

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  
ALAMEDA, CA 94502  
(510) 567-6700  
FAX (510) 337-9335

October 18, 2017

Ms. Carryl MacLeod  
Chevron Environmental Management Company  
6101 Bollinger Canyon Road  
San Ramon, CA 94583  
(Sent via electronic mail to:  
[CMacleod@chevron.com](mailto: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 electronic mail to:  
[Jan@grebenlaw.com](mailto:Jan@grebenlaw.com))

Mr. Francis Meynard  
Pacific American Group  
104 Caledonia Street  
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(Sent via electronic mail to:  
[FMeynard@pacamgroup.com](mailto:FMeynard@pacamgroup.com))

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

Subject: Request for Soil Vapor Plume Delineation; Fuel Leak Case No. RO0000412 and Geotracker Global ID T0600101789, Chevron #9-1723; 9757 San Leandro Street, Oakland, CA 94603

Dear Ladies and Gentlemen:

Thank you for attending the teleconference call held on October 16, 2017, to discuss the subject site. The call discussed the 12 figures generated by Stantec Consulting Services, Inc. (Stantec) as a result of the August 22, 2017 meeting. The figures depicted Total Petroleum Hydrocarbons as gasoline (TPHg), benzene, ethylbenzene, and naphthalene concentrations in soil in the 0 to 5 and 5 to 10 foot depth zones, contoured the soil data in the 5 to 10 foot depth interval, correlated TPHg, benzene, ethylbenzene, and naphthalene concentrations in soil at 5 to 10 feet to vapor concentrations for each constituent, and correlated soil vapor concentrations of each constituent to groundwater concentrations, and on the last figure, Figure 12, proposed seven temporary soil vapor sampling locations to delineate the soil vapor plume.

Based on ACDEH staff review of the referenced documents, please submit a brief work plan incorporating the technical comments below to ACDEH for review and approval. The work plan can reference previously submitted and approved protocols for soil and soil vapor sampling. ACDEH requests the analytical data be tabulated and emailed to ACDEH, and the property owner, council, and consultant for discussion via a teleconference call on November 28, 2017, prior to the submittal of an investigation report and updated Site Conceptual Model (SCM).

We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org)) prior to the start of field activities.

### **TECHNICAL COMMENTS**

1. **Detailed Figure Review Comments** – As discussed in the October 16, 2017 meeting, the review of the 12 figures by ACDEH resulted in a number of questions which need to be resolved and discussed in the Site Investigation Report requested below. The questions include the following:
  - a. **Discussion of Rational to Exclude Analytical Data from Contouring** – A series of soil bores with analytical data was excluded from the contouring effort, and if included, modify the understanding of soil contamination at the site, especially along the western property line of the two parcels comprising the

site. Rational must be provided in the updated SCM requested below to exclude analytical data from contouring.

- b. Limited Naphthalene Contour Data Set** – The naphthalene soil analytical data is very limited, may not be representative of the site as a whole, and indicate the collection of additional naphthalene soil analytical data is warranted. Please collect at a minimum data from the soil vapor probe locations. ACDEH understands from the teleconference call on Oct. 16, 2017, Chevron is proposing to install probes at two depths, and thus naphthalene analytical data must be collected from both intervals.
- c. Inferred Contours** – Multiple, separated, contours have been included in a number of the contour maps for soil and groundwater data and imply small isolated plumes, rather than a potentially larger plume, sourced from a more widely spread contamination. See for example Figures 2, 4, 6, and 9. A comparison of Figure 9, depicting the extent of groundwater TPHg contamination in groundwater relative to soil vapor, to Figure 5 contained in the *First Semi-Annual 2017 Groundwater Monitoring Report*, dated April 28, 2017 (Stantec), is misleading, and the isolated plumes are likely not representative of the site as a whole. Please revise the figures to be more representative of groundwater conditions.
- d. Lack of a LTCP Bioattenuation Zone** – The subject site does not have a bioattenuation zone as defined by the Low Threat Closure Policy (LTCP) as concentrations of petroleum hydrocarbons greater than 100 milligrams per kilogram (mg/kg) are present in the 0 to 5 foot depth interval. It appears that contouring the 0 to 5 foot depth data is equally as useful for the installation of soil vapor probes to a depth of 5 to 5.5 feet below grade surface (bgs). Please revise the figures to also include the 0 to 5 foot depth interval data, in addition to the 5 to 10 foot depth on one figure for each contaminant.
- e. Mapped Infrastructure Locations** – Please include historic station infrastructure (i.e. USTs, piping, islands, etc.) on all maps, unless the maps become too cluttered. In this case, please separate the details on an identically scaled map.
- f. Proposed Soil Vapor Bore Locations** – Seven temporary vapor point locations were proposed on Figure 12 based on the data analysis contained in the preceding eleven figures. In general the locations appear reasonable; however, as discussed in the teleconference ACDEH requests the addition of a minimum of four additional locations. These locations are contained in the attached figure, and have been modified slightly to reflect teleconference call discussions. Initially, temporary, exploration-style, soil vapor probes are acceptable for the purpose of determining the lateral extent of the vapor plume; however, as noted in the teleconference call, ACDEH is requesting the identification of semi-permanent vapor probe locations based on the initial analytical result review (see below) for the purpose of determining temporal variations in vapor concentrations. As discussed in the teleconference call, ACDEH also requests that semi-permanent vapor probes be installed in offsite locations in San Leandro Street to evaluate whether multiple underground storage tanks (USTs) and other fueling infrastructure, have been removed, and presence of residual contamination offsite beneath San Leandro Street.
- g. Real-Time Step-Out Vapor Probe Locations** – The presence of a mobile laboratory allows for a contingency to step-out in real-time to define the lateral extent of the soil vapor plume. The ability to quickly contract an onsite laboratory remained an issue at the end of the call; however, ACDEH is in agreement that an onsite laboratory is appropriate, and will expedite delineation of the vapor plume.

If a mobile laboratory cannot be contracted by the compliance dates listed below, ACDEH requests analysis of soil vapor samples on an expedited time and quick remobilization (within a week) to install step-out vapor probes. This iterative process should be completed until the extent of the vapor plume is defined.

- 2. Soil Samples** – ACDEH requests that soil samples are collected from each soil vapor probe in order to understand contaminant distribution within the depth of the soil vapor probes (0 to 5, and 5 to 10, if probes greater than 5 feet are proposed to be installed). Please base sample collection on Photoionization Detector (PID) readings, staining, odor, or other indications of contamination. Please bias the samples to worst case samples.

3. **Analytical Suite** – Please analyze soil samples for TPHg, TPH as diesel (TPHd), benzene, toluene, ethylbenzene, total xylenes (BTEX), methyl tert butyl ether (MTBE), and naphthalene. Please analyze soil vapor by TO-15 and TO-17 (naphthalene). Please additionally include analysis for Halogenated Volatile Organic Compounds (HVOCs) due to the historic presence of HVOCs in groundwater at the site.
4. **Vapor Pressure Readings** – During the meeting the installation of a second bore adjacent to the proposed vapor probe locations was briefly discussed for the purpose of the collection of soil vapor at greater depths as well as pressure readings and other data. Please ensure the paired borings are installed at a sufficient distance from each other to prevent break through and cross communication.
5. **Permanent Vapor Probes** – The location of semi-permanent soil vapor probe locations will be dependent on the entire tabulated data set, and discussed in a teleconference call on the date identified below.
6. **Groundwater Monitoring** – Please continue semi-annual groundwater monitoring at the subject site. Additionally incorporate naphthalene into the analytical suite, and submit reports by the dates identified below.
7. **Industrial Water Supply Well** – Please include the previously requested evaluation of the screen interval of abandoned industrial water supply well P-2 and existing well screens monitoring shallow groundwater contamination associated with the subject site in a final report, whose submittal date has not yet been identified. Include a cross-section depicting the screen intervals in the SCM and report.
8. **Evaluation of Integrity of Pavement Surface** – Please include in a work plan the protocols for conducting a sweep of the asphalt or concrete surface at the site with FROG, or other, instrumentation on a grid sampling pattern in order to determine the presence of methane gas or other contaminants of concern at the surface.

#### **SUBMITTAL ACKNOWLEDGEMENT STATEMENT**

Please note that ACDEH has updated Attachment 1 with regard to report submittals to ACDEH. ACDEH will now be requiring a Submittal Acknowledgement Statement, replacing the Perjury Statement, as a cover letter signed by the Responsible Party (RP). 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 SWRCB's Geotracker Website.*

Please make this change to your submittals to ACDEH.

#### **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 and schedule:

- **October 27, 2017 – Second 2017 Semi-Annual Groundwater Monitoring Report**  
File to be named: RO412\_GWM\_R\_yyyy-mm-dd
- **October 30, 2017 – Soil Vapor Work Plan**  
File to be named: RO412\_WP\_R\_yyyy-mm-dd
- **Results Meeting; November 28, 2017; 1:00 to 3:00 PM** – Please distribute tabulated data, figures, and any other appropriate data, for review to stakeholders prior to a teleconference call to discuss the results of the initial soil gas sampling (Additional step-out vapor locations, semi-permanent vapor probe locations, etc.). ACDEH requests that all tables be tabulated showing any non-detectable concentrations as <x, rather than ND to facilitate an understanding of the reporting level with respect to Environmental Screening Levels (ESLs).
- **Installation of Step-Out / Semi-Permanent Vapor Locations; December 15, 2017**

- **January 29, 2018 – Site Investigation Report and SCM**  
File to be named: RO412\_SWI\_R\_yyyy-mm-
- **April 6, 2018 – First 2018 Semi-Annual Groundwater Monitoring Report**  
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, ACDEH 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](mailto:mark.detterman@acgov.org).

Sincerely,



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

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

Attachment 2 - Modified Figure 12

cc: Travis Flora, Stantec Consulting Services, Inc., 15575 Los Gatos Blvd, Los Gatos, CA 95032; (Sent via electronic mail to: [travis.flora@stantec.com](mailto:travis.flora@stantec.com))

Michael Balster, Chevron Corporation, 6001 Bollinger Canyon Road (T-3068), San Ramon, CA 94583; (Sent via electronic mail to: [michael.balster@chevron.com](mailto:michael.balster@chevron.com))

Peter Krasnoff, West Environmental Services & Technology, Inc, 711 Grand Avenue, Suite 220, San Rafael, CA 94901; (Sent via electronic mail to: [peterk@westenvironmental.com](mailto:peterk@westenvironmental.com))

Dilan Roe, ACDEH, (Sent via electronic mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))

Paresh Khatri, ACDEH; (Sent via electronic mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org))

Mark Detterman, ACDEH, (Sent via electronic mail to: [mark.detterman@acgov.org](mailto: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/](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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> December 1, 2016
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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.

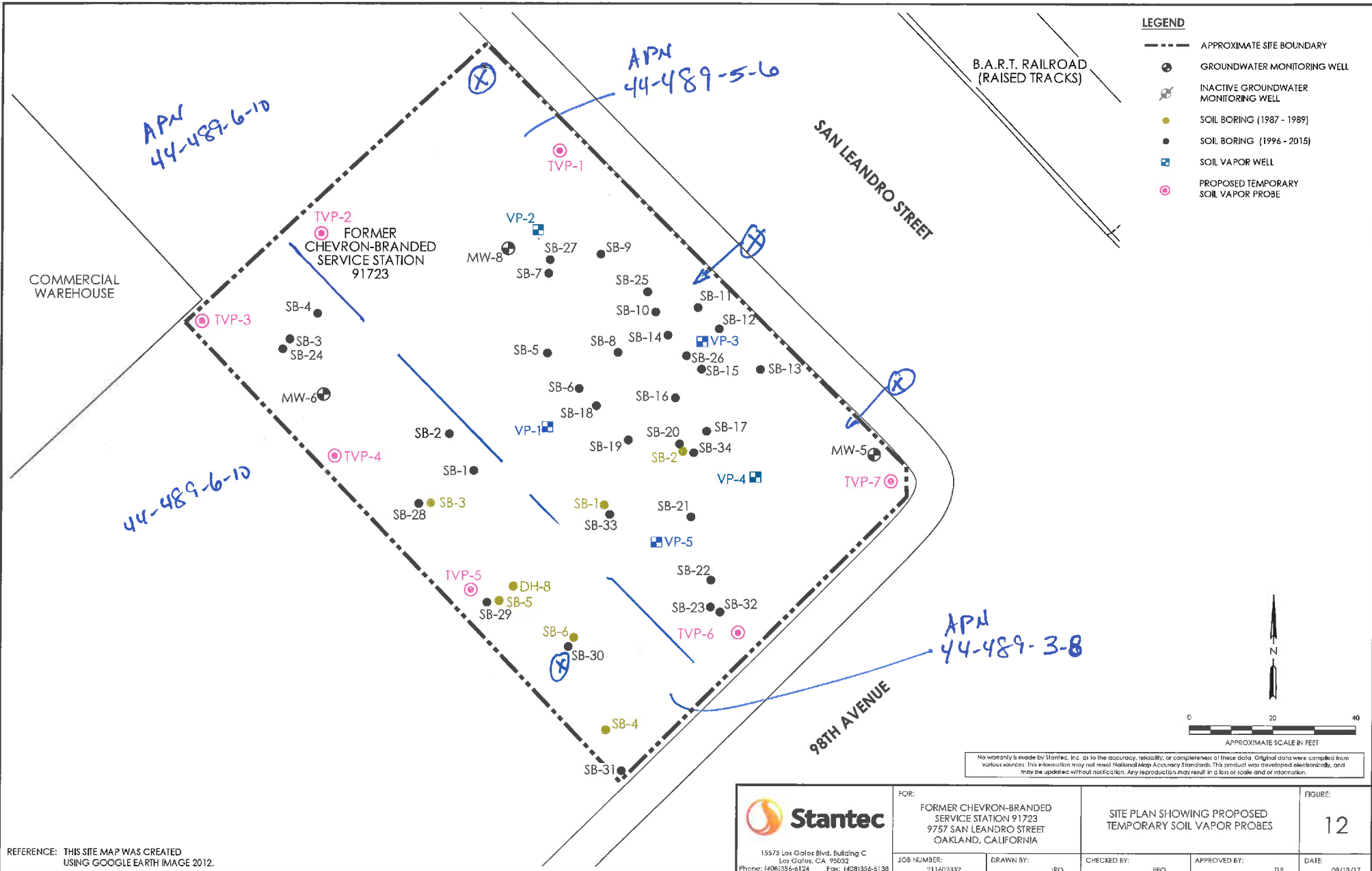
## REQUIREMENTS

- **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](mailto: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](mailto: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.



REFERENCE: THIS SITE MAP WAS CREATED USING GOOGLE EARTH IMAGE 2012.

<p>15575 Los Gatos Blvd, Building C Los Gatos, CA 95032 Phone: (408)356-6124 Fax: (408)356-6138</p>	FOR:	FORMER CHEVRON-BRANDED SERVICE STATION 91723 9757 SAN LEANDRO STREET OAKLAND, CALIFORNIA	SITE PLAN SHOWING PROPOSED TEMPORARY SOIL VAPOR PROBES	FIGURE:	12				
	JOB NUMBER:	211602332	DRAWN BY:	JRO	CHECKED BY:	EEO	APPROVED BY:	TLF	DATE: