

Nowell, Keith, Env. Health

From: Nowell, Keith, Env. Health
Sent: Wednesday, May 21, 2014 2:45 PM
To: 'JillianHolloway@chevron.com'
Cc: Katherine.Brandt@arcadis-us.com; 'AFischer@Chevron.com'; Roe, Dilan, Env. Health
Subject: Fuel Leak Case RO2968 -UNOCAL #3072 / CONOCOPHILLIPS, 2445 CASTRO VALLEY BLVD., CASTRO VALLEY

Dear Ms. Holloway,

Thank you, Katherine Brandt and Jake Henry of ARCADIS U.S., Inc. (ARCADIS), and Alexis Fischer of Chevron Environmental Management Company (Chevron) for participating in the meeting on April 17, 2014 regarding fuel leak case for Unocal #3072/ ConocoPhillips, 2445 Castro Valley Boulevard, Castro Valley, Alameda County Environmental Health (ACEH) case number RO0002968. The purpose of the meeting was to discuss the *Conceptual Site Model and Request for Low-Threat Closure Addendum* (RFC), dated January 30, 2014, prepared by ARCADIS for the subject site and identify action items to move the case forward toward closure. ACEH acknowledges the case may be a candidate for closure in the near future under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) provided concerns regarding the presence and distribution of diesel at the site, plume length determination and distance to sensitive receptors, groundwater flow direction, vertical delineation of contaminant plume, and leak history are addressed.

Therefore at this juncture, please address the following technical comments and submit the requested document by the date specified below:

Technical Comments

- Diesel - Discuss the presence and distribution of diesel at the site.
- Plume Length - Modify plume evaluation in accordance with the basin plan using drinking water standards. Include TBA in the plume analysis. Evaluate maximum plume length using the *Technical Justification for Groundwater Plume Length, Indicator Constituents, Concentrations, Buffer Distances (Separation Distances) to Receptors* (LTCP Guidance; SWRCB 2012) and plot appropriate buffer distance on the sensitive receptor figure.
- Mobil/Jiffy Lube - Provide a figure showing the relative location of the Mobil/Jiffy Lube to the site and provide material referenced as Appendix G, but not provided in document. Evaluate if it is possible to use Jiffy Lube for an examination of plume length determination, providing well details for the Mobil/Jiffy Lube.
- Sensitive Receptors - Include a site map using an aerial photo base of sufficient scale to show sensitive receptors including the wells associated with Eden Hospital and the creek to east. Evaluate depth of creek bed relative to the depth of contamination found beneath the site.
- Groundwater Flow - Evaluate if groundwater flow follows the bed rock surface and plot groundwater flow direction using a rose diagram.
- Vertical Delineation - Evaluate the source and extent of MTBE detected in groundwater samples at depth (CPT-1 and CPT-4).
- Release History - Provide references to the 1995 and 2005 leaks mention in the RFC.

Please present your findings in a Focused Site Conceptual Model and provide recommendations for case closure or a work plan to collect additional information to fill data gaps if required.

Technical Report Request

Please upload technical reports to the ACEH ftp site (Attention: Keith Nowell), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **June 23, 2014– Focused Site Conceptual Model and Data Gap Identification Work Plan** (file name: RO0002968_SCM_R_yyyy-mm-dd)

Thank you for your cooperation. ACEH looks forward to working with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Regards,
Keith Nowell

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PDF copies of case files can be reviewed/downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>