



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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March 31, 2010

Mr. Jeff Johnson (*Sent via E-mail to: [jojw@chevron.com](mailto:jojw@chevron.com)*)  
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 – Site Conceptual Model

Dear Mr. Johnson:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted report entitled, “*Fourth Quarter 2009 Groundwater Monitoring Report, SLIC Case RO0002892, Chevron Pipeline Company, Sunol Spill, 2793 Calaveras Road, Sunol, CA,*” dated February 4, 2010 (Report). The February 4, 2010 Report, which was prepared on behalf of Chevron Pipe Line Company by URS Corporation, presents results from groundwater sampling conducted on December 9 and 10, 2009. The February 4, 2010 Report also presents results from a passive soil vapor survey although the title of the Report does not reflect the soil vapor survey.

Chevron Pipe Line Company made a decision to discontinue soil vapor extraction at the site on July 23, 2009. Subsequently, a Work Plan was submitted to conduct a passive soil vapor sampling survey using Gore® Sorbers on the hillside and in the area across Calaveras Road. ACEH approved the Work Plan for the proposed passive soil vapor sampling survey in correspondence dated October 23, 2009. However, please note that ACEH does not concur with the termination of remediation.

The passive soil vapor survey showed higher concentrations of TPH and BTEX at several soil vapor sampling locations on the hillside below the pipeline release. These findings appear to indicate that petroleum hydrocarbons remain in shallow soil on the hillside and provide target areas for continued remediation.

The February 4, 2010 Report recommends development of a work plan for additional borings in the hillside source area with conversion of the borings into soil vapor extraction wells leading to continued operation of the SVE system. During a meeting held on March 25, 2010 between Mr. Jeff Johnson of Chevron Pipe Line Company, Joe Morgan of URS Corporation, Jacob Henry of URS Corporation, and Jerry Wickham of ACEH, development of Site Conceptual Model (SCM) was discussed. In general, we do not object to the development of an SCM in order to identify potential data gaps prior to resuming site remediation.

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

### **TECHNICAL COMMENTS**

1. **Presentation of Results.** The February 4, 2010 Report includes summary tables, groundwater sampling forms, laboratory analytical reports, and chain of custody forms to support the groundwater sampling results presented. However, the only results presented for the passive soil vapor survey are three figures in Appendix C. No supporting tables, sampling forms, or analytical results are presented for the passive soil vapor survey. Please include appropriate supporting documentation for the passive soil vapor survey in an appendix to the SCM requested below.
  
2. **Conclusions Regarding Results from Passive Soil Vapor Survey.** The Findings (Section Five) of the February 4, 2010 Report makes two interpretations regarding the results of the passive soil vapor survey that appear to over-state the significance of the results and use the results to draw conclusions that are not supported by passive soil vapor data. We have provided relevant comments below:
  - Stated Conclusion in Report: “The Gore™ survey confirmed the effectiveness of the SVE system operations in the vicinity of the hillside source area and where additional mass removal can be conducted by comparing the GORE survey results to the individual SVE well removal rates.”
  - ACEH Comment: We concur that the relative concentrations provided by the passive soil vapor survey does allow specific areas of the hillside to be targeted for remedial action and does allow some comparisons to performance of SVE wells. However, it is an overstatement to conclude that the passive soil vapor survey confirms the effectiveness of SVE system operations. The passive soil vapor survey provides relative data with no ability to compare to initial concentrations.
  - Stated Conclusion in Report: “The Gore™ survey confirmed no significant petroleum hydrocarbon pathways from the hillside source area to the nursery.”
  - ACEH Comment: The passive soil vapor modules were installed to a depth of three feet and provide relative concentrations on TPH and BTEX in shallow soil. A gravel layer that may represent a preferential pathway is more than 25 feet bgs on the hillside. Given the complex geology and topography of the site as well as the depth of suspected preferential pathways, it cannot be assumed that all migration pathways would be evident from a passive soil vapor survey.
  
3. **Groundwater Monitoring.** The February 4, 2010 Report recommends continued quarterly groundwater monitoring to assess the effects of seasonal groundwater fluctuations. Please present the results in the groundwater monitoring reports requested below.

### **TECHNICAL REPORT REQUEST**

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

- **May 17, 2010** – Groundwater Monitoring Report for First Quarter 2010
  
- **June 10, 2010** – Site Conceptual Model
  
- **August 17, 2010** – Groundwater Monitoring Report for Second Quarter 2010

- **November 15, 2010** – Groundwater Monitoring Report for Third Quarter 2010

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) require submission of reports in electronic form. The electronic copy replaces paper copies 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 all 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, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is 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](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 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.

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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](mailto: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 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551  
(Sent via E-mail to: [cdizon@zone7water.com](mailto:cdizon@zone7water.com))

Joe Morgan III, URS Corporation, 1333 Broadway, Suite 800, Oakland, CA 94612 (Sent via E-mail to: [joe\\_morgan@urscorp.com](mailto:joe_morgan@urscorp.com))

Jacob Henry, URS Corporation, 1333 Broadway, Suite 800, Oakland, CA 94612 (Sent via E-mail to: [jacob\\_henry@urscorp.com](mailto:jacob_henry@urscorp.com))

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 (Sent via E-mail to: [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org))  
Jerry Wickham, ACEH

Geotracker, File

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>ISSUE DATE:</b> July 5, 2005
	<b>REVISION DATE:</b> March 27, 2009
	<b>PREVIOUS REVISIONS:</b> December 16, 2005, October 31, 2005
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

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.

#### REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:  
RO#\_Report Name\_Year-Month-Date (e.g., RO#5555\_WorkPlan\_2005-06-14)

#### Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

#### Submission Instructions

- 1) Obtain User Name and Password:
  - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
    - i) Send an e-mail to [dehloptoxic@acgov.org](mailto:dehloptoxic@acgov.org)
    - Or
    - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of My Le Huynh.
  - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses**, and the **Case Numbers (RO# available in Geotracker) you will be posting for**.
  
- 2) Upload Files to the ftp Site
  - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
    - (i) Note: Netscape and Firefox browsers will not open the FTP site.
  - b) Click on File, then on Login As.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
  - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
  
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
  - a) Send email to [dehloptoxic@acgov.org](mailto:dehloptoxic@acgov.org) notify us that you have placed a report on our ftp site.
  - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
  - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO# use the street address instead.
  - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.