



Stephen Gwin
Environmental Specialist

**Health, Environment & Safety
Chevron Pipe Line Company**
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June 28, 2013

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

RECEIVED

By Alameda County Environmental Health at 2:49 pm, Jul 09, 2013

Dear Mr. Wickham:

I declare, under penalty of perjury, that the information and/or recommendations contained in URS' report titled "**SLIC Case No. RO0002892, Chevron Sunol Pipeline, 2793 Calaveras Rd, Sunol, CA Response to April 4, 2013 Regulatory Letter—Technical Comments and Data Gap Investigation Report Addendum**" are true and correct to the best of my knowledge at the present time.

Submitted by:

A handwritten signature in black ink that reads "Stephen Gwin".

Stephen Gwin
Chevron Pipe Line Company

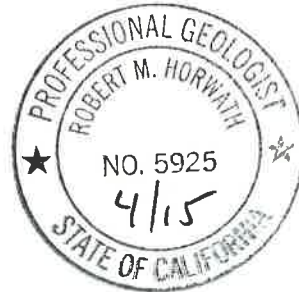


This letter report (“**Technical Comments and Data Gap Investigation Report Addendum**”) was prepared under my direct supervision. The information presented in this report is based on our review of available data obtained during our quarterly sampling activities and our previous subsurface investigation efforts. To the best of our knowledge, we have incorporated into our recommendations all relevant data pertaining to the Chevron Pipeline Company’s Sunol Spill Site in Sunol, California.

The Technical Comments and Data Gap Investigation Report Addendum discussed herein was developed in accordance with the standard of care used to develop this type of report. The assumptions that were made and the recommendations for continued field activities were based on our professional experience and protocols reported in the literature for similar investigations.

Approved by:
URS CORPORATION

Joe Morgan III
Senior Project Manager



Robert Horwath, P.G.
Senior Geologist



June 28, 2013

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 April 4, 2013 Regulatory Letter—Technical Comments and Data Gap
Investigation Report Addendum**

Dear Mr. Wickham:

The Alameda County Environmental Health (ACEH) letter dated April 4, 2013, provided comments on the URS Data Gap Investigation Report submitted January 28, 2013. (Attachment A) On behalf of the Chevron Pipeline Company, URS is submitting this *Response to April 4, 2013 Regulatory Letter—Technical Comments and Data Gap Investigation Report Addendum* to address ACEH comments.

Comment 1.

Well Installation. Four monitoring wells were installed along Calaveras Road. The Report indicates that the wells could not be developed or sampled due to a lack of groundwater. We concur with the plan to gauge the wells on a monthly basis and develop and sample the wells when sufficient groundwater is present. We request that you present the results of the well development and sampling in a report no later than June 28, 2013.

URS will continue to gauge the four new monitoring wells (MW-12 through MW-15) on a monthly basis. If the wells do not have enough water to develop by June 2013, a period of 7 months since installation in the rainy season of 2012 through 2013, URS will request permission from ACEH to close the wells that cannot be developed. The clean soil from the well installations of MW-12 through MW-15 shows that laterally there are no total petroleum hydrocarbon as gasoline (TPHg) impacts greater than 50 feet from MW-8.

The weathered bedrock is not consistently impermeable at monitoring well locations MW-8 and MW-12 through MW-15 presumably because of fractures and pulverized sandstone within the general fault zone. Groundwater elevations levels in MW-8, MW-12 and MW-15 suggest that those monitoring well locations are part of a perched water zone on top of impermeable to semi-impermeable weathered bedrock. The absence of groundwater in MW-13 and MW-14 implies that groundwater is seeping through the gravel zone to the weathered bedrock zone

which makes up the unconfined water zone that used to be monitored by MW-5, MW-6 and MW-7. Due to this, it is unlikely that development of MW-13 and MW-14 will result in sufficient groundwater for monitoring and sampling. MW-8 is laterally delineated to the south by MW-15, to the east by the rocky hillside, to the north by the dry wells (MW-13 and MW-14), and to the west by MW-2 through MW-4 and MW-11. Monitoring well MW-8 is vertically delineated by former monitoring wells MW-5 through MW-7.

Comment 2.

Cross Sections. Thank you for providing the cross section on Figure 3 of the Report. The cross section is a useful tool for visualizing the site hydrogeology. Please add well MW-8 to the cross section in future reports.

MW-8 was present on the Figure 3 dated January 28, 2013 Data Gap Investigation and Remediation Report. MW-8 is located in the center of the geologic cross section, between MW-13 and abandoned MW-5.

Comment 3.

Monitoring Wells on Figure F-2 of Well Survey Data. Figure F-2 in Appendix F of the Report shows several monitoring wells near the site and west of the site. However, the base map is at a scale of 1 inch equals 1,200 feet and it is not clear whether all of the wells shown in the area of Calaveras Road are monitoring and vapor extractions wells installed for this site. The Report indicates that Figure F-2 shows groundwater monitoring and soil vapor extraction wells for the CPL Sunol site. However, several of the monitoring wells are shown at greater distances from the Calaveras Road than the monitoring wells installed for the site. In the Site Investigation Report requested below, we request that you present a revised Well Survey Results section that includes a revised Figure F-2. Figure F-2 should be revised by providing a more detailed base map that clearly identifies and differentiates all site wells and any other monitoring wells that were not installed for the CPL Sunol site. The Well Survey Results section of the Report should be revised to provide available information on any monitoring wells that are not site wells and to evaluate whether any of these wells could potentially be used to verify plume extent.

URS agrees that Figure F-2 provided by Zone 7 is not the same scale as the URS provided Figure F-1. This makes comparison between the two figures difficult. URS has contacted Zone 7 and received the coordinate information for the wells located within a ½-mile radius of the site, and has included this information in the updated Well Survey Results section, table, and new Figure F-1 in Attachment B.

Comment 4.

Vapor Extraction Wells on Figure F-1 of Well Survey Data. Figure F-2 in Appendix F shows two vapor extraction wells in Alameda Creek. The wells were installed in August 2007 and the well owner is the San Francisco Public Utilities Commission. Please provide any additional information available regarding the purpose and use of these wells.

The two wells identified in Appendix F, URS Table F-1, were misrepresented as vapor extraction wells. Further review of the California Department of Water Resources (DWR) Well

Completion Reports shows that the wells previously described as vapor extraction wells are actually piezometer wells. URS contacted SFPUC for more information regarding the purpose and use of the piezometer wells but did not receive a response. It is known that these wells are in part of the Hetch Hetchy water supply monitoring and conveyance system. Further review of the DWR Well Completion logs and the lack of information indicating well location, as well as the additional information received from Zone 7, the wells identified by Zone 7 are the same wells as previously identified by DWR. Based on the coordinate information received from Zone 7, the local well survey results shown on Figure F-1 have been replotted approximately 780 feet (well 1) and 140 feet (well 2) further west of the Site. As such, the attached addendum section only includes new Figure F-1 showing the locations of the DWR and the Zone 7 wells (Attachment B).

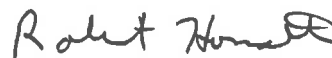
Please do not hesitate to contact Joe Morgan at (510) 874-3201.

Sincerely,

URS CORPORATION



Joe Morgan
Project Manager



Robert Horwath, P.G.
Senior Geologist

cc: Steve Gwin, Chevron
Rachel Naccarati, URS
Christine Pilachowski, URS
Jeremy Quick, URS

ATTACHMENTS

Attachment A	ACEH Correspondence
Attachment B	Data Gaps and Remediation Report Addendum

ATTACHMENT A

ACEH CORRESPONDENCE



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

April 4, 2013

Mr. Stephen Gwin (*Sent via E-mail to: gwst@chevron.com*)
Chevron Pipe Line Company
4800 Fournace Place
Bellaire, TX 77401-2324

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

Dear Mr. Gwin:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the document entitled, "*Data Gap Investigation and Remediation Report, Chevron Sunol Pipeline, Sunol, CA,*" dated January 28, 2013 (Report). The Report, which was prepared on behalf of Chevron Pipe Line Company by URS Corporation, presents results from installation of four monitoring wells, an updated biological survey, and a well survey.

Based on our review of the Report, we have the following technical comments. We request that you address the technical comments below and send us the reports requested below.

TECHNICAL COMMENTS

- 1. Well Installation.** Four monitoring wells were installed along Calaveras Road. The Report indicates that the wells could not be developed or sampled due to a lack of groundwater. We concur with the plan to gauge the wells on a monthly basis and develop and sample the wells when sufficient groundwater is present. We request that you present the results of the well development and sampling in a report no later than June 28, 2013.
- 2. Cross Sections.** Thank you for providing the cross section on Figure 3 of the Report. The cross section is a useful tool for visualizing the site hydrogeology. Please add well MW-8 to the cross section in future reports.
- 3. Monitoring Wells on Figure F-2 of Well Survey Data.** Figure F-2 in Appendix F of the Report shows several monitoring wells near the site and west of the site. However, the base map is at a scale of 1 inch equals 1,200 feet and it is not clear whether all of the wells shown in the area of Calaveras Road are monitoring and vapor extraction wells installed for this site. The Report indicates that Figure F-2 shows groundwater monitoring and soil vapor extraction wells for the CPL Sunol site. However, several of the monitoring wells are shown at greater distances from the Calaveras Road than the monitoring wells installed for the site. In the Site Investigation Report requested below, we request that you present a revised Well Survey Results section that includes a revised Figure F-2. Figure F-2 should be revised by providing a more detailed base map that clearly identifies and differentiates all site wells and any other monitoring wells that were not installed for the CPL Sunol site. The Well Survey Results section of the Report should be revised to provide available information on any monitoring wells that are not site wells and to evaluate whether any of these wells could potentially be used to verify plume extent.

Mr. Stephen Gwin,
RO0002892
April 4, 2013
Page 2

4. **Vapor Extraction Wells on Figure F-1 of Well Survey Data.** Figure F-2 in Appendix F shows two vapor extraction wells in Alameda Creek. The wells were installed in August 2007 and the well owner is the San Francisco Public Utilities Commission. Please provide any additional information available regarding the purpose and use of these wells.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Jerry Wickham), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **June 28, 2013** – Site Investigation Report
File to be named: SWI_R_yyyy-mm-dd RO2892

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org. Case files can be reviewed online at the following website: <http://www.acgov.org/aceh/index.htm>.

Sincerely,

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

Attachment: Responsible Party(ies) Legal Requirements/Obligations
Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Colleen Winey (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551
(Sent via E-mail to: cwiney@zone7water.com)

Joe Morgan III, URS Corporation, 1333 Broadway, Suite 800, Oakland, CA 94612 (Sent via E-mail to: joe_morgan@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 (Sent via E-mail to: CFreeman@sflower.org)

Donna Drogos, ACEH (Sent via E-mail to: donna.drogos@acgov.org)
Jerry Wickham, ACEH (Sent via E-mail to: jerry.wickham@acgov.org)
GeoTracker, eFile

Attachment 1

Responsible Party(ies) Legal Requirements/Obligations

REPORT/DATA REQUESTS

These reports/data are being requested pursuant to Division 7 of the California Water Code (Water Quality), Chapter 6.7 of Division 20 of the California Health and Safety Code (Underground Storage of Hazardous Substances), and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations (Underground Storage Tank Regulations).

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (Local Oversight Program [LOP] for unauthorized releases from petroleum Underground Storage Tanks [USTs], and Site Cleanup Program [SCP] for unauthorized releases of non-petroleum hazardous substances) require submission of reports in electronic format pursuant to Chapter 3 of Division 7, Sections 13195 and 13197.5 of the California Water Code, and Chapter 30, Articles 1 and 2, Sections 3890 to 3895 of Division 3 of Title 23 of the California Code of Regulations (23 CCR). Instructions for submission of electronic documents to the ACEH FTP site are provided on the attached "Electronic Report Upload Instructions."

Submission of reports to the ACEH FTP site is in addition to requirements for electronic submittal of information (ESI) to the State Water Resources Control Board's (SWRCB) Geotracker website. In April 2001, the SWRCB adopted 23 CCR, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1 (Electronic Submission of Laboratory Data for UST Reports). Article 12 required electronic submittal of analytical laboratory data submitted in a report to a regulatory agency (effective September 1, 2001), and surveyed locations (latitude, longitude and elevation) of groundwater monitoring wells (effective January 1, 2002) in Electronic Deliverable Format (EDF) to Geotracker. Article 12 was subsequently repealed in 2004 and replaced with Article 30 (Electronic Submittal of Information) which expanded the ESI requirements to include electronic submittal of any report or data required by a regulatory agency from a cleanup site. The expanded ESI submittal requirements for petroleum UST sites subject to the requirements of 23 CCR, Division, 3, Chapter 16, Article 11, became effective December 16, 2004. All other electronic submittals required pursuant to Chapter 30 became effective January 1, 2005. Please visit the SWRCB website for more information on these requirements. (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

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, 7835, 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.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, late 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

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: July 25, 2012
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (petroleum UST and SCP) 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

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as a **single Portable Document Format (PDF) with no password protection.**
- 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)

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 .loptoxic@acgov.org
 - 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 <://alcoftp1.acgov.org>
 - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - 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 .loptoxic@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.

ATTACHMENT B

DATA GAPS INVESTIGATION AND REMEDIATION ADDENDUM

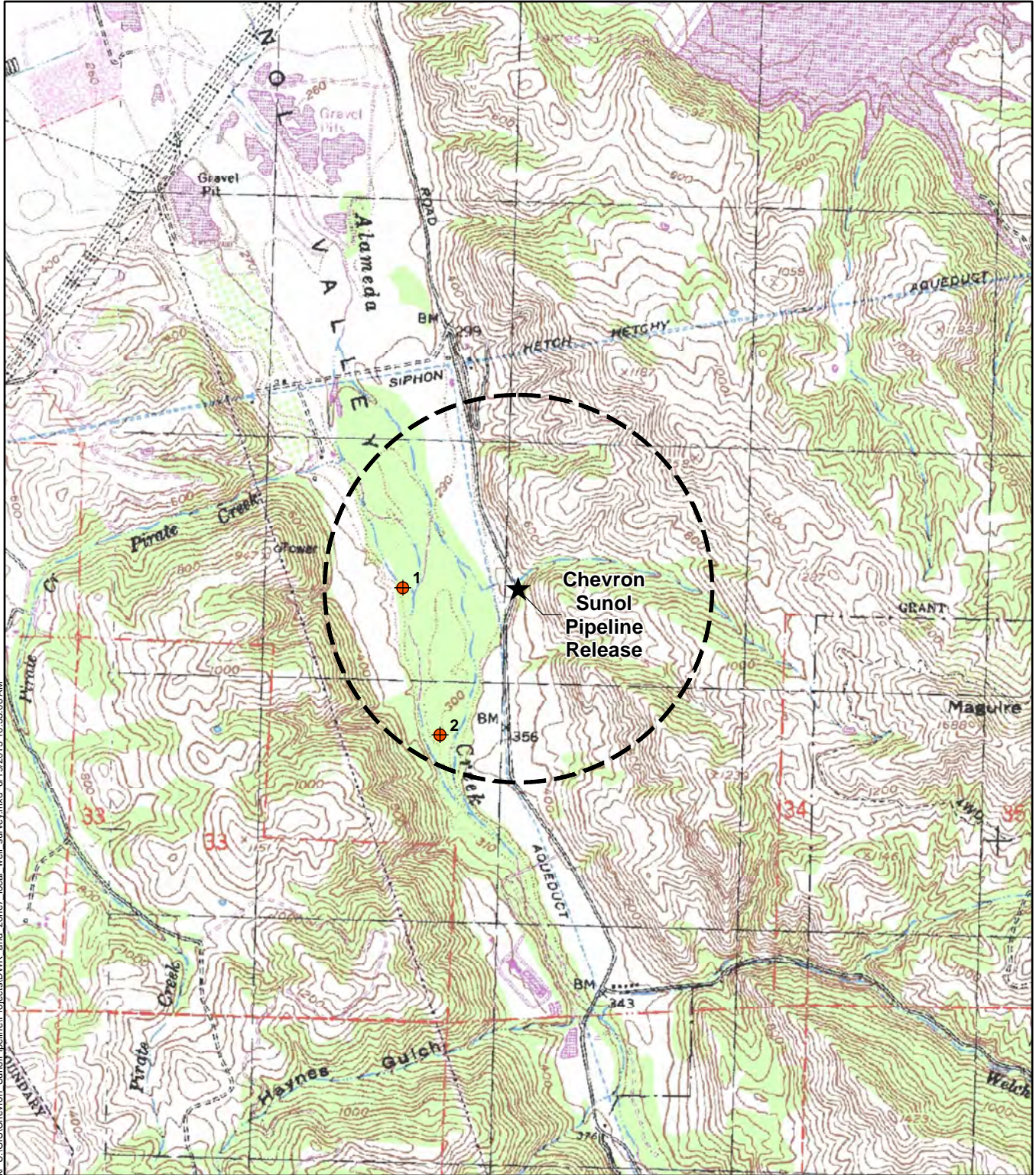
URS conducted a local well survey by contacting DWR–Central District in Sacramento via Well Completion Report Release Agreement- Environmental Cleanup Study Form, cosigned by URS and ACEH. The DWR identified six wells within the Site vicinity. Upon further review, only two wells were determined to be within the ½-mile search radius. The two wells are piezometer wells owned by SFPUC. The wells range in depth from 24 to 26 feet bgs.

URS also contacted Zone 7 to identify wells within a half mile radius of the Site. Zone 7 identified no water supply wells within ½-mile of the Site vicinity. The two piezometer wells previously identified by DWR were also identified by Zone 7. Based on coordinates provided by Zone 7 the piezometer wells are located approximately 0.30 miles west and 0.43 miles southwest (on the other side of Alameda Creek) of the Site.

Based on the dimensions of the hydrocarbon plume, and the locations and distances to these wells, it is not likely that the piezometer wells could be impacted by the hydrocarbon plume at the Site. Well survey data is presented in Table F-1 and locations are depicted on Figure F-1 (Appendix F).



TABLE F-1
Summary of Local DWR Zone 7 Well Survey Results
Data Gap Investigation and Remediation Report
Chevron Sunol Pipeline

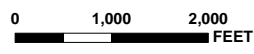
Map ID	State Well No.	Well Owner	Approximate Well Location	Installation Date	Longitude	Latitude	Well Type	Total Depth (feet bgs)	Location in Relation to the Site	Approximate Distance from Site
1	E0081063	SFPUC	Calaveras Road & Hetch Hetchy Aqueduct, Sunol CA	8/27/2007	-121.862527	37.550796	Piezometer	26	West	0.30 miles
2	E0081062	SFPUC	Calaveras Road & Hetch Hetchy Aqueduct, Sunol CA	8/24/2007	-121.860675	37.545317	Piezometer	24	Southwest	0.43 miles



K:\GIS\Chevron_Sunol\Pipeline\Projects\DWR_and_zone7_local_well_survey.mxd 6/19/2013 10:33:08 AM

Source: USGS 7.5-minute quadrangle, La Costa Valley, photo revised, 1978.

-  Piezometer
-  Half-mile radius of project site



**DWR AND ZONE 7
LOCAL WELL SURVEY RESULTS**

June 2013
26817187

Chevron Sunol Pipeline
Sunol, California



FIGURE F-1