Chevron

Global Gas

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January 14, 2008

Mr. Jerry Wickham
Department of Environmental Health
Alameda County Health Agency
1131 Harbor Bay Parkway
Alameda, California 94502

Dear Mr. Wickham:

I declare, under penalty of perjury, that the information and/or recommendations contained in URS' letter titled "**SLIC Case No. RO0002892, Chevron Sunol Pipeline, 2793 Calaveras Road, Sunol, CA – Response to ACEH November 29, 2007 Letter – Request for Time Extension and Further Clarification Regarding Restart Up of SVE System**" are true and correct to the best of my knowledge at the present time.

Submitted by:

Jeffrey Cosgray
Chevron Pipe Line Company

URS

January 15, 2008

Mr. Jerry Wickham
Department of Environmental Health
Alameda County Health Agency
1131 Harbor Bay Parkway
Alameda, California 94502

Subject: SLIC Case No. RO0002892, Chevron Sunol Pipeline, 2793 Calaveras Rd, Sunol, CA
Response to ACEH November 29, 2007 Letter – Request for Time Extension and Further Clarification Regarding Restart Up of SVE System

Dear Mr. Wickham:

URS on behalf of Chevron Pipeline Company (CPL) is responding to Alameda County Environmental Health (ACEH)'s letter of November 29, 2007 on the CPL site near Sunol, California.

SYNOPSIS OF ALAMEDA COUNTY LETTER OF NOVEMBER 29, 2007

In the November 29, 2007 letter to CPL, ACEH, agreed with the discontinuation of monitoring activities and the closure of monitoring wells MW-5 through MW-7. ACEH also agreed to require further assessment with regard to the installation of secondary monitoring wells only if the newly installed monitoring wells showed gasoline impacts. The ACEH letter also requested restarting of an SVE system at the site by January 29, 2008 and incorporating SVE-8 into that system.

REPLY TO ALAMEDA COUNTY LETTER OF NOVEMBER 29, 2007

SVE System Restart Up

Please note that in the August 2007 report, URS informed ACEH of our intent to shut down the SVE system and disassemble the system piping to facilitate the safe removal of the dead trees on the steep hillside. Also, in accordance with the report recommendations, URS prepared a letter to the ACEH which described the system shut down procedures, presented mass removal data and evaluated the practicality of future system operation.

CPL and URS do not concur that continued operation of an SVE system is critical to achieving the remediation goals at the site. We believe that the remediation goals for this site should be the protection of groundwater. The following points demonstrate the progress made toward achieving these goals:

- The impacted soil has been delineated.

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- Ongoing migration of gasoline contaminants from the source area appear to be minimal based on the limited number of gasoline contaminant impacted wells (MW-1, MW-8, and MW-9).

- Data collected to date indicates that groundwater flow from the source area in the hillside through the Valley Crest Tree Company (VCTC) property across Calaveras Road is minimal.

- The local alluvium underling the VCTC portion of the site does not to fit within a Source of Drinking Water definition as described by the State Water Resources Control Board (SWRQB) Resolution 88-63 (SWRCB, 2006).

- The encountered bedrock at the site effectively acts as a groundwater barrier preventing or minimizing the downward migration of potential contaminants. URS drilled approximately 70 feet into this underlying rock and found no water- bearing zones within the sandstone.

- The groundwater contaminant plume has been effectively delineated and will continue to be monitored for changes in conditions.

- Monitoring wells MW-10 and MW-11 were sampled December 14, 2007 with analytical results for total petroleum hydrocarbons as gasoline (TPH-g) and benzene, ethylbenzene, toluene, and xylenes (BTEX) below the laboratory reporting limits.

- Sampling results of Alameda Creek tributaries have been below laboratory detection limits.

Nonetheless, preparations to restart an SVE system (if required) will be conducted. If ACEH decides an additional SVE system is required, we would like to take this opportunity to suggest performance criteria.

We propose an SVE remediation goal of less than 3 pounds per day (lbs/day) removed per SVE well. At the close of our previous SVE operations on August 17, 2007, each of the SVE wells SVE-1D, SVE-2S, SVE-3S, SVE-4D, and SVE-9 was below the proposed remediation goal of 3 lbs/day.

All SVE wells remain in place at the site and have had well boxes installed to protect against falling tree limbs. Furthermore, the piping utilized with the first SVE system has been safely secured at the site.

Incorporation/Replacement of SVE-8 into a New SVE System

Technical Comment 1 in the ACEH letter suggests incorporating SVE-8 into a replacement SVE system during the dry season. Technical Comment 1 further suggests,

as noted above, the installment and continued operation of a replacement SVE system. The following discussion addresses these comments and/or suggests alternatives.

Reply to ACEH Comment on SVE-8

During both wet and dry season conditions, URS observed perched groundwater at approximately 3 feet bgs in SVE-8. The high water level in the well caused the SVE piping to freeze, causing the SVE system to shut down during winter 2006. At that time, URS disconnected the well from the system and continued to check the water level. Water levels in SVE-8 have remained consistent throughout the wet and dry seasons. Concerns remain that a replacement well for SVE-8, installed in the same area, would face the same issues. URS will evaluate options for utilizing the existing SVE-8, if an SVE system is restarted.

Conclusion

Based on the discussions above, URS respectfully requests ACEH reconsider the restarting of an SVE system and continued soil remediation activities. URS propose the following actions, regardless of the restarting of an SVE system.

- Continue to monitor the groundwater and surface water on a quarterly basis and report our results to ACEH.
- Continue to install sorbent booms in wells MW-1 and MW-9 on an as needed basis.
- Proceed with closure of monitoring wells MW-5 through MW-7, once tree removal occurs.

Schedule

URS believes the SVE system restarting, operation, and reporting required by ACEH by January 29, 2008 is an unobtainable goal and likely not possible, in that time frame, for the following reasons:

- URS, at the request of CPL, has begun researching the use of carbon technology. If the SVE system must be restarted, this change is required in order to eliminate the high rate of propane consumption in the old system due to reduced influent concentrations.

- URS believes the electrical needs of the new system type can be fulfilled by the local electrical utilities, requiring a connection to an existing overhead electrical cable be requested and established. The timing of obtaining such a connection is uncertain.

- The new system type would require Bay Area Air Quality Management District (BAAQMD) permitting.

- The current site conditions, due to unresolved tree removal issues, are unsafe for the restarting of an SVE system at this time. January 2008 photographs of the trees are attached.

URS respectfully requests an extension for any future SVE site work. A Workplan will be submitted to ACEH for upcoming remediation activities by January 29, 2008.

If you have questions, please do not hesitate to contact me at (510) 874-3201.

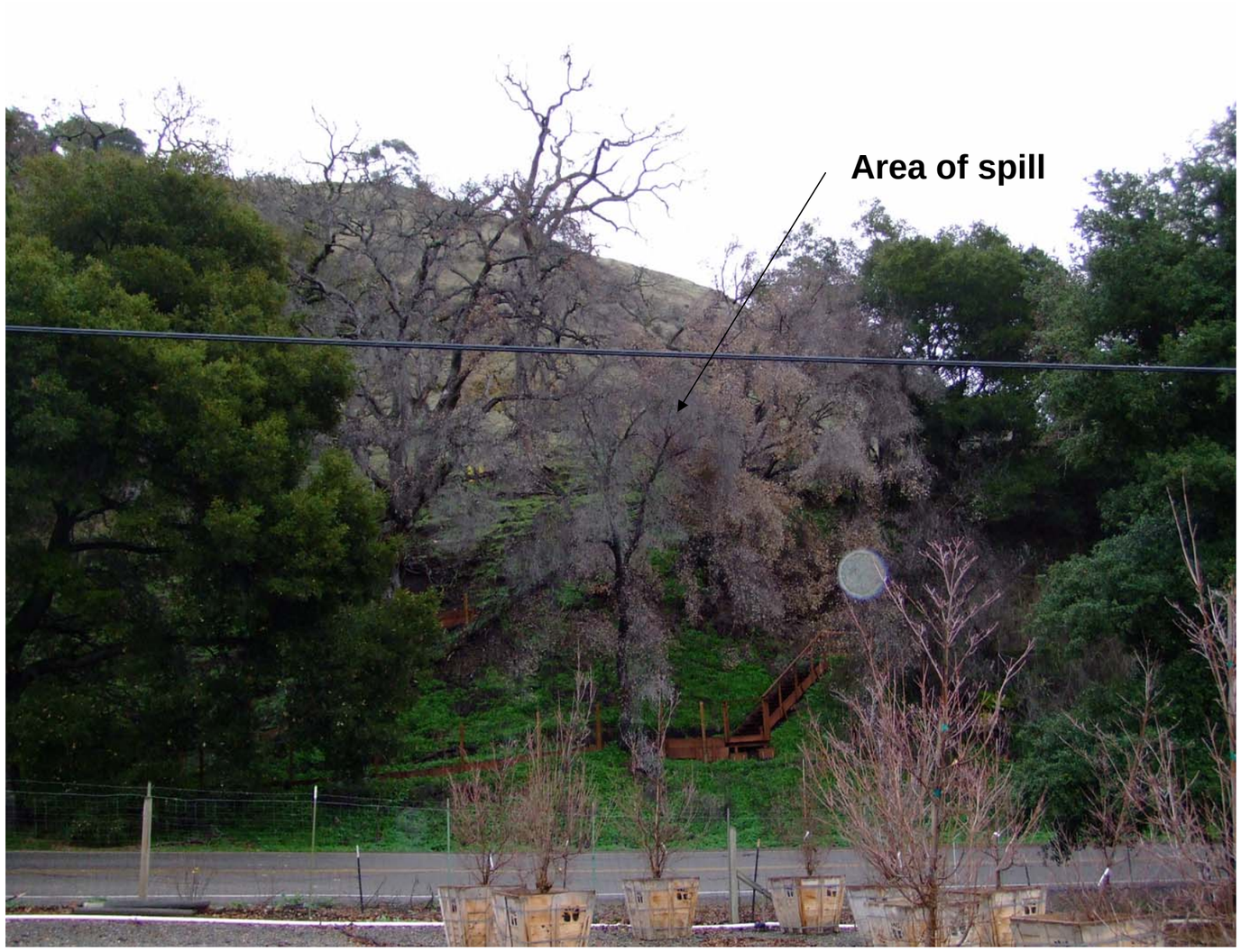
Sincerely,

URS CORPORATION

Joe Morgan
Project Manager

Jacob Henry
Senior Geologist

cc: Mr. Jeffrey Cosgray, CPL


Area of spill


Walk way to SVE wells


Approx. location of SVE-8