

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



*out
8-27-06*

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

August 18, 2006

Mr. Jeff Cosgray
Chevron Pipe Line Company
2811 Hayes Road, Room 1366C
Houston, TX 77082-6696

Subject: SLIC Case RO0002892, Chevron Sunol Pipeline, 2793 Calaveras Road, Sunol, CA

Dear Mr. Cosgray:

Our records indicate that the current balance on the above-referenced SLIC oversight account is a negative \$930.60. In order to continue to provide regulatory oversight, we are requesting the submittal of a check made payable to Alameda County Environmental Health in the amount of \$3,000.00. Please send your check to the attention of our Finance Department.

This initial deposit may or may not be sufficient to provide all necessary regulatory oversight. ACEH will deduct actual costs incurred based upon the hourly rate specified below. If these funds are insufficient, additional deposit will be requested. Otherwise, any unused monies will be refunded to you or your designee.

The deposit is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project is being debited at the Ordinance specified rate, currently \$166.00 per hour.

Please write "SLIC" (the type of project), the site address, and AR# 0314746 on your check.

If you have any questions, please contact Jerry Wickham at (510) 567-6791.

Sincerely,


Ariu Levi
Division Chief

cc: D. Drogos, J. Jacobs, Jerry Wickham

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
7-31-06

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

July 27, 2006

Mr. Jeff Cosgray
Chevron Pipe Line Company
4800 Fournace Place
Bellaire, TX 77401-2324

Subject: SLIC Case No. RO0002892, Chevron Sunol Pipeline, 2793 Calaveras Road, Sunol, CA - Work Plan Approval

Dear Mr. Cosgray:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site and the document entitled, "Work Plan for Groundwater Monitoring Well Installation and SVE System Expansion and Operation," dated July 26, 2006 and received by ACEH on July 27, 2006. The Work Plan was prepared on your behalf by URS Corporation and proposed the installation of two additional groundwater monitoring wells, installation of five additional SVE wells on the hillside adjacent to the release, continued operation of the SVE system, developing SVE shutdown criteria, and assessing SVE system effectiveness. We concur with the proposed scope of work presented in the Work Plan.

We request that you perform the proposed work and send us the reports described below.

TECHNICAL REPORT REQUEST

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

- **August 15, 2006** – Quarterly Monitoring Report for the Second Quarter 2006
- **October 27, 2006** – SVE System Start-up Report
- **December 4, 2006** – Groundwater Monitoring Well Installation and Quarterly Monitoring Report for the Third Quarter 2006

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

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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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.

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.

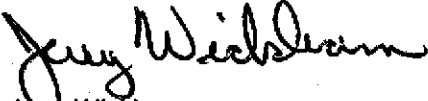
AGENCY OVERSIGHT

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.

Jeff Cosgray
July 27, 2006
Page 3

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Joe Morgan III, URS Corporation, 1333 Broadway, Suite 800, Oakland, CA 94612

Joe Naras, San Francisco Public Utilities Commission, Natural Resources Division,
1657 Rollins Road, Burlingame, CA 94010

Matt Katen, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway,
Livermore, CA 94551

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
07-17-06

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
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July 14, 2006

Mr. Jeff Cosgray
Chevron Pipe Line Company
4800 Fournace Place
Bellaire, TX 77401-2324

Subject: SLIC Case No. RO0002892, Chevron Sunol Pipeline, 2793 Calaveras Road, Sunol, CA

Dear Mr. Cosgray:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site and the document entitled, "Response to ACEH June 5, 2006 Letter – Technical comment 1. Gravel layer as Preferential Pathway," dated July 10, 2006. The correspondence was prepared on your behalf by URS Corporation and recommends that monitoring wells not be installed within the shallow gravel zone along Calaveras Road. The technical comments below provide our responses to the correspondence.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

- 1. Hypothesis Regarding Groundwater in the Gravel Layer.** The URS correspondence concludes that since groundwater was not observed at the time of drilling in January that groundwater would not be present in the future to collect a representative sample and goes on to conclude that "groundwater appears to be present for very limited periods of time, if at all." The two hypotheses that groundwater is: 1) present at very limited times or 2) not at all, could be tested by the installation of a well in the gravel layer. If groundwater is observed in the gravel layer for short periods during the year, the hypothesis that groundwater is present at very limited times would be confirmed and the mass of contaminants being transported through the migration pathway could be roughly estimated based on the duration of flow and concentration of hydrocarbons in the groundwater. If groundwater is not observed at any time in a well in the gravel layer, the hypothesis that groundwater is not present "at all" would be confirmed. If groundwater never moved through the gravel layer, the observed impact to the gravel layer is likely the result of free phase product flow that affected approximately three feet of the gravel layer above the bedrock (as observed in boring MW-5). This information would also be useful in understanding past and future contaminant migration.
- 2. Benefit from Monitoring Groundwater East of Well MW-1.** The URS correspondence states, "Because the locations of the requested borings/wells are between the source area and MW-1 (located approximately 80 feet to the west), it is unclear if any benefit would be gained in monitoring a zone that lies in the middle of the impacted area." This statement appears to be contradictory to widely accepted guidance documents on placement of

monitoring wells at hazardous waste sites, which recommend the placement of wells within a plume or directly downgradient from a source to identify the distribution of contaminant concentrations and monitor contaminant flux from the source area. Well MW-1 is approximately 185 feet west of the source and on the opposite side of a postulated fault from the source. The proposal to monitor the source using only data from well MW-1 is unacceptable.

3. **Requested Groundwater Monitoring Well Installation for Gravel Layer.** We request that you install a minimum of one well (adjacent to MW-5) to monitor the gravel layer above bedrock to address technical comments 1 and 2 or propose an alternative approach to monitor and estimate contaminant flux from the source area to groundwater using sampling locations in addition to well MW-1. Please note the additional request in our June 8, 2006 correspondence to monitor contaminant migration in groundwater along the sloping bedrock surface west of Calaveras Road. Please present your proposals in the Work Plan requested below.

TECHNICAL REPORT REQUEST

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

- **July 26, 2006** – Proposal for SVE System Expansion and Operation
- **August 11, 2006** – Work Plan for Additional Subsurface Investigation
- **August 15, 2006** – Quarterly Monitoring Report for the Second Quarter 2006

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

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locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was 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).

PERJURY STATEMENT

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PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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AGENCY OVERSIGHT

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If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

Jeff Cosgray
July 14, 2006
Page 4

cc: Joe Morgan III, URS Corporation, 1333 Broadway, Suite 800, Oakland, CA 94612

Joe Naras, San Francisco Public Utilities Commission, Natural Resources Division,
1657 Rollins Road, Burlingame, CA 94010

Matt Katen, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway,
Livermore, CA 94551

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
06-06-06

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
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(510) 567-6700
FAX (510) 337-9335

June 5, 2006

Mr. Jeff Cosgray
Chevron Pipe Line Company
4800 Fournace Place
Bellaire, TX 77401-2324

Subject: SLIC Case No. RO0002892, Chevron Sunol Pipeline, 2793 Calaveras Road, Sunol, CA

Dear Mr. Cosgray:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site and the document entitled, "Additional Subsurface Investigation Report, Chevron Sunol Pipeline Release, Sunol, California," dated May 22, 2006. The report was prepared on your behalf by URS Corporation and discusses site investigation activities conducted from January 17 through January 31, 2006. The report presents recommendations regarding the operation of the soil vapor extraction (SVE) system, quarterly monitoring, and free product recovery. In correspondence dated March 14, 2006, ACEH requested that the SVE system be expanded into the area downslope from the release. Logistical issues related to the steepness of the hillside have prevented the installation of SVE wells on the hillside. The issues related to possible expansion of the SVE system were discussed during a meeting conducted on May 26, 2006 between Jeff Cosgray (Chevron Pipe Line Company), Joe Morgan (URS), Greg White (URS), Angela Liang (URS), Ariu Levi (ACEH), Donna Drogos (ACEH), and myself. ACEH believes that continued operation of the SVE system without the addition of SVE wells on the hillside would not address a significant long-term source of contamination at the site. Based on discussions during the May 26, 2006 meeting, Chevron and URS will conduct further evaluation of the feasibility of potential technologies that will allow the installation of SVE wells on the slope.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Gravel Layer as Preferential Pathway.** ACEH concurs with the finding in Section 4 of the "Additional Subsurface Investigation Report," that the gravel zone near the top of the bedrock on the hillside and apparently continuing to the west across Calaveras Road, is a preferential pathway. The gravel zone appears to be a preferential pathway for contaminant movement from perched zones beneath the hillside to the shallow gravel zone west of Calaveras Road where free product has been observed intermittently in well MW-1. Monitoring wells MW-5 through MW-7, which were planned to monitor the water table at the top of the bedrock, were screened entirely within sandstone bedrock 10 to 15 feet below the gravel zone and therefore do not monitor this preferential pathway. Although groundwater was not encountered in the gravel layer during installation of wells MW-5 through MW-7, the gravel layer appears to act as a preferential pathway for groundwater and contaminant migration, at least seasonally. In

order to monitor potential contaminant migration within the gravel layer, we request that monitoring wells be installed within the gravel layer at the base of the hillside east of Calaveras Road. Please present plans for well installation in the Work Plan requested below. Please also consider the potential for the fault/unconformity identified along Calaveras Road to affect groundwater and contaminant movement.

2. **Groundwater and Contaminant Migration West of Calaveras Road.** The "Additional Subsurface Investigation Report," concludes that groundwater contamination does not extend as far west as MW-3 and MW-4. We concur that wells MW-3 and MW-4 appear to be properly installed to monitor groundwater contamination at the top of the bedrock and that groundwater contamination does not appear to extend west to these wells. A bedrock surface that slopes to the east and northeast in this area is presumed to be influencing groundwater movement within the unconfined water-bearing zone west of Calaveras Road (Figure 10). Therefore, we request that you install a minimum of one additional monitoring well in a location northeast of MW-1 on the west side of Calaveras Road to monitor contaminant movement along the sloping bedrock surface.
3. **Cross Section D-D' on Figure 7.** On cross section D-D', please correct the length of the screen interval for MW-5 to 10 feet rather than 25 feet in future reports. In addition, please correct the label in the upper left corner to D rather than D'.
4. **Quarterly Groundwater Monitoring.** Please collect groundwater samples from all monitoring wells and the unnamed creek on a quarterly basis. We concur with the proposed analyses for total petroleum hydrocarbons as gasoline and benzene, toluene, ethylbenzene, and xylenes.
5. **Expansion of the SVE System.** We have no objection to continued operation of the existing SVE system. However, as we stated in our March 14, 2006 correspondence, the area downslope of the release has been significantly affected by the release and the SVE system must be expanded to remove the mass of hydrocarbons downslope from the release. We previously requested a Work Plan by May 2, 2006 to install additional SVE wells downslope from the release and continue operations of the SVE system. In follow-up to the discussions during our May 26, 2006 meeting, we now request that you submit a proposal to expand the SVE system by July 26, 2006.

TECHNICAL REPORT REQUEST

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

- **July 14, 2006** – Proposal for SVE System Expansion and Operation
- **August 11, 2006** – Work Plan for Additional Subsurface Investigation
- **August 15, 2006** – Quarterly Monitoring Report for the Second Quarter 2006

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.

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PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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AGENCY OVERSIGHT

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If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

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Joe Naras, San Francisco Public Utilities Commission, Natural Resources Division,
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Matt Katen, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway,
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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SWT
05-10-06

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

May 9, 2006

Mr. Jeff Cosgray
Chevron Pipe Line Company
4800 Fournace Place
Bellaire, TX 77401-2324

Subject: SLIC Case No. RO0002892, Chevron Sunol Pipeline, 2793 Calaveras Road, Sunol, CA

Dear Mr. Cosgray:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including a memorandum entitled, "Re: SLIC Case No. RO0002892, Chevron Sunol Pipeline, 2793 Calaveras Road, Sunol, CA" dated April 18, 2006 and received by ACEH on May 4, 2006. The memorandum was prepared on your behalf by URS Corporation and discusses the feasibility of installing soil vapor extraction (SVE) wells on the hillside downslope from the release location. Due to technical difficulties and safety concerns, the memorandum concludes that it is not feasible to install one or more new SVE wells on the hillside downslope from the release location.

The alternative options for installing SVE wells discussed in the memorandum appear to be rejected by URS based on a cursory analysis. Therefore, we request that you provide an independent engineering evaluation of the feasibility of installing SVE wells on the steep hillside. The independent engineering evaluation is to be performed by a professional engineer outside the current project team who is familiar with limited access drilling methods. The evaluation is to provide a more in-depth discussion of alternatives than contained in the URS memorandum and is to address the technical comments below.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Horizontal Drilling.** Horizontal drilling appears to be rejected because drilling horizontally from Calaveras Road would not allow the advancement of a boring close enough to boring CP-SB-19 and construction of a sand pack would be difficult due to borehole collapse. Site maps indicate that boring CP-SB-19 is approximately 50 feet from Calaveras Road. It is not clear why a horizontal well at the site would be limited to a length of less than 50 feet from Calaveras Road and why borehole collapse would prevent construction of a horizontal well at the site. Please address these issues in your independent engineering evaluation. In addition, please discuss the potential for horizontal drilling from the road at the top of the slope, which was not considered in the memorandum.

2. **Limited Access Vertical Drilling.** URS does not recommend vertical access drilling based on safety concerns. The memorandum appears to consider a location in the steepest part of the slope in the area of boring CP-SB-19. Please review any alternate locations that are more feasible and provide an analysis of safety concerns for limited access vertical drilling in your independent engineering evaluation. Please see comment 4 regarding the steepness of the slope.
3. **SVE Trench Installation.** The URS memorandum indicates that a backhoe could not be staged on the dirt road, "to dig a long and deep enough trench to accommodate an effective SVE removal effort." Damage to reseeding efforts and potential damage to the buried pipeline were also cited as reasons that trenching was not feasible. Given the current limited configuration of SVE wells on the road, this analysis is insufficient. Please expand the analysis of the potential for SVE trench installation in the independent engineering evaluation.
4. **Percent Slope.** The memorandum indicates that the hillside below the pipeline release is an 84-percent slope. Cross section A-A' (URS, December 15, 2005) indicates that the hillside downslope from the release has a rise of approximately 54 feet over a distance of approximately 100 feet. In your independent engineering evaluation, please comment on the accuracy of citing an 84-percent slope for the site.

TECHNICAL REPORT REQUEST

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

- **May 22, 2006** – Additional Subsurface Investigation Report
- **July 9, 2006** – Independent Engineering Evaluation of the Feasibility of Installing SVE Wells Downslope from the Pipeline Release
- **August 15, 2006** – Quarterly Monitoring Report for the Second Quarter 2006

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.

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In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at jerry.wickham@acgov.org.

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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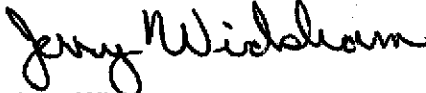
AGENCY OVERSIGHT

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Jeff Cosgray
May 9, 2006
Page 4

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Joe Morgan III, URS Corporation, 1333 Broadway, Suite 800, Oakland, CA 94612

Joe Naras, San Francisco Public Utilities Commission, Natural Resources Division,
1657 Rollins Road, Burlingame, CA 94010

Matt Katen, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway,
Livermore, CA 94551

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
03-15/06

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

March 14, 2006

Mr. Jeff Cosgray
Chevron Pipe Line Company
2811 Hayes Road, Room 1366C
Houston, TX 77082-6696

Subject: SLIC Case No. RO0002892, Chevron Sunol Pipeline, 2793 Calaveras Road, Sunol, CA

Dear Mr. Cosgray:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site and the document entitled, "Interim Remediation Report, Soil Vapor Extraction System for the Chevron Pipe Line Release Location, Sunol, California," dated February 28, 2006 and received by ACEH on March 6, 2006. The report was prepared on your behalf by URS Corporation and discusses the design and operation a soil vapor extract (SVE) system and the sampling results for the system. The report also presents recommendations to operate the SVE system for an additional two months. Based on the fuel hydrocarbon mass removal achieved using the SVE technology, ACEH concurs with the recommendation to continue operation of the SVE system. As discussed in technical comment 1 below, ACEH requests that the system be expanded into the area downslope from the release. Please submit a Work Plan to expand the SVE system and continue SVE operations by **May 10, 2006**.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Expansion of the SVE System.** The SVE system is to be expanded to include SVE wells downslope from the release. The SVE system has achieved significant mass removal using the four SVE wells located along the road, north and south of the release location, but does not include any wells downslope from the release. The downslope area to the west has been significantly affected by the release. The highest concentrations of fuel hydrocarbons detected in soil at the site were detected in boring CP-SB-19, which is directly downgradient from the release. In order to recover more of the mass of hydrocarbons released from the site, the SVE system must be expanded to remove hydrocarbons downslope from the release. Please submit a Work Plan by May 2, 2006 to install additional SVE wells downslope from the release and continue operations of the SVE system.

TECHNICAL REPORT REQUEST

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

- **April 15, 2006** – Quarterly Monitoring Report for the First Quarter 2006
- **May 10, 2006** – Work Plan for SVE System Expansion and Operation
- **May 22, 2006** – Additional Subsurface Investigation Report

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

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at jerry.wickham@acgov.org.

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.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

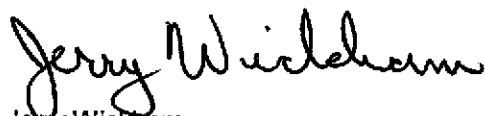
The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For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

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

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Livermore, CA 94551

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
01-23-06

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

January 20, 2006

Mr. Jeff Cosgray
Chevron Pipe Line Company
2811 Hayes Road, Room 1366C
Houston, TX 77082-6696

Subject: SLIC Case No. RO0002892, Chevron Sunol Pipeline, 2793 Calaveras Road, Sunol, CA
– Work Plan Approval

Dear Mr. Cosgray:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site and the document entitled, "Work Plan for Additional Investigation Activities, Chevron Sunol Pipeline Site, 2793 Calaveras Road, Sunol, California," dated January 19, 2006, prepared on your behalf by URS Corporation. The Work Plan proposes a scope of work that includes five additional soil borings/monitoring wells. ACEH has reviewed the Work Plan and concurs with the proposed scope of work.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Cross Sections.** The cross sections presented in the Subsurface Investigation Report dated December 15, 2005 were useful aids for the interpretation of site conditions. Please use data from the proposed additional borings to supplement or update the cross sections. Please present the cross sections in the Additional Subsurface Investigation Report requested below.

TECHNICAL REPORT REQUEST

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

- **March 2, 2006** – Interim Remediation Report
- **April 15, 2006** – Quarterly Monitoring Report for the First Quarter 2006
- **May 20, 2006** – Additional Subsurface Investigation Report

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

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at jerry.wickham@acgov.org.

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.

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,

Jeff Cosgray
January 20, 2006
Page 3

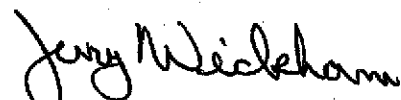
and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

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.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

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Joe Naras, San Francisco Public Utilities Commission, Natural Resources Division,
1657 Rollins Road, Burlingame, CA 94010

Matt Katen, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway,
Livermore, CA 94551

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



sent
01-08-20

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

December 30, 2005

Mr. Jeff Cosgray
Chevron Pipe Line Company
2811 Hayes Road, Room 1386C
Houston, TX 77082-6696

Subject: SLIC Case No. RO0002892, Chevron Sunol Pipeline, 2793 Calaveras Road, Sunol, CA

Dear Mr. Cosgray:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site and the report entitled, "Subsurface Investigation Report, Chevron Pipeline Release, Sunol, California," dated December 15, 2005, prepared on your behalf by URS Corporation. The report describes the results of four phases of investigation conducted at the site since a gasoline release occurred on August 14, 2005. The results indicate that gasoline from the pipeline release is present in soil and groundwater within the area of the release, the hillside below the release, and the tree nursery located on the west side of Calaveras Road. Total petroleum hydrocarbons as gasoline (TPHg) were detected in soil at concentrations up to 17,000 milligrams per kilogram (mg/kg) and were detected in groundwater at concentrations up to 570,000 micrograms per liter ($\mu\text{g/L}$).

The extent of fuel hydrocarbons in the subsurface has not been fully defined. Therefore, we request that you prepare a Work Plan by **February 23, 2006** to fully define the horizontal and vertical extent of contamination at the site. In addition, the free product and elevated concentrations of fuel hydrocarbons in soil and groundwater across a large area of the site will require cleanup. We request that you provide information on interim remediation activities conducted to date and present recommendations for future interim remediation by **March 2, 2006**.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Delineation of Soil and Groundwater Contamination.** The extent of shallow soil contamination appears to be sufficiently defined throughout most of the site. However, the horizontal and vertical extent of deeper soil and groundwater contamination has not been fully defined. Please present plans to fully define the extent of soil and groundwater contamination in the Work Plan requested below.
2. **Free Product Distribution and Recovery.** Free product has been observed in well MW-1, which is approximately 80 feet west of Calaveras Road and approximately 175 feet west of the release location. Highly elevated TPHg concentrations that may be indicative of free

phase product in the surrounding soils, have also been detected in grab groundwater samples in the area of the release. Based on these observations, free product appears to be present over a relatively wide area. We request that you present plans in the Work Plan requested below to define the extent of free product, particularly in the area directly downgradient from the release area and the area north of MW-1. Sufficient data are to be collected to evaluate the extent, mobility, and recoverability of the free product in the subsurface. Please also present plans for interim free product recovery in the Work Plan requested below.

3. **Logging Soil Borings.** Sample recovery in the hollow stem auger and rotary casing hammer soil borings was limited to less than one to two feet of sample recovery over intervals of approximately 10 feet or more. The minimal sample recovery limits the ability to locate potential contaminant migration pathways. Please significantly increase the sampling frequency for logging purposes or consider the use of alternative methods to characterize soil conditions. Please present your plans in the Work Plan requested below.
4. **Soil Vapor Extraction Results.** A soil vapor extraction (SVE) system has been installed on the dirt road adjacent to the release as an interim measure. The SVE system is not discussed in detail in the report. Please present information on the design, operation, and sampling results for the SVE system in the Interim Remedial Remediation Report requested below. In addition, please present recommendations regarding the continued operation and expansion of the SVE system as well as recommendations regarding other interim remediation that may be effective for the site.
5. **Quarterly Groundwater Monitoring.** Please collect groundwater samples from monitoring wells on a quarterly basis. Existing groundwater analytical data indicate that fuel oxygenates, 1,2-dichloroethane, and 1,2-dibromomethane are not present at detectable concentrations in groundwater. No analyses appear to have been conducted to date for ethanol and methanol. Please present recommendations for future groundwater analyses in the Work Plan requested below.

TECHNICAL REPORT REQUEST

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

- **February 23, 2006** – Work Plan for Soil and Groundwater Investigation
- **March 2, 2006** – Interim Remediation Report
- **April 15, 2006** – Quarterly Monitoring Report for the First Quarter 2006

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.

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PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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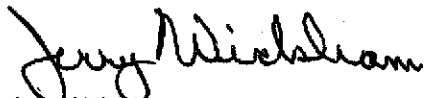
Jeff Cosgray
December 30, 2005
Page 4

AGENCY OVERSIGHT

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If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

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File

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) 337-9335

August 24, 2005

Mr. Jeff Cosgray
Chevron Pipe Line Company
2811 Hayes Road, Room 1366C
Houston, TX 77082-6696

Subject: SLIC Case No. RO0002892, Chevron Sunol Pipeline, 2793 Calaveras Road, Sunol, CA
-- Work Plan Approval

Dear Mr. Cosgray:

Alameda County Environmental Health (ACEH) staff has reviewed the work plan entitled, "Soil and Groundwater Investigation Work Plan," dated August 24, 2005, prepared on your behalf by URS Corporation. The work plan proposes a scope of work consisting of 7 tasks to evaluate the impacts of a gasoline release from a Chevron pipeline at the above-referenced site. ACEH concurs with the proposed scope of work provided that the technical comments below are addressed.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please keep ACEH informed of the proposed schedule for field activities (e-mail preferred to jerry.wickham@acgov.org).

TECHNICAL COMMENTS

- 1. Proposed Soil Boring Locations.** The proposed soil boring locations are acceptable. However, if odor, staining, or elevated photoionization detector (PID) readings are observed in soil samples from borings located outside the estimated "spill impact area," additional borings are to be added to extend each of the proposed transects to fully define the lateral extent of the spill.
- 2. Soil Samples.** Soils are to be continuously logged in each of the soil borings. The proposed fixed depths for collecting soil samples are acceptable. However, soil samples are also to be collected for laboratory analysis within intervals where staining, odor, or elevated photoionization readings are detected.
- 3. Depth of Soil Borings along Calaveras Road.** The proposed depth of 20 feet for soil borings along Calaveras Road is acceptable if groundwater is encountered during drilling within 20 feet below grade. If groundwater is not encountered within 20 feet below grade during drilling, the borings are to be extended until groundwater is first encountered or boring refusal. Below a depth of 20 feet, soil samples are to be collected for laboratory analyses at minimum five-foot intervals and where staining, odor, or elevated photoionization readings are detected. Groundwater samples are to be collected from temporary well screens in each boring.

TECHNICAL REPORT REQUEST

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

- **September 8, 2005** – Laboratory Results, Boring Logs, and Recommendations for Additional Investigation
- **October 10, 2005** – Subsurface Investigation Report

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) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy 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 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, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic%20reporting)).

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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.

UNDERGROUND STORAGE TANK CLEANUP FUND

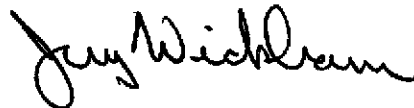
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

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Jerry Wickham
Hazardous Materials Specialist

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1657 Rollins Road, Burlingame, CA 94010

Colleen Winey, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway,
Livermore, CA 94551

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street,
Pleasanton, CA 94566

Susan Hugo, ACEH
Donna Drogos, ACEH
Jerry Wickham, ACEH



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SCWT
8-24-05

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

August 19, 2005

Mr. Jeff Cosgray
Chevron Pipe Line Company
2811 Hayes Road, Room 1366C
Houston, TX 77082-6696

Subject: SLIC Case RO0002892, Chevron Sunol Pipeline, 2793 Calaveras Road, Sunol, CA

Dear Mr. Cosgray:

In order for ACEH to review reports for your site, we would require an oversight account for the above-referenced site. To set up your account, please send a check in the amount of \$8,000.00 payable to Alameda County Environmental Health. Please send your check to the attention of our Finance Department.


This initial deposit may or may not be sufficient to provide all necessary regulatory oversight. ACEH will deduct actual costs incurred based upon the hourly rate specified below. If these funds are insufficient, additional deposit will be requested. Otherwise, any unused monies will be refunded to you or your designee.

The deposit is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project is being debited at the Ordinance specified rate, currently \$166.00 per hour.

Please write "SLIC" (the type of project), the site address, and the AR# 314746 on your check.

If you have any questions, please contact Jerry Wickham at (510) 567-6791.

Sincerely,

for 
Ariu Levi
Division Chief

cc: D. Drogos, J. Jacobs, Jerry Wickham

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



cont 7/27/00

202492

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

July 27, 2000

Mr. Douglas Herman
Environmental Health & Safety Compliance Department
Port of Oakland
P.O. Box 2064
Oakland CA 94607-2064

Re: Proposed Monitoring Changes at Ninth Ave. Terminal, Oakland CA 94606

Dear Mr. Herman:

An error in my July 11, 2000 letter was recently brought to my attention regarding the required groundwater monitoring of well SCIMW-11. There was a contradiction in my bulleted items. This letter serves to correct this contradiction. This well should continue to be monitored according to the first bulleted item ie the well should be monitored semi-annually for the existing analytes. It's monitoring should not be discontinued nor should the well be abandoned as inferred in the third bullet in the July 11, 2000 letter.

I regret any inconvenience or confusion this may have caused. Please contact me at (510) 567-6765 should you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

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