Carryl MacLeod
Project Manager, Marketing Business Unit

April 27, 2017

RECEIVED
By Alameda County Environmental Health 1:42 pm, Apr 28, 2017

Alameda County Department of Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Re: Former Chevron Service Station No. 92029
890 West MacArthur Blvd.
Oakland, California
ACEH Case RO0002438

Dear Mr. Detterman

This letter is in response to your email dated April 20, 2017 (Attachment A) in which Alameda County Department of Environmental Health (ACDEH) requested a meeting to discuss the next steps relating to the above referenced Site and the recently issued State Water Board Resources Control Board (SWRCB) Review Summary Report (Attachment B). Based on Chevron Environmental Management Company's (CEMC) review of the Review Summary Report (RSR), the SWRCB identified the Site did not meet the Low-Threat Underground Storage Tank (UST) Case Closure Policy (LTCP) media-specific criteria for petroleum vapor intrusion to indoor air. SWRCB further states the "Responsible Party should address all appropriate building design requirements and implement necessary engineering controls to meet the Policy Vapor Intrusion to Indoor Air Criteria, and evaluate the risk of vapor intrusion at offsite properties if necessary."

In addition to the request for a meeting, ACDEH identified four (4) items to be brought to the meeting (included in quotes below). CEMC has reviewed these items and provides a response in italics.

"VaporBlock Plus VBP20 has been proposed to be used a vapor barrier beneath the site. Based on a review of the product specifications, ACDEH is uncertain that it is a suitable vapor intrusion barrier, rather than a moisture barrier from water containing dilute concentrations of volatile organic compounds. Please bring documentation of its approval by either the San Francisco Bay Regional Water Quality Control Board (RWQCB) or the Department of Toxic Substances Control (DTSC) for use at other sites in Alameda County area to the meeting."

RWQCB and/or DTSC do not endorse or approve specific vapor barrier products or brands. CEMC understands that Mr. Itgel is working with the RWQCB to obtain their input on the use of VaporBlock Plus VBP20 for his construction plans

"Review of the plan set uploaded to the ACDEH ftp site and to GeoTracker indicates that is dated March 2007, and the plan sheet with the VaporBlock Plus VBP20 located beneath select sections is dated July 2016. As a consequence, the plan sets are not current and are not complete. Please upload a current COMPLETE plan set to both the ACDEH ftp site and to GeoTracker, and bring a full set to the meeting. Please ensure the vapor mitigation system has been incorporated into the full plan set."

CEMC understands that Mr. Itgel will provide a hard copy of the latest building plans during the upcoming meeting. In addition, a copy has been uploaded to GeoTracker and the ACDEH ftp site.

"To the understanding of ACDEH, the nature (type and environmental quality) of the backfill material used at the site has not been documented. ACDEH will not be able to approve closure for a residential redevelopment without understanding the nature of the backfill material. If documentation of the type and environmental quality of the backfill material has been documented, please bring the documentation to the meeting."

In the Remedial Excavation Report submitted by Cambria, dated July 6, 2005, Cambria documented that the excavation was backfilled and compacted with "clean engineered fill." The compaction report included in the report states that the drain rock and base rock was imported from Syar Industries Quarry located in Vallejo. In addition,

Chevron Environmental Management Company
6001 Bollinger Canyon Road, San Ramon, CA 94583
Tel 925 842 3201
CarrylMacLeod@chevron.com

during the 2015 site assessment, soil samples collected from boring SB-13 from within the fill material did not have any detections of constituents of concern, as documented in the Site Redevelopment Analysis and Request for Closure, dated July 7, 2016.

"Prior to the meeting, ACDEH requests that at an absolute minimum, the depth to water in ALL wells is measured. If there is sufficient time, the collection and laboratory testing of groundwater samples from ALL wells prior to the meeting will assist in moving the site closure and redevelopment faster. Due to the significant rainy season, ACDEH requests the site revert to a semi-annual basis for groundwater monitoring and sampling. Thus the collection of groundwater is requested to be conducted no later than early May 2017. Please ensure this is done. You may use this email as documentation of this request from ACDEH for reimbursement purposes."

Given the quantity of data already collected, well established data trends in Site wells since 2002, as well as Site conditions meeting Low-Threat Closure Groundwater-Specific criteria as presented in the SWRCB RSR (Attachment B), CEMC sees no reason to perform further monitoring and sampling at this Site.

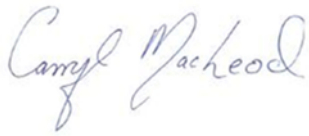
In addition to these four requests from ACDEH, CEMC would like to point out that the potential for vapor intrusion off Site, as mentioned in the RSR, has already been addressed. In the *Site Redevelopment Analysis and Request for Closure*, dated July 7, 2016, Stantec states, "Using current and historical soil and groundwater data, off-Site soil and groundwater conditions meet LTCP petroleum vapor intrusion to indoor air criteria scenario #3, because concentrations of dissolved benzene are less than 100 µg/L in groundwater, depth-to-groundwater is greater than 5 feet bgs, and concentrations of TPH in off-site soil are less than 100 mg/kg from 0 to 10 feet bgs."

As CEMC has addressed all of ACDEH's concerns within its control, CEMC respectfully declines ACDEH's request for a meeting. The remaining action items pending resolution are related specifically to finalization of the appropriate building design/construction requirements and implementation of the necessary engineering controls. These items should be addressed directly with Mr. Itgel. CEMC understands that Mr. Itgel will participate in the meeting on May 8th, 2017.

CEMC proposes that the redevelopment occur in a phased approach and requests that ACDEH provide notification to the City of Oakland planning department to allow Mr. Itgel to proceed with the redevelopment permitting process. In the meantime, CEMC proposes to prepare a site management plan to address residual petroleum hydrocarbon impacts encountered during redevelopment.

If you have any questions, please do not hesitate to contact me at (925) 842-3201 or cmacleod@chevron.com.

Sincerely,



Carryl MacLeod
Project Manager

Attachments:
A – April 20, 2017, ACDEH request for a meeting
B – State Water Resources Control Board Review Summary Report

Cc:
GeoTracker
Mr. Buyandalai Itgel, (via email)
Dilan Roe, Alameda County Department of Environmental Health (via email)
Mr. Kirk Larson, State Water Resources Control Board (via email)
Mr. Pat Cullen, State Water Resources Control Board (via email)
Travis Flora, Stantec (via email)
Gigi Zuo, Chevron Environmental Management Company (via email)

Attachment A

MacLeod, Carryl G

From: Detterman, Mark, Env. Health <Mark.Detterman@acgov.org>
Sent: Thursday, April 20, 2017 2:42 PM
To: MacLeod, Carryl G; GATHCONSTRUC@AOL.COM; SOKANECONST@HOTMAIL.COM; teamspirit74@yahoo.com
Cc: Roe, Dilan, Env. Health; 'Flora, Travis'
Subject: [**EXTERNAL**] Meeting Request 890 West MacArthur, Chevron Station 92029; RO2438

Carryl, Alex, and all,
In order to discuss the next steps at the subject site, Alameda County Department of Environmental Health (ACDEH) is requesting a meeting in our office. Specifically this is to discuss the development schedule timing, data gaps for closure, the proposed vapor mitigation system, and possible remediation at the site. Data gaps include the risk of vapor intrusion at onsite and offsite locations, within the context of the Low Threat Closure Policy (LTCP), as well as within the context of the planned residential redevelopment at the site. The recently issued Review Summary Report (RSR) from the State Water Board (SWB) indicates the SWB and ACDEH are in agreement that the risk of vapor intrusion at onsite and offsite locations remains a data gap and concern.

To help move the discussions at the meeting along, ACDEH requests that the following be brought to the meeting:

- VaporBlock Plus VBP20 has been proposed to be used a vapor barrier beneath the site. Based on a review of the product specifications, ACDEH is uncertain that it is a suitable vapor intrusion barrier, rather than a moisture barrier from water containing dilute concentrations of volatile organic compounds. Please bring documentation of its approval by either the San Francisco Bay Regional Water Quality Control Board (RWQCB) or the Department of Toxic Substances Control (DTSC) for use at other sites in Alameda County area to the meeting.
- Review of the plan set uploaded to the ACDEH ftp site and to Geotracker indicates that is dated March 2007, and the plan sheet with the VaporBlock Plus VBP20 located beneath select sections is dated July 2016. As a consequence, the plan sets are not current and are not complete. Please upload a current COMPLETE plan set to both the ACDEH ftp site and to Geotracker, and bring a full set to the meeting. Please ensure the vapor mitigation system has been incorporated into the full plan set.
- To the understanding of ACDEH, the nature (type and environmental quality) of the backfill material used at the site has not been documented. ACDEH will not be able to approve closure for a residential redevelopment without understanding the nature of the backfill material. If documentation of the type and environmental quality of the backfill material has been documented, please bring the documentation to the meeting.
- Prior to the meeting, ACDEH requests that at an absolute minimum, the depth to water in ALL wells is measured. If there is sufficient time, the collection and laboratory testing of groundwater samples from ALL wells prior to the meeting will assist in moving the site closure and redevelopment faster. Due to the significant rainy season, ACDEH requests the site revert to a semi-annual basis for groundwater monitoring and sampling. Thus the collection of groundwater is requested to be conducted no later than early May 2017. Please ensure this is done. You may use this email as documentation of this request from ACDEH for reimbursement purposes.

In regards to potential meeting dates, the following dates and times are currently available:

Monday May 8, 4 – 6 pm
Tuesday May 9, 10 – 12 am
Thursday May 11, 10 – 12, and 4 – 6
Friday May 12, 11 – 5:30 (2 hour spot)

Please let me know which will work for your group. Meeting dates and times can and do disappear quickly as all open times are open to others.
Please keep me posted.
Thank you,

Mark Detterman
Senior Hazardous Materials Specialist, PG, CEG
1131 Harbor Bay Parkway
Alameda, CA 94502
Direct: 510.567.6876
Fax: 510.337.9335
Email: mark.detterman@acgov.org

PDF Copies of case files can be downloaded at:
http://www.acgov.org/aceh/lop/ust.htm

Attachment B

State Water Resources Control Board

REVIEW SUMMARY REPORT – ADDITIONAL WORK
FIRST REVIEW – MARCH 2017

Case Information

Cleanup Fund (Fund) Claim No.: 19167	GeoTracker Global ID: T0600173887
Site Name: Chevron #9-2029	Site Address: 890 MacArthur Blvd. Oakland, CA 94608
Responsible Party: Chevron Environmental Management Company Attn: Alexis Fischer	Address: 6101 Bollinger Canyon Road San Ramon, CA 94583
Fund Expenditures to Date: $0	Number of Years Case Open: 19
Fund Budget Category: Corrective Action Plan/Remediation	

Agency Information

Agency Name: Alameda County Environmental Health Department (County)	Address: 1131 Harbor Bay Parkway Alameda, CA 94502
Agency Caseworker: Mark Detterman	Case No.: RO0002438

Consultant History

Consultant: Stantec	Registered Professional Signatory: Dorota A. Runyan, P.E.
Years: 2012 - Present	Office Phone: 651-255-3962
Consultant: GHD	Registered Professional Signatory: Scott McLeod
Years: 2005 - 2012	Office Phone: 510-420-0700

To view all public documents for this case available on GeoTracker use the following URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0600173887

Summary

The Low-Threat Underground Storage Tank (UST) Case Closure Policy (Policy) contains general and media-specific criteria, and cases that meet those criteria are appropriate for closure pursuant to the Policy. This case does not meet all of the required criteria of the Policy. Highlights of the case follow:

This Site is a former commercial petroleum fueling facility and currently a fenced-off vacant lot under site redevelopment. An unauthorized release was reported in February 1997. Approximately 5,135 tons of impacted soil were excavated and disposed offsite in 2005 during the removal of the UST system. Reportedly, 25,500 gallons of contaminated groundwater water were removed during tank excavation. No additional active remediation has been conducted. Since 2002, eight groundwater monitoring wells have been installed and monitored; four wells have been abandoned. According to groundwater data, water quality objectives have been achieved or nearly achieved for all constituents except in the source area.

The petroleum release is limited to the soil and shallow groundwater. According to data available in GeoTracker, there are no public water supply wells or surface water bodies within 1,000 feet of the projected plume boundary. No other water supply wells have been identified within 1,000 feet of the projected plume boundary in files reviewed. According to GeoTracker there are no nearby or impacted wells. The unauthorized release is located within the service area of a public water system, as defined in the Policy. The affected shallow groundwater is not currently being used as a source of drinking water, and it is highly unlikely that the affected shallow groundwater will be used as a source of drinking water in the foreseeable future. Other designated beneficial uses of impacted groundwater are not threatened, and it is highly unlikely that they will be, considering these factors in the context of the site setting.

Rationale for Closure under the Policy

- General Criteria: The case meets all eight Policy general criteria.
- Groundwater Specific Criteria: The case meets Policy Criterion 1 by Class 4. The contaminant plume that exceeds water quality objectives is less than 1,000 feet in length. There is no free product. The nearest water supply well or surface water body is greater than 1,000 feet from the projected plume boundary. The maximum dissolved concentrations of benzene and methyl tert-butyl ether (MTBE) are each less than 1,000 micrograms per liter (µg/L).
- Vapor Intrusion to Indoor Air: The case does not meet Policy criteria onsite and potentially offsite because the maximum benzene concentration in groundwater is greater than 100 µg/L.
- Direct Contact and Outdoor Air Exposure: The case meets Policy Criterion 3a. Maximum concentrations in soil are less than those in Policy Table 1 for Commercial/Industrial use, and the concentration limits for a Utility Worker are not exceeded. During proposed site redevelopment, it is possible excavation and construction crews may encounter petroleum contaminated soil. Any construction crew performing subsurface work will be prepared to deal appropriately with environmental hazards anticipated or encountered in their normal daily work. The presence of residual contamination should be taken into account when issuing and executing excavation or building or other permits at the Site, including but not limited to the inclusion of a Competent Person in the work crew. Following site redevelopment, the Site is expected and required to meet residential direct contact goals.

Update Status of Communications

In a teleconference on December 28, 2016 between County staff and State Water Board staff, County staff expressed concern regarding the potential for soil vapor intrusion on and offsite. State Water Board staff concurs with the County that the Site does not meet Vapor Intrusion to Indoor Air Policy criteria. State Water Board staff concurs that the Responsible Party should address all appropriate building design requirements and implement necessary engineering controls to meet the Policy Vapor Intrusion to Indoor Air criteria, and evaluate the risk of vapor intrusion at offsite properties if necessary. Once these issues are resolved, this case should be re-reviewed under the Policy for closure.

3/2/17

Kirk Larson, P.G. Date
Engineering Geologist
Technical Review Unit
(916) 341-5663

Pat G. Cullen 3/21/17

Pat G. Cullen, P.G. Date
Senior Engineering Geologist
Chief, Technical Review Unit
(916) 341-5684

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