear; however, the detection of Halogenated Volatile Organic Compounds (HVOCs) downgradient of well MW-8 (secondary gradient on to adjacent former Shell service station) has indicated that HVOC contamination may be located at the subject site. As previously requested, and as previously stated would occur in work plan addendum

responses (February 2015), ACEH requests the collection of HVOC groundwater analytical data from the site well network, on a minimum of a one-time basis.

- b. General Criteria f – Secondary Source Has Been Removed to the Extent Practicable** – At a minimum, secondary source appears to be present at the former dispenser islands characterized by soil bores SB-26 and SB-32. At the location of SB-26, elevated soil analytical concentrations as shallow as 2.5 feet below grade surface (bgs) are present (1,300 milligrams per kilogram [mg/kg] Total Petroleum Hydrocarbons as gasoline [TPHg], and benzene at 1.4 mg/kg at 2.5 feet bgs). Additionally, the laboratory noted the presence of “fuel” in the sample extract for sample SB-26-S-12.5, thus also indicating the presence of free phase product (FP) in soil at the location at a minimum.

The extent of secondary source, if any, at presumed former first generation offsite infrastructure locations has not been determined.

- c. LTCP Media Specific Criteria for Groundwater** – The referenced investigation report indicates that groundwater is not significantly affected by residual soil contamination as indicated by groundwater concentrations in existing site wells; however, ACEH remains concerned with the extent of plume delineation at the site. Grab groundwater collected at the locations of SB-28 and SB-31 appear to indicate elevated concentrations of TPHg of up to 4,100 micrograms per liter ($\mu\text{g}/\text{l}$) at the downgradient property line that appear to bypass the existing well network (between MW-2, with a slightly submerged screen, and well MW-9).

Additionally, an elevated grab groundwater TPHg concentration in soil bore SB-31, and an elevated grab groundwater TPH as diesel (TPHd) concentration in soil bore SB-32, suggests that the extent of soil or groundwater contamination associated with the former service station is not understood or defined to the southeast of the site along 98th Avenue. This may be of importance due to the presence of an underground storm drain culvert that the Oakland Museum of California has mapped beneath 98th Avenue that starts at Pippin Street and 98th Avenue and flows to the southwest. The storm drain discharges directly to an open water engineered channel and San Leandro Bay.

The presence of elevated secondary source beneath the former dispenser island that soil bore SB-32 was installed to investigate may, or may not, have biased grab groundwater concentrations at this soil bore; however, limited soil source appears to be present at the location of soil bore SB-31 to account for the elevated grab groundwater concentration at this location. If groundwater flows to the west as indicated in available documents, this location indicates potential contaminated soil to the east and offsite from the property.

To support this LTCP criterion, ACEH additionally requests that the results of the recent well survey be plotted on a figure in order to allow ACEH to quickly determine the location of vicinity privately owned water supply wells. This is requested to include all wells not documented to have been destroyed under permit (such as well P2, located within 100 feet of the property, and other deep water supply wells that have been reported for the immediate vicinity of the site), cathodic protection wells, or other deep well structures. It is not necessary to plot relatively shallow monitoring wells or other shallow vertical structures. Please be aware that well construction details are still considered private, but are in the process of being opened to the public; however, locations and addresses are not considered private.

- d. LTCP Media Specific Criteria for Vapor Intrusion to Indoor Air** – The referenced report documented soil vapor concentrations, collected at a depth of 5.5 feet bgs, of benzene that ranged between <3,600 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) to 120,000 $\mu\text{g}/\text{m}^3$, ethylbenzene, between <4,900 and 22,000 $\mu\text{g}/\text{m}^3$, naphthalene between <24,000 and <27,000 $\mu\text{g}/\text{m}^3$, and oxygen concentrations that ranged between 0.78 and 1.6 percent (%) beneath the site. The data indicates the site does not meet the LTCP Criteria for a commercial site lacking a bioattenuation zone.

The report also documented carbon dioxide between 22 and 30% (atmospheric concentration is 0.04%) and methane between 13 and 42% (the Lower Explosive Limit [LEL] is approximately 4.4 to 5%, while the Upper Explosive Limit [UEL] is approximately 15%).

At a minimum, these concentrations document the presence of significant vadose zone residual petroleum contamination at the site. The location of the vapor wells do not provide a level of

comfort in regards to immediately adjacent offsite buildings with respect to the potential for petroleum vapor intrusion or explosion hazards. This may affect both the commercial warehouse and cafeteria downgradient of the property line.

Additionally, to ensure open communication between all involved parties, please be aware that the current property owner has verbally indicated that the subject site may be subject to redevelopment, including residential redevelopment; however, has not provided a final determination.

- 2. Data Gap Investigation Work Plan and Focused Site Conceptual Model** – Please prepare a Data Gap Investigation Work Plan to address the technical comments listed above by the date identified below. Please support the scope of work in the Revised Data Gap Investigation Work Plan with a focused SCM and Data Quality Objectives (DQOs) that relate the data collection to each LTCP criteria. For example please clarify which scenario within each Media-Specific Criteria a sampling strategy is intended to apply to.

In order to expedite review, ACEH requests the focused SCM be presented in a tabular format that highlights the major SCM elements and associated data gaps, which need to be addressed to progress the site to case closure under the LTCP. Please sequence activities in the proposed revised data gap investigation scope of work to enable efficient data collection in the fewest mobilizations possible.

- 3. Groundwater Monitoring** – Please continue to conduct semi-annual groundwater monitoring at the site. As requested above, please include, on a minimum of a one-time basis, HVOC compounds in the well network at the site. Please submit semi-annual reports by the dates identified below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH 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 and schedule:

- **February 19, 2016** – Work Plan
File to be named: RO412_WP_R_YYYY-MM-DD
- **May 20, 2016** – Semi-Annual Groundwater Monitoring
File to be named: RO412_GWM_R_YYYY-MM-DD
- **November 11, 2016** – Semi-Annual Groundwater Monitoring
File to be named: RO412_GWM_R_YYYY-MM-DD

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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. Additionally, if your email address does not appear on the cover page of this notification, ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

If you have any questions, please call me at 510-567-6876 or send me an email at mark.detterman@acgov.org.

Sincerely,

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

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

Ladies and Gentlemen
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cc: Travis Flora, Stantec Consulting Services, Inc., 15575 Los Gatos Blvd, Los Gatos, CA 95032; (sent via email to travis.flora@stantec.com)

Peter Krasnoff, West Environmental Services & Technology, Inc, 711 Grand Avenue, Suite 220, San Rafael, CA 94901; (sent via email to peterk@westenvironmental.com)

Dilan Roe (sent via email to dilan.roe@acgov.org)

Mark Detterman (sent via email 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

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.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

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)	REVISION DATE: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
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

- **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) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, 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 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.