

#### **RECEIVED**

2:28 pm, Feb 15, 2008

Alameda County Environmental Health Global Gas

Jeff Cosgray

Health, Environmental & Safety Remediation Team Leader Chevron Pipe Line Company 4800 Fournace, E320C Bellaire, Texas 77401-2324 Tel 713 432 3335 Fax 866 653 0301 JCOS@Chevron.com

February 15, 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 February 1, 2008 Letter – SVE System Schedule" are true and correct to the best of my knowledge at the present time.

Submitted by

Jeffrey Cosgray

Chevron Pipe Line Company



February 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 February 1, 2008 Letter – SVE System Schedule

Dear Mr. Wickham:

URS on behalf of Chevron Pipeline Company (CPL) is responding to Alameda County Environmental Health (ACEH)'s letter of February 1, 2008 on the CPL site near Sunol, California.

# Synopsis and Reply to Alameda County Letter of February 1, 2008

In the February 1, 2008 letter to CPL, ACEH, required the restarting of a Soil Vapor Extraction (SVE) system by May 1, 2008 and requested an SVE system schedule be submitted by February 15, 2008. Furthermore, ACEH requested well SVE-8 be incorporated into the SVE system. Lastly, ACEH does not agree with the proposed effluent vapor concentrations as an SVE system remediation goal. ACEH suggested the use of a US. EPA guidance document (EPA/600/R-01/070, September 2001) to evaluate SVE system closure. The proposed site remediation goal was not addressed.

### **Tree Removal**

Please note the following facts:

- The removal of the system piping and the protection of the existing wells was/is a requirement for the safe removal of the trees.
- The dismantling of the system provided a natural break point for the evaluation of the SVE system. This evaluation was proposed in the August 2007 report to ACEH and discussed at our May 26, 2007 meeting.
- If the evaluation had determined that the system would not continue, the safest option for the tree removal would have been to allow their natural decay.
- The SVE system cannot be re-installed until the trees are removed.

CPL and URS have impeccable safety records to date at the Sunol site and are very concerned about the removal of the large trees from a steep hillside. CPL and URS have gone to great lengths to protect the health and safety of all personnel who visit the site. Our efforts include building extensive stair ways on the very steep hillside. CPL and URS will strive to meet the required ACEH goals, including restarting an SVE system.



Mr. Jerry Wickham Alameda County Environmental Health Chevron Pipeline Company Sunol, CA Site Page 2 of 2

CPL is not responsible for the removal of trees due to the damage caused to the pipeline by a third party. SFPUC, the landowner, and lessor, Cronin Ranches, will be requested to perform the tree removal. Past discussions with SFPUC have indicated rather long lead times for this activity. Our site activities can only resume upon the completion of this task.

CPL and URS propose a meeting at the site so ACEH can observe, firsthand, the health and safety concerns shared by CPL and URS.

As progress is made, URS will adjust and notify ACEH of the new schedule.

## **Remediation Options**

In addition, to ACEH's request to CPL to restart an SVE system, in the interim until the trees are removed, CPL and URS are in the process of evaluating other, more efficient configurations/remedial options.

## **Legal Options**

CPL is currently pursuing involvement of the party responsible for the pipeline rupture. If deemed appropriate, CPL will request that ACEH name the party as a responsible party (RP) and involve them in future decisions concerning the project.

#### Schedule

CPL and URS are determined to work together in order to meet the deadlines set forth by ACEH. However, URS believes committing to a firm schedule at this point, is not possible due to the unknown factors, such as those discussed above. As decisions are made on how to best proceed, URS will update ACEH on the proposed schedule. URS will provide monthly updates to ACEH starting March 15, 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