

C A M B R I A

Alameda County February 18, 2005
MAR 10 2005
Environmental Health

Mr. Robert Schultz
Alameda County Environmental Health Services (ACEHS)
1131 Harbor Bay Parkway
Alameda, CA 94502

Re: **Addendum to Additional Investigation Workplan
Based on ACEHS Letter of November 15, 2004**
Former Chevron SS #9-0261 (Site #304291)
3884 First Street
Livermore, California
Cambria Project No. 31E-2036



Dear Mr. Schultz:

On behalf of ChevronTexaco Environmental Management Company (Chevron), Cambria Environmental Technology, Inc. (Cambria) has prepared this addendum to the *Additional Investigation Workplan*, submitted to your office September 21, 2004, and the addendum of October 28, 2004, for the site referenced above. The objective of this investigation is to characterize conditions resulting from Chevron's past operations and determine what, if any, liability Chevron retains at the site. This addendum is in response to your letter of November 15, 2004 requesting modification to the previously submitted documents. A copy of your letter is attached for reference. Your concerns are addressed below in the order stated presented in your letter.

1) Locations of Previous Investigation Borings


Your letter questions how accurately field location of borings advanced in December 1999 can be determined. A site visit has revealed that no new asphalt has been laid down since the borings and the remnants of the grouted borings are still visible. It also appears from that site visit that curb cuts and landscape planters shown on Chevron's 1971 "Demolition" site plan have not been modified. From these "permanent" site features measurements were made to accurately place the December 1999 borings on Figure 2 of the workplan. The use of Chevron's site plans, the permanent site features and field measurements enabled us to accurately plot the previous borings and suggest locations for borings for this current investigation. Aerial photos were of minimal value due to their scales, except to verify the accuracy of Chevron's site plans.

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2) Rationale for Sampling Strategy



Sample collection from soil borings planned for this investigation will be based on visual observations as well as instrument screening with a photoionization detector (PID). Boring locations were selected based on site plans provided by Chevron showing facility locations during both site configurations. Geoprobe sampling provides a continuous core of subsurface material, assuming complete core recovery. Depending on the boring location, whether addressing the former USTs, piping runs or dispenser islands, cored material will be scrutinized to document and retain samples from appropriate depths. This will be done to document conditions based on the specific type of potential source (shallow – piping, dispensers, deeper – USTs). As stated in the original workplan, Chevron safety protocols require hand or vacuum clearance of the first eight feet of all borings. During the clearance of these borings, “disturbed” samples will be collected at appropriate depths to document conditions near surface, specifically with respect to former piping runs and dispenser islands.

Based on information provided in response No. 1, the plotted locations of borings B-2 and B-3 do not coincide with any of the former fueling system components. If the 1971 Demolition Plan accurately labels the station building, then boring B-2 appears to reside within the original station building. The three proposed borings located around each of these 1999 borings are intended to confirm and further define the occurrence of total recoverable petroleum hydrocarbons (TRPH) and total petroleum hydrocarbons as motor oil (TPHmo). Appropriate samples will be collected and analyzed to further the understanding of the occurrence of these hydrocarbons.

As we have discussed with you, it is our intent to advance the geoprobe borings to depths sufficient to investigate potential hydrocarbon impact to groundwater from either service station, or other, site activities. Per our conversation, to the extent feasible, we will advance borings to depths sufficient for collecting grab groundwater samples for analysis.

3) Groundwater Elevation

Information reported from previous investigations suggested that groundwater in the vicinity of the site would be encountered at a depth of approximately 60 feet below grade (fbg). In light of this, potential impacts to groundwater were considered minimal and, as stated in the workplan, it was planned to continue soil borings to a minimum of 10 feet below evidence of hydrocarbon impacts. With the hydrograph of well 3S/2E 9Q4 (located approximately ¾ mile distant) provided by the ACEHS indicating current regional groundwater depths ranging from 10-20 fbg, geoprobe borings will be advanced to within the saturated zone and, as stated above, grab groundwater samples will be collected to investigate possible hydrocarbon impacts to water beneath the site. In the event that groundwater beneath the site is deeper than suggested by the hydrograph, the borings will be advanced, as conditions allow, to and into the saturated zone.

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4) Soil Sampling Locations

Cambria will acquire an encroachment permit from the City of Livermore and advance an additional boring to investigate the first generation dispenser island location underlying First Street.

5) Chemical Analyses



Retail gasoline sales and service station operations ceased at this site no later than 1975. This is a maximum of three years after the development of the compound MTBE which records indicate was in 1972. It is, therefore, very unlikely that MTBE would be found in gasoline dispensed from this site. However, as Alameda County has required sample analysis for the presence of MTBE, this will be done.

6) Well Survey

Per your request, Cambria will provide copies of DWR driller's reports for wells identified in the October 7, 2004 Area Well Survey. Due to ambiguous location descriptions documented on drillers reports, actual well locations will be provided to the degree possible. The well survey is being conducted at this time. However, in the interest of thoroughness and accuracy, we wish to submit it under separate cover. The Area Well Survey addendum will be completed and submitted during the week of February 28.

7) Quarterly Status Reporting

Cambria is conducting this phase of investigation at the request of ChevronTexaco to determine what degree, if any, Chevron retains liability for conditions beneath the site. The responsibility for submittal of Quarterly Status Reports will be determined after the results of this investigation are evaluated.

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The objective of this investigation is to document conditions beneath the site in soil and, potentially, groundwater, associated with Chevron's former operations and to further define the occurrence of "heavy hydrocarbons" reported in the document titled *Preliminary Subsurface*

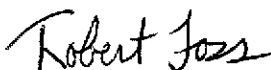
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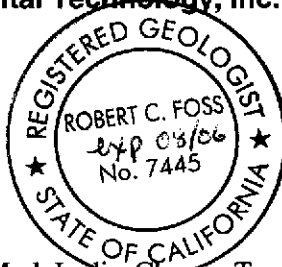
Investigation Report, Thomas Edwards and Associates, December 1999. Cambria and Chevron will evaluate the data generated during this investigation and will recommend additional actions, if necessary.

One additional modification to the original workplan is as follows. Information originally provided to ChevronTexaco by Ms. Sandi Nichols, an attorney with Stoel Rivas LLP (written communication to ChevronTexaco, June 21, 2004), stated that Standard Oil Company had leased the property for service station operations beginning in 1945. A 1939 aerial photo shows the original service station configuration. This was interpreted as the station facilities having been constructed and operated by others for a minimum of six years prior to Standard Oil's lease and operations on the property. This misinformation was corrected with further review of Chevron records which indicated that the lease with Coast Manufacturing Company began in 1936, rather than 1945. Based in this, it appears that no storage or retailing of gasoline motor fuels were conducted on the site prior to Standard Oil's operations.

We feel that this correspondence should adequately address the concerns expressed in your November 15 letter. Please note that Mr. Mark Inglis has assumed management oversight for Chevron of this, and all other Alameda County projects previously managed by Ms. Karen Streich. Mr. Inglis can be contacted at (925) 842-1589. Please feel free to contact me at (510) 420-3348 if you have any questions or comments regarding this addendum.

Sincerely,
Cambria Environmental Technology, Inc.


Robert Foss, P.G.
Associate Geologist



cc: Mr. J. Mark Inglis, ChevronTexaco, P.O. Box 6012, San Ramon, CA 94583
Ms. Sandi L. Nichols, Stoel Rives, 111 Sutter Street, Suite 700, San Francisco,
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Mr. Jon Robbins, ChevronTexaco, P.O. Box 6012, San Ramon, CA 94583
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