



October 26, 2018

M. J. Garfinkle and Susan G. Block etal (Sent via e-mail to: garsurg@comcast.net)
352 Capetown Drive
Alameda, CA 94502-6426

Ms. Shelby Lathrop (Sent via e-mail to: slathrop@chevron.com)
Chevron Environmental Management Company, Downstream Business Unit
6001 Bollinger Canyon Road, C2092
San Ramon, CA 94583

Subject: Work Plan Request for Fuel Leak Case No. RO0003230 and GeoTracker Global ID
T10000009401, 1200 Park Street, 1200 Park Street, Alameda, CA 94501

Ladies and Gentlemen:

Thank you for submitting the following documents prepared and submitted on your behalf by Arcadis Design and Consulting (Arcadis) to Alameda County Department of Environmental Health (ACDEH):

- May 15, 2018, *Groundwater Monitoring and Sampling Report, Former Chevron Service Station No. 90955, 1200 Park Street, Alameda, CA*
- May 31, 2018, *Well Installation Report, Former Chevron Service Station No. 90955, 1200 Park Street, Alameda, CA*
- July 11, 2018, *Second Quarter 2018 Groundwater Monitoring and Sampling Report, Former Chevron Service Station No. 90955, 1200 Park Street, Alameda, CA*

ACDEH has evaluated the data above-listed reports and the case file to the State Water Resources Control Board's Low Threat Closure Policy (LTCP) and we have determined the site does not meet the LTCP General Criteria e (Site Conceptual Model) and the Media-Specific Criteria for Groundwater. The Media-Specific Criteria for Vapor Intrusion to Indoor Air and Media-Specific Criteria Direct Contact and Outdoor Air Exposure are currently met because the site is vacant, occupied by a paved parking lot, and a commercial building with a slab-on-grade foundation. Consequently, there does not appear to be a potential vapor intrusion risk to onsite receptors or direct contact to soil.

ACDEH requests that you prepare a Data Gap Investigation Work Plan that is supported by a Site Conceptual Model (SCM) to address the Technical Comments provided below.

TECHNICAL COMMENTS:

LTCP General Criteria e (Site Conceptual Model): According to the LTCP, the SCM is a fundamental element of a comprehensive site investigation. The SCM establishes the source and attributes of the unauthorized release, describes all affected media (including soil, groundwater, and soil vapor as appropriate), describes local geology, hydrogeology and other physical site characteristics that affect contaminant environmental transport and fate, and identifies all confirmed and potential contaminant receptors (including water supply wells, surface water bodies, structures and their inhabitants). All relevant site characteristics identified by the SCM shall be assessed and supported by data so that the nature, extent and mobility of the release have been established to determine conformance with applicable criteria in this policy.

LTCP Media Specific Criteria for Groundwater: To satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites listed in the policy. Our review of the case files indicates that insufficient data and analysis has been presented to support the requisite characteristics of plume stability or plume length classification.

Our review of the case files indicates that insufficient data collection and analysis has been presented to assess the nature, extent, and mobility of the release and to support compliance with General Criteria e (Site Conceptual Model) and Media Specific Criteria for Groundwater. Please prepare Data Gap Investigation Work Plan to address the following Technical Comments and support the scope of work in the Data Gap Investigation Work Plan with an updated SCM and Data Quality Objectives (DQOs) that relate the data collection to each LTCP criteria.

1. **Request Off-Site Groundwater Delineation:** The contaminant plume is not defined up gradient or down gradient off of the site, because of the varying groundwater gradient direction from north-northwest to west-northwest from two successive sampling events on April 2, 2018 and May 31, 2018. Additionally, concentrations of total petroleum hydrocarbons as gasoline (TPHg), naphthalene, and /or ethylbenzene detected in MW-2 and/or MW-3 exceed the water quality objectives and are undefined off-site. Please present a strategy in the Data Gap Work Plan requested below to determine if groundwater downgradient of the site has been impacted by the release.

2. **Sensitive Receptor Survey:** As part of the Data Gap Work Plan, please propose the completion of a Sensitive Receptor Study to determine if sensitive receptors are present within a radius of 1,500 feet of the site. ACDEH requests review of both Alameda County Public Works Agency (ACPWA) and Department of Water Resources (DWR) well data base for a complete inventory of vicinity water supply wells. The ACPWA and DWR data bases provide dissimilar results which necessitate review of both data bases. ACDEH requests the identification and location on a site vicinity figure of all irrigation, water supply, industrial, and dewatering wells within a 1,500-foot radius of the site. Please be aware that well locations are not confidential, however well construction details are and must not be included with the requested report.
 - a. **Sensitive Receptor Identification:** Please identify on one figure the beneficial resources and other sensitive receptors including, but not limited to, surface water bodies, natural resources, schools, hospitals, day care centers, elder care facilities, etc.
 - b. **Underground Utility Survey:** Please include the results of an on-and off-site underground utility survey including depths to the underground utilities.
 - c. **Foundation and Sump Survey of Neighboring Properties:** Please conduct a foundation and sump survey of all businesses and residences located downgradient of the site along Park Street and San Jose Avenue. The survey should include a visual inspection of below grade foundations types (half basement, full basement, crawl space) and evidence of foundation dewatering sumps by the presence of hoses and/or drain lines to street or other configuration. Flyers and knocking on doors is not required.

Please plot the results of the well survey, sensitive receptor identification, underground utility survey, and foundation and sump survey on an aerial photography-based figure and provide a table listing the numbered location similar to the example provided in Attachment B, *Sample Well Survey Figure and Table*.

3. **SCM Preparation:** ACDEH requests preparation of an SCM to be presented in a tabular format that highlights the major SCM elements and associated data gaps, which need to be addressed to progress the site to case closure under the LTCP. ACDEH has developed an SCM in an EXCEL spread sheet format, which will be sent by e-mail separately. Please do not use the SCM format included in Attachment A of the December 5, 2016 Directive Letter.
4. **Site Management Plan (SMP):** Please prepare a Site Management Plan (SMP) for the property as is, with no changes to existing site buildings or slabs. The SMP is to provide detailed information regarding known environmental conditions at the Site. The SMP must include a figure showing the configuration of the historic site infrastructure of the commercial service station and auto repair facility. The site plan must also identify the current surface covering including the location of landscaped areas, degraded asphalt, and historic concrete slabs. The SMP must provide guidance for construction workers about environmental conditions at the site during subsurface work including protocols for health and safety and identification and management of contaminated media, when it is encountered.
5. **Upcoming Groundwater Monitoring and Sampling Report Request:** Due to the presence of at least two generations of waste oil USTs, please analyze groundwater samples from all four groundwater monitoring wells for the full suite volatile organic compounds (VOCs) for a minimum of one sampling event.
6. **Miscellaneous Report Requests:**
 - a. **Site Figures:** On all site figures, please indicate the former underground storage tank (UST) pit, former dispensers, and two former waste oil USTs.
 - b. **Non-Detected (ND) Detection Limits:** When preparing summary tables of current and historical soil and groundwater analytical results, please report the actual detection limits for all Non-Detected (ND) results (<x.x). Do not use "ND" on any tables, figures, or text.

TECHNICAL REPORT REQUEST:

Please upload technical reports to the ACDEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's GeoTracker website according to Attachment 1 by the following schedule and file-naming convention:

- **November 30, 2018** – Third Quarter 2018 Groundwater Monitoring and Sampling Report
File to be named: RO3230_GWM_R_YYYY-mm-dd
- **December 28, 2018** – Data Gap Work Plan, Site Conceptual Model, and SMP
File to be named: RO3230_WP_SCM_SMP_R_YYYY-mm-dd
- **February 28, 2019**– Fourth Quarter 2018 Groundwater Monitoring and Sampling Report
File to be named: RO3230_GWM_R_YYYY-mm-dd

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

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this request. Online case files are available for review at the following website:
<http://www.acgov.org/aceh/lop/ust.htm>

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please send me an e-mail message at karel.detterman@acgov.org or call me at (510) 567- 6708.

Sincerely,

Karel Detterman, PG
Senior Hazardous Materials Specialist

Enclosures: Attachment 1, Responsible Party(ies) Legal Requirements/Obligations
ACDEH Electronic Report Upload (ftp) Instructions

Attachment B, *Sample Well Survey Figure and Table*

cc: Katherine Szymanowski, Arcadis, 2300 Clayton Road, Suite 400, Concord, CA 94520 (Sent via e-mail to: Katherine.Szymanowski@arcadis.com)

Nicole Gleason, Esq., Diepenbrock Elkin Gleason, 500 Capitol Mall, Suite 2200, Sacramento, CA 95814 (Sent via E-mail to: ngleason@diepenbrock.com)

Robert Goodman, Esq., Rogers Joseph O'Donnell, 331 California Street, 10th Floor, San Francisco, CA 94104 (Sent via E-mail to: rgoodman@rjo.com)

Ben Garfinkle, (Sent via E-mail to: bgarfinkle@clampswing.com)

Dilan Roe, ACDEH (Sent via E-mail to: dilan.roe@acgov.org)

Karel Detterman, ACDEH (Sent via E-mail to: karel.detterman@acgov.org)

Paresh Khatri, ACDEH (Sent via E-mail to: paresh.khatri@acgov.org)

GeoTracker, Electronic Case File

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>				
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) 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 licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

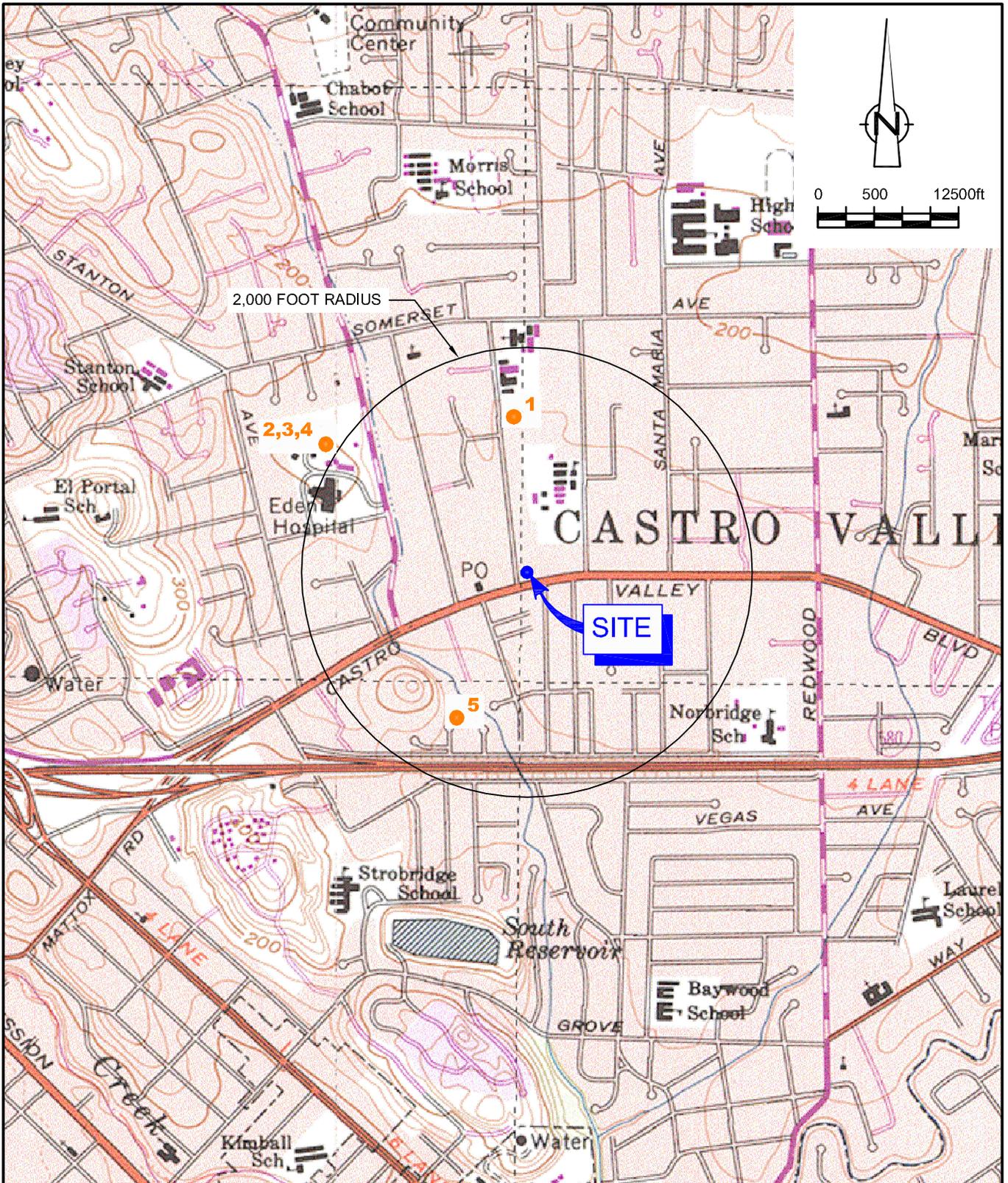
AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.

ATTACHMENT B

**WELL SURVEY RESULTS
CHEVRON STATION 9-6991
2920 CASTRO VALLEY BOULEVARD
CASTRO VALLEY, CALIFORNIA**

<i>Well No./ Figure ID</i>	<i>Well Owner</i>	<i>Well Address Street</i>	<i>City</i>	<i>Total Well Depth (ft)</i>	<i>Date Installed</i>	<i>Distance/Direction from Site (ft) (approx)</i>	<i>Well Use</i>
1	Private	20036 Anita Avenue Lake Chabot Road	Castro Valley	51	2/19/1953	1,400 N	Domestic
2	Eden Township Hospital	1,000' south of Williams	Castro Valley	150	9/30/1953	2,000 NW	Test well
3	Eden Township Hospital	Eden Township Hospital	Castro Valley	250	9/9/1952	2,000 NW	Domestic
4	Eden Township Hospital	Eden Township Hospital	Castro Valley	60	7/11/1952	2,000 NW	Cooling system return
5	Sam Wallace	Tyee Court	Castro Valley	52	7/3/1953	1,400 S-SW	Domestic



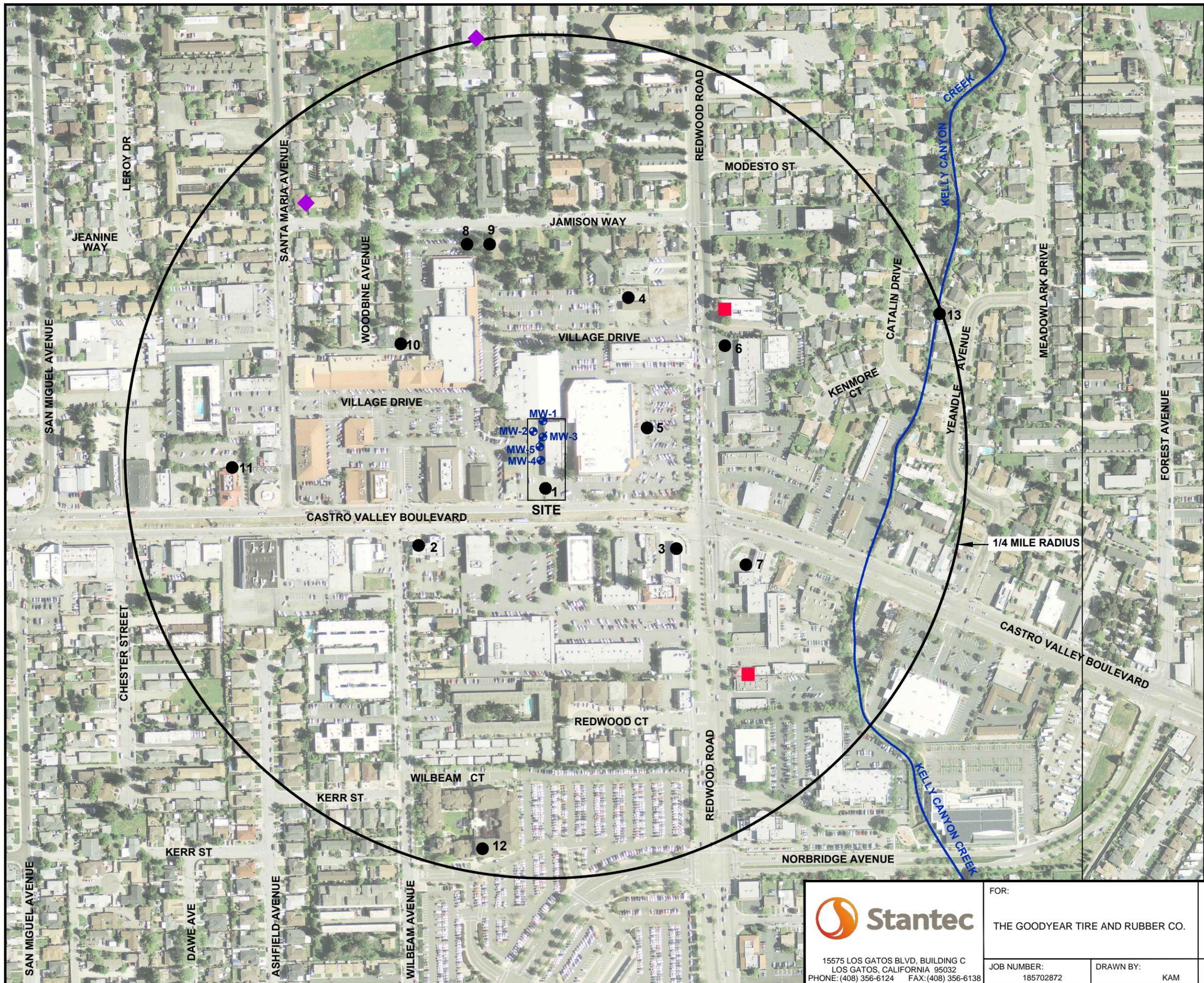
SOURCE: TOPO! MAPS.

LEGEND

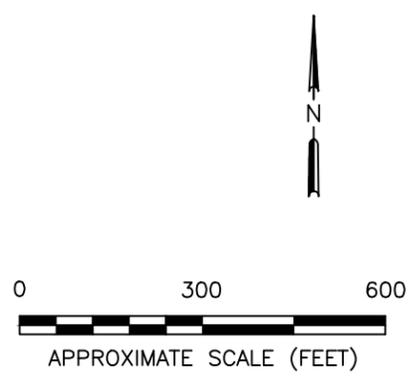
- APPROXIMATE WELL LOCATION



WELL SURVEY MAP
CHEVRON SERVICE STATION 9-6991
2920 CASTRO VALLEY BOULEVARD
Castro Valley, California



- LEGEND:**
- PROPERTIES WITH WELLS WITHIN 1/4-MILE OF SITE
 - MEDICAL OFFICES WITHIN 1/4-MILE OF SITE
 - ◆ SCHOOLS WITHIN 1/4-MILE OF SITE
 - ⊕ ACTIVE GROUNDWATER MONITORING WELL LOCATION
 - ⊗ DESTROYED GROUNDWATER MONITORING WELL LOCATION



<p>15575 LOS GATOS BLVD, BUILDING C LOS GATOS, CALIFORNIA 95032 PHONE: (408) 356-6124 FAX: (408) 356-6138</p>	FOR:		WELL & SENSITIVE RECEPTOR SURVEY GOODYEAR DEX #9578 3430 CASTRO VALLEY BOULEVARD CASTRO VALLEY, CALIFORNIA		FIGURE:
	THE GOODYEAR TIRE AND RUBBER CO.				6
JOB NUMBER:	DRAWN BY:	CHECKED BY:	APPROVED BY:	DATE:	
185702872	KAM	KM	GM	01/08/15	