

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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February 1, 2008

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

Subject: SLIC Case No. RO0002892 and Geotracker Global ID SL0600100443, Chevron Sunol Pipeline, 2793 Calaveras Road, Sunol, CA 94586

Dear Mr. Cosgray:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted correspondence entitled, "Response to ACEH November 27, 2007 Letter - Request for Time Extension and Further Clarification Regarding Restart Up of SVE System," dated January 15, 2008 and prepared by URS Corporation. The January 15, 2008 correspondence from URS indicates that the SVE system could not be restarted by January 29, 2008 and recommends not restarting an SVE system. We are concerned that no progress was made toward restarting the SVE system following issuance of our November 29, 2007 directive letter. The November 29, 2007 ACEH correspondence was quite clear in stating that ACEH does not concur with the removal of the SVE system and directed that SVE system operations resume no later than January 29, 2008.

The arguments in the January 15, 2008 URS regarding the discontinuation of remedial activities are unconvincing. **Restarting the SVE system is required.** Failure to do so within the requested time period will result in issuance of a Notice of Violation.

In August 2007, URS informed ACEH that the SVE system was shutdown on August 17, 2008. The SVE system was shut down without approval of ACEH, ostensibly for the safe removal of dead trees on the hillside. However, we note that one of the reasons currently cited in the URS correspondence for not restarting the SVE system is, "unresolved tree removal issues." It is not clear why tree removal takes more than five months and results in terminating SVE operations during the dry season when SVE remediation is most effective. Clearly, some improvements in scheduling and managing site remediation are necessary in order to avoid further delays in restarting the SVE system.

Therefore, we request that you provide a schedule by February 15, 2008 for implementing the tasks necessary to restart the SVE system. The SVE system must be operational no later than 90 days from issuance of this letter, on May 1, 2008. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **SVE Remediation Goals.** The remediation goals recommended in the January 15, 2008 correspondence are rejected. Since no technical basis is presented for these goals, they are rejected without further technical comment. We recommend that you review the U.S. EPA guidance document entitled, "Development of Recommendations and Methods to Support Assessment of Soil Venting Performance and Closure," dated September 2001, which identifies the parameters that should be evaluated prior to recommending closure of an SVE system. In particular, you should review section 2.1 entitled, "Limitations in the Use of Vapor Concentration Asymptotes."
2. **Incorporation or Replacement of Well SVE-8.** Well SVE-8 or a replacement well or wells must be incorporated into the SVE system. If well SVE-8 cannot be used due to perched water in the well, efforts at determining the extent of perched groundwater in this area and installing a replacement well must be made.
3. **Quarterly Groundwater Monitoring.** We request that you continue quarterly groundwater monitoring for the site including sampling and analytical results from the proposed additional groundwater monitoring wells. Based on sampling results to date, we have no objection to discontinuing monitoring and decommissioning wells MW-5 through MW-7. Please present results of the quarterly groundwater sampling in the monitoring reports requested below.

TECHNICAL REPORT REQUEST

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

- **February 15, 2008** – Schedule for SVE System Start Up
- **February 20, 2008** – Quarterly SVE Operation Status Report and Groundwater Monitoring Report for the Fourth Quarter 2007
- **May 1, 2008** – SVE System Start Up and SVE Monitoring and Operations Plan
- **May 20, 2008** – SVE System Start Up Report and Groundwater Monitoring Report for the First Quarter 2008
- **August 20, 2008** – Quarterly SVE Operation and Groundwater Monitoring Report for the Second Quarter 2008

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

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.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. 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 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

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 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 case meet this requirement.

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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.

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Cheryl Dizon, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway,
Livermore, CA 94551

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

Jacob Henry, 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

Craig Freeman, San Francisco Public Utilities Commission, Environmental and Regulatory
Compliance Division, 1145 Market Street, Suite 500, San Francisco, CA 94103

Donna Drogos, ACEH
Jerry Wickham, ACEH
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