



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

December 15, 2009

Terry Grayson (Sent via E-mail to: Terry.L.Grayson@contractor.conocophillips.com)
ConocoPhillips
76 Broadway
Sacramento, CA 95818

Thomas and Celine Vadakkekunnel
4481 Peacock Court
Dublin, CA 94568

Subject: Fuel Leak Case No. RO0000436 and Geotracker Global ID T0600101777, Unocal #4186, 1771 First Street, Livermore, CA 94550

Dear Mr. Grayson and Mr. and Ms. Vadakkekunnel:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted document entitled, "*Quarterly Summary Report – Second Quarter 2009*," dated July 21, 2009. The Quarterly Report presents the results from groundwater sampling conducted in June 2009 and includes summaries of the remediation status and characterization status. The Quarterly Report indicates that installation of additional ozone injection wells as well as upgrade of the existing ozone injection system is on hold pending the results of quarterly groundwater monitoring. This same has conclusion has been included in the past three quarterly groundwater monitoring reports. In previous correspondence dated December 12, 2008 regarding this issue, ACEH requested that a Work Plan for Ozone System Sparging Upgrade be submitted no later than May 11, 2009. A Work Plan for Ozone System Sparging has not been submitted to date.

We request that the evaluation of the ozone sparging system upgrade be completed and the Work Plan for Ozone System Sparging be submitted no later than February 24, 2010. For ease of reference, we have repeated the technical comments in our December 12, 2008 correspondence below. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1. **Ozone Sparging System.** Following review of groundwater monitoring data from new and existing wells during the First Quarter 2009, we request that you submit plans for improvement and upgrade of the ozone sparging system. The plans must include abandonment of sparge wells as previously proposed and installation of additional or replacement of existing sparge wells. In addition, we request that you review historical groundwater monitoring data, system operation data, and results from the oxygen injection testing conducted in 2007 and incorporate these results as necessary in the Work Plan for Ozone Sparging System Upgrade requested below.

2. **Remediation of TBA.** In the Work Plan for Ozone Sparging System Upgrade requested below, please include a discussion of the effectiveness of proposed improvements to the ozone sparging system on remediation of TBA. A review of historical groundwater monitoring data indicates that although some decreases in concentrations have been observed for TPHg, BTEX, and MTBE during the operation of the ozone sparging system, TBA concentrations have remained elevated. Please evaluate recalcitrance of the TBA to ozone sparging and discuss whether the proposed improved sparging system will be effective in treating dissolved TBA.
3. **Well Construction Details and Cross Sections.** The Work Plan for Ozone Sparging System Upgrade must include a table of well construction details for all new and existing wells that lists the depth, diameter, filter pack and screen intervals, and date of installation. We also request that you include one downgradient and one cross gradient cross section in the Work Plan for Ozone Sparging System Upgrade. Please update cross section A-A' which was previously presented in the "Additional Subsurface Assessment and Oxygen Injection Test Report," dated April 26, 2007 for use as the cross gradient cross section. Please construct a downgradient cross section similar to A-A' that extends approximately through SP-8, U-3, U-8, and U-4. Proposed sparge wells are to be included on the cross sections.
4. **Remediation Status.** The most recent groundwater monitoring report for the site entitled, "Quarterly Summary Report – Third Quarter 2008 and Sensitive Receptor Survey," dated October 20, 2008 discusses shutdown of the ozone sparging system in the Second Quarter 2007 to evaluate whether dissolved phase concentrations would rebound. It is not clear whether this evaluation of rebound occurred. Please include this evaluation in the Work Plan for Ozone Sparging System Upgrade requested below. The Remediation Status section of future groundwater monitoring reports must be clearer about current operational status of the system. More specifically, the Remediation Status section must state whether the system is currently active, the dates of operation, and reasons for the system being not active.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **February 10, 2010** – Semi-Annual Monitoring Report – Fourth Quarter 2009 (To include summary report, remedial performance summary, and quarterly monitoring report in one document)
- **February 24, 2010** – Work Plan for Ozone Sparging System Upgrade

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.swrcb.ca.gov/ust/cleanup/electronic_reporting).

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.

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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.

If you have any questions, please call me at 510-567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Danielle Stefani, Livermore Pleasanton Fire Department, 3560 Nevada St, Pleasanton, CA 94566
(Sent via E-mail to: dstefani@lpfire.org)

Cheryl Dizon (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551
(Sent via E-mail to: cdizon@zone7water.com)

James Barnard, Delta Environmental, 11050 White Rock Road, Suite 110, Rancho Cordova, CA 95670 (Sent via E-mail to: JBarnard@deltaenv.com)

Donna Drogos, ACEH (Sent via E-mail to: donna.drogos@acgov.org)
Jerry Wickham, ACEH

Geotracker, File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: March 27, 2009
	PREVIOUS REVISIONS: December 16, 2005, October 31, 2005
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

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

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

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 dehloptoxic@acgov.org
 - Or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of My Le Huynh.
 - 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 and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - 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 dehloptoxic@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.