



Carryl MacLeod
Project Manager, Marketing Business Unit

May 10, 2017

Alameda County Health Care Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

RECEIVED

By Alameda County Environmental Health 8:47 am, May 12, 2017

Re: Former Chevron Service Station No. 90955
1200 Park Street
Alameda, California
Case No. RO0003230

I have read and acknowledge the content, recommendations and/or conclusions contained in the attached *Work Plan Addendum* submitted on my behalf to ACDEH's FTP server and the SWRCB's GeoTracker website.

This letter is submitted pursuant to the requirements of California Water Code Section 13267(b)(1) and the regulating implementation entitled Appendix A pertaining thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge

Sincerely,

A handwritten signature in blue ink that reads "Carryl MacLeod".

Carryl MacLeod
Project Manager

Attachment: *Work Plan Addendum*



May 10, 2017

Reference No. 11119162

Karel Detterman
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

**Re: Work Plan Addendum
Former Chevron Service Station 90955
1200 Park Street (“property” or “site”)
Alameda, California
ACDEH Case No. RO0003230**

Dear Ms. Detterman

GHD is submitting this *Work Plan Addendum* for the site referenced above (Figures 1 and 2) on behalf of Chevron Environmental Management Company (CEMC), as requested by the Alameda County Department of Environmental Health Services (ACDEH) in a letter dated April 7, 2017 (Attachment A). In their letter to CEMC and the property owners, M.J. Garfinkle and Susan G. Block, ACDEH provided technical comments in response to GHD’s February 3, 2017 *Work Plan for Additional Site Assessment*. GHD’s responses to ACDEH’s technical comments are presented below.

1. Responses to Technical Comments

1.1 **LTCP General Criteria b (Unauthorized Release Consists Only of Petroleum), General Criteria d (Free Product), General Criteria f – Secondary Source Has Been Removed to the Extent Practicable, Media-Specific Criteria for Vapor Intrusion to Indoor Air, Media-Specific Criteria for Direct Contact and Outdoor Air Criteria.**

Request for Additional Soil Borings

ACDEH requested additional soil borings at the locations of the former fuel underground storage tank (UST) pit, former used-oil UST (relocated 1967), former used-oil UST (removed 1988), patched cutout, and the two existing hoists in the work bays. GHD proposes advancing hand auger soil borings in the locations of the two former used-oil USTs to collect shallow soil samples. No additional borings are proposed in the former fuel UST pit because soil between the surface and 10 feet below ground (fbg) would be fill material. As proposed in the February 2017 Work Plan, shallow soil samples will be collected from the well borings proposed upgradient and downgradient of the former UST pit to assess conditions in the area of the former UST pit.

No additional borings are proposed in the location of the patched cutout because it is located in the building that was not a part of the property that was leased by Standard Oil Company of California (Standard) and is unrelated to service station operations. No additional borings are proposed at the



locations of the two existing hoists in the work bays. These work bays are a part of the current auto service facility, and not associated with former service station operations during Standard's tenancy.

Soil Sample Collection for Analysis

LTCP requires soil samples be collected between the surface and 5 fbg and between 5 and 10 fbg. Soil samples will be collected at approximately 3 fbg from the two additional soil borings. A soil sample will be collected at approximately 8 fbg from the soil boring advanced in the location of the former used-oil UST removed in 1967. Two soil samples were collected at 9 fbg when the former used-oil UST was removed in 1988; therefore no additional soil sample between 5 and 10 fbg is proposed in this location.

Soil Sample Analysis

Soil samples collected from the soil borings advanced at the locations of the former used-oil USTs will be analyzed for poly-aromatic hydrocarbons (PAHs). Soil samples collected from the proposed well borings will not be analyzed for PAHs because they are located in the areas of the former dispenser and fuel USTs and based on analytical data collected from beneath the former used-oil USTs there is no evidence of a used-oil release. Soil samples collected from all 12 borings advanced in 2016 were analyzed for wear metals and soil samples collected from B-1, B-2, B-3, and B-5 were analyzed for polychlorinated biphenyl (PCBs). No additional analysis for wear metals and PCBs is warranted based on the following.

- None of the detected wear metal concentrations (cadmium, chromium, lead, nickel, and zinc) exceeded the environmental screening levels (ESLs).
- No PCBs were detected in the four soil samples.

1.2 LTCP Media-Specific Criteria for Groundwater

ACDEH requests groundwater samples collected from the groundwater monitoring wells be analyzed for full scan EPA Method 8260B volatile organic compounds (VOCs) due to the presence of former used-oil USTs at the site. This request does not appear warranted based on the fact grab-groundwater samples collected during the April 2016 soil boring investigation were analyzed for full scan VOCs. The only VOCs with established environmental screening levels (ESLs) detected in those samples were benzene, toluene ethylbenzene, xylenes (BTEX) and naphthalene (B-10 and B-12 only) and tetrachloroethylene (PCE) (B-1 and B-12 only). BTEX and naphthalene will be analyzed per the work plan. No additional VOCs will be analyzed based on the following:

- PCE was only detected in B-1 located adjacent to an existing hoist at 3.9 micrograms per liter ($\mu\text{g/L}$) which is just above the ESL of 3 $\mu\text{g/L}$, and in B-12 at 0.81 $\mu\text{g/L}$ which is one order of magnitude below the ESL.
- The only other VOCs detected were isopropylbenzene, n-propylbenzene, 1,3,5-trimethylbenzene, tert-butylbenzene, 1,2,4-trimethylbenzene, p-Isopropyltoluene (B-10 and B-12 only); however, no ESLs have been established for these constituents and concentrations detected do not warrant additional analysis.

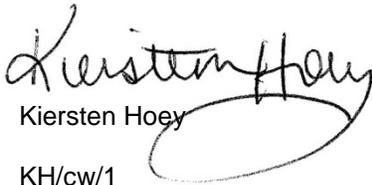


2. Closing and Schedule

Following approval, GHD will conduct the proposed work after obtaining the required permits and an access agreement with the current property owner. GHD will notify ACDEH when the assessment will take place and if there are any delays. Please contact Carryl MacLeod of CEMC at (925) 842-3201 or Kiersten Hoey of GHD at (510) 510-3347 if you have any questions or require additional information.

Sincerely,

GHD


Kiersten Hoey

KH/cw/1
Encl.

Figure 1 Vicinity Map
Figure 2 Site Plan

Attachment A Regulatory Letter

cc: Carryl MacLeod, CEMC (*electronic copy*)
M.J Garfinkel and Susan G. Block et al, 352 Capetown Drive, Alameda, CA 94502


Greg Barclay PG 6260

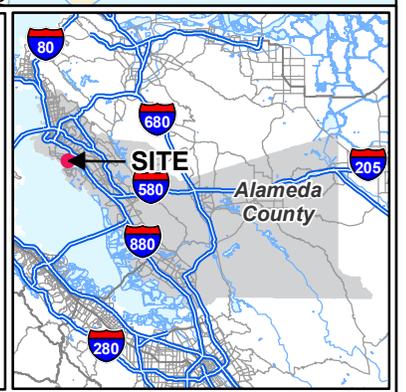
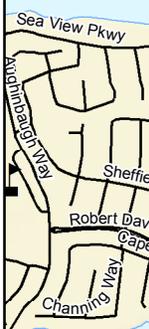


Figures

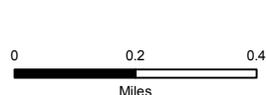


Legend

- Education Facility
- Emergency Response & Law Enforcement
- Health and Medical
- Railroad
- Stream
- Elevation (ft amsl) - 20' Intervals
- Government / Military Land



Sources: 2015 TIGER/Line Shapefiles, prepared by the U.S. Census Bureau. U.S. Geological Survey, National Geospatial Technical Operations Center, 2015. ESRI Base Data.

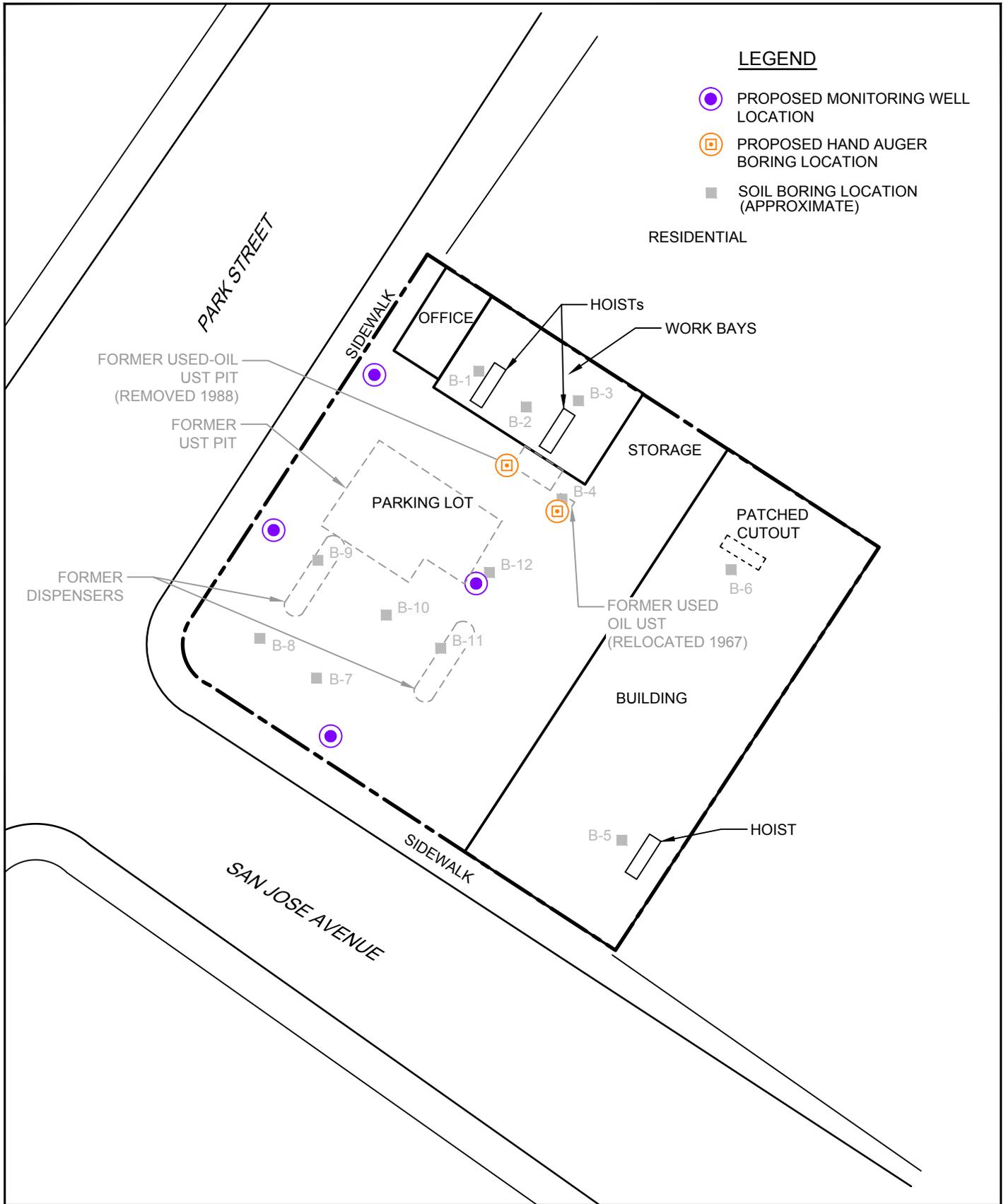


FORMER CHEVRON STATION 90955
 1200 PARK STREET
 ALAMEDA, CALIFORNIA

11119162-2016
 Dec 21, 2016

SITE LOCATION MAP

FIGURE 1



Base Source: Moore Twining Associates, INC. Site Plan Dated 5/3/16. Microsoft Product Screen Shot(s) Reprinted with permission from Microsoft Corporation, Acquisition Date Oct/2013 - Nov/2013, Accessed: 2016



Coordinate System:
California State
Plane Zone 3



FORMER CHEVRON STATION 90955
1200 PARK STREET
ALAMEDA, CALIFORNIA

SITE PLAN

11119162-2016

Apr 20, 2017

FIGURE 2

Attachment A Regulatory Letter



April 7, 2017 (Revised)

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

Ms. Nicole Arceneaux (Sent via e-mail to: Nicole.Arceneaux@chevron.com)
Ms. Carryl MacLeod (Sent via E-mail to: cmacleod@chevron.com)
Chevron Environmental Management Company
6001 Bollinger Canyon Road
San Ramon, CA 94583

Subject: Technical Report 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 to Alameda County Department of Environmental Health's (ACDEH) the following documents:

- January 20, 2017 *Summary of Findings for Property History and Chemical Use Information Research for 1200 Park Street, 1210 Park Street, 1222 Park Street, and 2407 San Jose Avenue, Alameda, CA* prepared and submitted by Terraphase Engineering on behalf of the Garfinkle Trust
- February 3, 2017 *Work Plan for Additional Site Assessment (Work Plan)* prepared and submitted by GHD for Chevron Environmental Management Company (CEMC)

Thank you for claiming your case in Geotracker. In the December 2016 Directive Letter ACDEH provided the summary of an analysis of the case file in comparison to the State Water Resources Control Board's Low Threat Closure Policy (LTCP). ACDEH determined that the site does not meet the LTCP General Criteria d (Free Product Removal), e (Site Conceptual Model), f (Secondary Source Removal), and the Media-Specific Criteria for Groundwater, the Media-Specific Criteria for Vapor Intrusion to Indoor Air, and the Media-Specific Criteria for Direct Contact and Outdoor Air Exposure.

TECHNICAL COMMENTS

The Work Plan proposes the installation of four groundwater monitoring wells which should provide data supporting the Media Specific Criteria for Groundwater. However, to enable data collection to satisfy the LTCP in the fewest mobilizations possible, please address the following technical comments by submitting by e-mail (attention Karel Detterman, karel.detterman@acgov.org) a Work Plan Addendum which will be comprised of a revised Figure 2 by the date requested below. The additional borings requested below are to be performed in accordance with the Work Plan's Attachment C, *Standard Field Procedures for Soil Boring and Monitoring Well Installation*.

1. **LTCP General Criteria b (Unauthorized Release Consists Only of Petroleum), General Criteria d (Free Product), General Criteria f – Secondary Source Has Been Removed to the Extent Practicable, Media Specific Criteria for Vapor Intrusion to Indoor Air, Media Specific Criteria for Direct Contact and Outdoor Air Criteria:**

Figure 2 of the Work Plan indicates the location of historic former UST appurtenances (*Former UST Pit*, the *Former Used Oil UST (Relocated 1967)*, *Former Used-Oil UST Pit (Removed 1988)*, the *Former Dispensers*, the current hoists, a *Patched Cutout*), the ten 2016 bores, and the proposed locations of four new groundwater monitoring wells. Data gaps concerning the investigation of former source areas are apparent when the locations of the ten soil bores are superimposed on the locations of the former service station infrastructure. The Work Plan's Site History provides a summary of the installation and removal history, however there appears to be ambiguity regarding the relocation of a 550-gallon used-oil underground storage tank (UST) in 1967, specifically the location of the used-oil UST *prior* to relocation. ACDEH is not confident that all suspected source areas have been investigated.

a. **Request for Additional Soil Borings:** To satisfy the LTCP criteria, ACDEH requests the addition of soil borings in the following locations:

- I. *Former UST Pit*;
- II. *Former Used Oil UST (Relocated 1967)*;
- III. *Former Used-Oil UST Pit (Removed 1988)*;
- IV. *Patched Cutout*;
- V. The two existing hoists in the *Work Bays*.

b. **Soil Sample Collection for Analysis:** Soil samples from the 2016 ten soil borings were collected at 10 feet or greater below surface grade (bgs); however, the LTCP Media-Specific Criteria for Vapor Intrusion to Indoor Air and the Media-Specific Criteria for Direct Contact and Outdoor Air Exposure requires analysis of soil samples between the surface and 5 feet bgs and 5 to 10 feet bgs. To satisfy the LTCP Media-Specific Criteria for Vapor Intrusion to Indoor Air and the Media-Specific Criteria for Direct Contact and Outdoor Air Exposure, ACDEH requests the analysis of all soil samples collected between the surface and 5 feet bgs and 5 to 10 feet bgs.

c. **Soil Sample Analysis:** ACDEH generally concurs with the proposed analytical suite proposed in the Work Plan; however, due to the historic presence of waste oil USTs and the uncertainty in historical waste oil UST locations, ACDEH requests analysis of all soil samples for Poly-Aromatic Hydrocarbons (PAHs) with the Selected Ion Monitoring (SIM) mode to ensure that the detection levels of PAHs are below the concentrations specified in the LTCP for Direct Contact and Outdoor Air Exposure. Additionally, please include analysis for wear metals and polychlorinated biphenyl (PCBs) because of the presence of hoists and waste oil USTs.

2. **LTCP Media Specific Criteria for Groundwater:** Upon completion of well installation and development, please collect groundwater samples on a quarterly basis for a minimum of one year to establish groundwater gradient direction trends and seasonal fluctuations. Please include a rose diagram, a groundwater gradient figure, and isoconcentration figures with the quarterly monitoring and sampling reports documenting each quarterly event.

a. Due to the on-site presence of at least two former waste oil USTs, in addition to the chemical analysis proposed in the Work Plan, all groundwater samples are requested to be analyzed for full scan EPA Method 8260B volatile organic compounds (VOCs). ACDEH may request discontinuation of the groundwater analysis for EPA Method 8260B depending on the results.

Ladies and Gentlemen
RO0003230
April 7, 2017, Page 3

TECHNICAL REPORT REQUEST

Please submit by e-mail (attention Karel Detterman, karel.detterman@acgov.org) a Work Plan Addendum which will be comprised of a revised Figure 2 by the date requested below. The additional requested borings are to be performed in accordance with the Work Plan's Attachment C, *Standard Field Procedures for Soil Boring and Monitoring Well Installation*.

- **May 12, 2017** – Revised Figure 2

Upon approval of the revised Figure 2, please upload the revised Figure 2 to the ACDEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **Date to be provided upon approval** – Data Gap Investigation Work Plan Addendum and Site Conceptual Model
File to be named: RO3230_WP_ADEND_SCM_R_yyyy-mm-dd

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

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

Please note that ACDEH has updated Attachment 1 regarding report submittals to ACDEH. ACDEH will now require a Submittal Acknowledgement Statement, replacing the Perjury Statement, as a cover letter signed by the Responsible Party. The language for the Submittal Acknowledgement Statement is as follows:

I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the SWRCB's Geotracker Website. Please make this change to your submittals to ACDEH.

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,



Digitally signed by Karel Detterman
DN: cn=Karel Detterman, o, ou,
email=karel.detterman@acgov.org, c=US
Date: 2017.04.10 17:57:14 -07'00'

Karel Detterman, PG
Hazardous Materials Specialist

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

Ladies and Gentlemen
RO0003230
April 7, 2017, Page 4

cc: Kiersten Hoey, GHD, 5900 Hollis Street, Suite A, Emeryville, CA 94608 (Sent via e-mail to: Kiersten.hoey@ghd.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

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) 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 File Transfer Protocol (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 SCP 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 (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/) for more information on these requirements.

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 ACDEH's FTP server and the SWRCB's GeoTracker website." 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 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. 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. 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

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: December 1, 2016
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP 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 deh.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) Open File Explorer using the Windows  key + E keyboard shortcut.
 - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) On the address bar, type in <ftp://alcoftp1.acgov.org>.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
 - d) Click Log On.
 - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - f) 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 deh.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.