

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**  
AGENCY  
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-93

November 10, 2008

Mr. Tom Bauhs  
Chevron Environmental Management Company  
P.O. Box 6012, K2204  
San Ramon, CA 94583

Ms. Julie Beck Ball  
Mr. Peter Reinhold Beck  
2720 Broderick Street  
San Francisco, CA 94123

Subject: SLIC Case No. RO0002466 and Geotracker Global ID T06019744728, Park Street Landing  
2301-2337 Blanding Avenue, Alameda, CA 94501

Dear Mr. Bauhs and Ms. Ball:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above referenced site including the recently submitted document entitled, "*Site Investigation Report*," dated October 14, 2008 and prepared on Chevron's behalf by Conestoga-Rovers Associates. The Site Investigation Report presents the results of soil, soil vapor, and groundwater sampling conducted at the site to further evaluate the extent of petroleum hydrocarbons in shallow groundwater, evaluate whether VOCs are present in the vicinity of the former paint storage area and boat yard, evaluate the extent of elevated metals concentrations in soil, and perform soil vapor sampling to evaluate potential vapor intrusion.

Based on our review of the Site Investigation Report and the case file, additional evaluation of the site is required. Most significantly, elevated concentrations of VOCs have been detected in soil vapor samples collected adjacent to the on-site buildings. We request that you submit a Work Plan to conduct sub-slab soil vapor and/or indoor air sampling to directly and quickly evaluate potential vapor intrusion. Please submit a Work Plan that addresses the technical comments below **by December 19, 2008**.

**TECHNICAL COMMENTS**

1. **Soil Vapor Sampling Results.** Elevated concentrations of total petroleum hydrocarbons as gasoline (TPHg) and volatile organic compounds (VOCs) were detected in soil vapor samples collected from vapor wells installed adjacent to two of the on-site buildings. The highest concentration of benzene (1,100,000 micrograms per cubic meter [ $\mu\text{g}/\text{m}^3$ ] detected in a sample from probe SV-4) exceeds the Environmental Screening Level (ESL) for soil vapor under industrial/commercial land use by more than three orders of magnitude. Chloromethane and bromomethane were also detected in the soil vapor sample from SV-4 at concentrations that exceed the ESL for vapor intrusion by more than an order of magnitude. In addition, coarse-grained soils consisting of sands and gravels are described in shallow soil at each of the soil vapor probes. All soil vapor samples were considered to pass the leak detection test and the analytical results are assumed to be valid. Based on the highly elevated concentrations of VOCs in soil vapor, further investigation of potential vapor intrusion consisting of

sub-slab sampling and/or indoor air sampling is required. Please refer to the December 15, 2004 DTSC Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air to help plan the additional investigation. We request that you present plans for further assessment of potential vapor intrusion in the Work Plan requested below. Further assessment should include re-sampling of the existing soil vapor probes.

2. **Evaluation of Shallow Groundwater.** In correspondence dated October 17, 2007, we questioned the representativeness of the groundwater monitoring data for well MW-1 and requested additional sampling of shallow groundwater in the area of well MW-1. Two shallow groundwater samples were proposed in the area of well MW-1 (SB-17 and SB-18). TPHg, TPHd, and benzene were detected in the grab groundwater sample from boring SB-18 at concentrations of 3,800, 19,000, and 590 µg/L. The concentrations detected in the grab groundwater sample from SB-18 are significantly higher than the concentrations detected in groundwater from MW-1. This further indicates that the data collected from well MW-1 may not accurately reflect shallow groundwater quality at the site and also indicates that fuel hydrocarbons are likely discharging to the Alameda Canal. Unfortunately, a groundwater sample was not collected from boring SB-17. As shown on cross section A-A', the water level in well MW-1 is approximately 3 feet MSL. Boring SB-17, which is located approximately 30 feet from MW-1, was advanced to an elevation of 9 feet below MSL but no groundwater was reportedly encountered. In the Work Plan requested below, please present plans to accurately monitor groundwater quality at the site and discharges to the Alameda Canal.
3. **Metals in Soil and Groundwater.** Based on the sampling results for metals in soils, we concur with the conclusion that no further investigation for metals in soils is required at this time. However, the elevated concentrations of metals detected in shallow soil to date will require land use restrictions to prevent exposure under more future more conservative land use scenarios. Although metals were not detected at elevated concentrations in a groundwater sample from well MW-1, the representativeness of data from well MW-1 is questionable. Therefore, please include analyses for metals in groundwater in the plans to accurately monitor groundwater quality at the site and discharges to the Alameda Canal as requested in technical comment 2.
4. **Former Paint Storage Area.** Based on the results from soil boring SB-14, we concur that the former paint storage area does not appear to be a source of soil or groundwater contamination. No further investigation of the paint storage area is required at this time.
5. **Buried Drum Excavation.** In response to our request for further information, we received a technical report in March 2008 entitled, "*Soil Investigation and Remediation*," dated April 1995 and prepared by Geomatrix. The report describes excavation of soil containing petroleum hydrocarbons and polynuclear aromatic compounds in the area of a buried drum near the eastern corner of the site. The Geomatrix report recommended investigation of shallow groundwater to evaluate whether groundwater has been affected by chemicals associated with the underground drum. We did not find a record of groundwater sampling in this area of the site. In the Work Plan requested below, please include plans to assess whether groundwater quality has been impacted in the area of the excavated drum.

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6. **Hydrogeologic Cross Section.** The hydrogeologic cross sections are useful for interpretation of site conditions. ACEH appreciates the preparation of the hydrogeologic cross sections for the Site Investigation Report.

### **TECHNICAL REPORT REQUEST**

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

- **December 19, 2008** – Work Plan

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](http://www.swrcb.ca.gov/ust/cleanup/electronic%20reporting)).

### **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.

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**PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS**

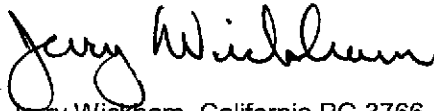
The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For 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.

**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](mailto: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: Mr. Brian Carey, Conestoga-Rovers & Associates, 2000 Opportunity Drive, Suite 110  
Roseville, CA 95678

Mr. James Kiernan, Conestoga-Rovers & Associates, 2000 Opportunity Drive, Suite 110  
Roseville, CA 95678

Mr. Monroe Wingate, C/o Alan Wingate, 18360 Carriger Road, Sonoma, CA 95476

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>ISSUE DATE:</b> July 5, 2005
	<b>REVISION DATE:</b> December 16, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, 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](mailto:dehloptoxic@acgov.org)  
or
  - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
- 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](mailto: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 at acgov.org. (e.g., [firstname.lastname@acgov.org](mailto: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)