
San Francisco Bay Regional Water Quality Control Board

December 16, 2015
File No. 07S0204 (KEB)

Chevron U.S.A. Inc.
c/o Chevron Environmental Management Company
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**SUBJECT: Transmittal of Tentative Order – Amended Site Cleanup Requirements for
1705 Contra Costa Boulevard, Pleasant Hill, Contra Costa County**

Dear Addressees:

Attached is a Tentative Order to amend the Site Cleanup Requirements (SCR) for the subject site. This transmittal letter is addressed to the named dischargers listed in SCR Order No. R2-2014-0042. The Tentative Order will also be posted on the following Regional Water Board webpage:

http://www.waterboards.ca.gov/sanfranciscobay/public_notices/#sitecleanup

Any written comments by you or interested persons must be submitted to the Regional Water Board offices by January 15, 2016. Comments submitted after this date will not be considered by the Regional Water Board.

Pursuant to section 2050(c) of Title 23 of the California Code of Regulations, any party that challenges the Regional Water Board's action on this matter through a petition to the State Water Board under Water Code section 13320 will be limited to raising only those substantive issues or objections that were raised before the Regional Water Board at the public hearing or in timely submitted written correspondence delivered to the Regional Water Board (see above).

If you have any questions, please contact Kevin Brown of my staff at (510) 622-2358 [e-mail kebrown@waterboards.ca.gov].

Sincerely,

Bruce H. Wolfe
Executive Officer

Attachment: Tentative Order

cc w/attachment: Mailing List

Mailing List

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

TENTATIVE ORDER

AMENDMENT OF SITE CLEANUP REQUIREMENTS (ORDER NO. R2-2014-0042) for:

**CHEVRON U.S.A. INC. and
MB ENTERPRISES, INC.**

For the property located at:

**1705 CONTRA COSTA BOULEVARD
PLEASANT HILL, CONTRA COSTA COUNTY**

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter the Regional Water Board), finds that:

1. **Regional Water Board Order:** The Regional Water Board adopted Site Cleanup Requirements for this site on November 12, 2014 (Order No. R2-2014-0042, hereinafter the “Order”). The Order names Chevron U.S.A. Inc. and MB Enterprises, Inc. as Dischargers. The Order requires the Dischargers to complete onsite and offsite remedial investigations and prepare a remedial action plan.
2. **Reasons for Amendment:** This Amendment is needed due to additional information obtained by the Dischargers while implementing tasks in the Order. To the extent the tasks in this Amendment are ordered pursuant to Water Code section 13267, the burden, including costs, of conducting these activities bears a reasonable relationship to the need for the information and the benefits to be obtained from it. Specifically, the contamination at the site poses a threat to human health and compliance with this Amendment will identify and abate those threats.
 - a. Remedial Investigation
Task 4 of the Order requires the Dischargers to submit a technical report, acceptable to the Executive Officer, to “define the vertical and lateral extent of pollution down to concentrations at or below typical cleanup standards for soil, soil vapor, and groundwater.” On October 22, 2015, Chevron U.S.A. Inc. issued a technical report (*Site Investigation Report and Updated Site Conceptual Model*), prepared by GHD, to comply with Task 4. The report indicates multiple chlorinated volatile organic compounds (CVOCs), including tetrachloroethylene (PCE), trichloroethylene (TCE), cis-1,2-dichloroethylene (cis-1,2-DCE), and vinyl chloride were detected in onsite and offsite soil, soil vapor, and groundwater at concentrations significantly above risk-based standards (e.g., Maximum Contaminant Levels [MCLs] and Environmental Screening Levels [ESLs]).

During the most recent remedial investigation, PCE and TCE were detected at concentrations up to 4,100 µg/L and 840 µg/L in shallow groundwater. In comparison, the MCL for both PCE and TCE is 5 µg/L. Soil vapor samples were collected onsite and offsite above the shallow groundwater at depths of 5 and 7.5 feet below grade, and most of the CVOC concentrations in these samples exceeded applicable soil vapor ESLs. The extent of CVOCs in groundwater and soil vapor remains undefined to applicable drinking water standards and relevant human health screening levels. The lateral extent of CVOCs in groundwater is undefined to the north, northwest, and west. The vertical extent of CVOCs in groundwater is undefined, both onsite and offsite, below a depth of approximately 33 feet. The lateral and vertical extent of CVOCs in soil vapor remains undefined to the north, northwest, and west of the site. Additional remedial investigation is needed.

b. Interim Remedial Actions

The GHD report indicates that the recent soil vapor samples substantially exceeded the commercial ESLs for various CVOCs. The following table shows the maximum concentrations of PCE, TCE, cis-1,2-DCE, and vinyl chloride detected in the latest soil vapor samples, along with the corresponding commercial ESLs:

CVOC	Soil Vapor Concentration (µg/m³)	ESL (µg/m³)
PCE	74,000,000	2,100
TCE	3,300,000	3,000
cis-1,2-DCE	1,300,000	31,000
vinyl chloride	790,000	160

Of particular note, in seven offsite soil vapor samples collected near existing commercial buildings, TCE was detected in excess of 8,000 µg/m³, the screening level recommended in staff’s October 16, 2014, technical memorandum to trigger the collection of indoor air data.

The CVOCs detected in soil vapor pose a significant potential vapor intrusion threat to onsite and offsite building occupants. The GHD report prudently recommends “concurrent sub-slab, soil vapor, indoor air and outdoor air sampling” for several offsite commercial buildings, including 1710 Linda Drive, 1806 Linda Drive, and the southern part of the Gregory Village Shopping Center. The GHD report also states that “additional soil vapor assessment is warranted west of VP-8 and VP-9 and south of VP-9.”

If soil vapor or indoor air concentration data obtained during the additional remedial investigation demonstrates a clear vapor intrusion threat, the Dischargers will need to implement Interim Remedial Measures (IRMs), such as HVAC optimization, indoor air treatment, subslab depressurization, or a combination of these controls, to protect human health.

c. Self-Monitoring Program

The current Order does not include a Self-Monitoring Program. Because of the high levels of CVOCs detected at the site, recently installed and future soil vapor probes and

groundwater monitoring wells must be sampled on a consistent basis to provide information on the nature and extent of CVOCs in soil vapor and groundwater and to assure adequate protection of public health and the environment. Data generated by the monitoring can further aid in identifying appropriate site-specific cleanup and abatement measures, and to aid in evaluating the effectiveness of interim and final remedial actions.

3. **California Safe Drinking Water Policy:** It is the policy of the State of California that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes. The Order promotes that policy by requiring discharges to be remediated such that MCLs (designed to protect human health and ensure that water is safe for domestic use) are met in existing and future supply wells.
4. **CEQA:** This action makes technical amendments to an order that enforces the laws and regulations administered by the Regional Water Board. Amendment of the Order is not a project as defined in the California Environmental Quality Act (CEQA). There is no possibility that the activity in question may have a significant effect on the environment. (Cal. Code Regs., tit. 14 §§ 15378 and 15061, subd. (b) (3).)
5. **Notification:** The Regional Water Board has notified the Dischargers and all interested agencies and persons of its intent under Water Code section 13304 to amend site cleanup requirements for the discharge, and has provided them with an opportunity to submit their written comments.

IT IS HEREBY ORDERED, pursuant to sections 13304 and 13267 of the Water Code, that Order No. R2-2014-0042 shall be amended as follows:

- A. Tasks 4.1 through 4.6 are added as follows:

Task 4.1 – GROUNDWATER INVESTIGATION WORK PLAN

COMPLIANCE DATE: 45 days following Executive Officer requirement

Submit a Work Plan acceptable to the Executive Officer to complete the definition of the vertical and lateral extent of onsite and offsite groundwater pollution. The Work Plan shall specify investigation methods and a proposed time schedule. The Executive Officer will require this work plan if the previous phase of the remedial investigation did not adequately define the vertical and lateral extent of groundwater pollution (e.g., preliminary cleanup goals were exceeded at the most distant groundwater sampling points).

Task 4.2 – GROUNDWATER INVESTIGATION REPORT

COMPLIANCE DATE: According to schedule in Task 4.1 Work Plan approved by the Executive Officer

Submit a technical report acceptable to the Executive Officer describing the implementation of the Task 4.1 Work Plan.

Task 4.3 –VAPOR INTRUSION WORK PLAN

COMPLIANCE DATE: 30 days following Executive Officer requirement

Submit a Work Plan acceptable to the Executive Officer to further characterize the extent of CVOCs in onsite and offsite soil vapor, and to evaluate subslab soil vapor and indoor air concentrations, including 1705 Contra Costa Boulevard, 1710 Linda Drive, 1806 Linda Drive, and the southern part of the Gregory Village Shopping Center, as discussed in the GHD report. The Work Plan shall specify investigation methods and a proposed time schedule.

Task 4.4 – VAPOR INTRUSION REPORT

COMPLIANCE DATE: According to schedule in Task 4.3 Work Plan approved by the Executive Officer

Submit a technical report acceptable to the Executive Officer describing the implementation of the Task 4.3 Work Plan.

Task 4.5 – IRM WORK PLAN

COMPLIANCE DATE: 45 days following Executive Officer approval of the Task 4.4 report

Submit a Work Plan acceptable to the Executive Officer to evaluate IRMs for soil vapor contamination, both onsite and offsite, and recommend alternatives for implementation. The Work Plan shall specify a proposed time schedule for implementation of the IRMs. The Executive Officer will require this Work Plan if the Task 4.4 report demonstrates that subslab and/or indoor air concentrations are above relevant ESLs for the contaminants of concern.

Task 4.6 – IRM REPORT

COMPLIANCE DATE: According to schedule in Task 4.5 Work Plan approved by the Executive Officer

Submit a technical report acceptable to the Executive Officer documenting completion of the Task 4.5 Work Plan. For ongoing IRMs, such as subslab depressurization, the report shall document startup, monitoring, and ongoing operations.

B. Provision 5 is revised as follows:

Self-Monitoring Program: The Dischargers shall comply with the attached Self-Monitoring Program, as may be amended by the Executive Officer.

I, Bruce H. Wolfe, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on _____.

Bruce H. Wolfe
Executive Officer

FAILURE TO COMPLY WITH THE REQUIREMENTS OF THIS ORDER MAY SUBJECT YOU TO ENFORCEMENT ACTION, INCLUDING BUT NOT LIMITED TO: IMPOSITION OF ADMINISTRATIVE CIVIL LIABILITY UNDER WATER CODE SECTIONS 13268 OR 13350, OR REFERRAL TO THE ATTORNEY GENERAL FOR INJUNCTIVE RELIEF OR CIVIL OR CRIMINAL LIABILITY

Attachment: Self-Monitoring Program

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD SAN
FRANCISCO BAY REGION

SELF-MONITORING PROGRAM for:

**CHEVRON U.S.A. INC. and
MB ENTERPRISES, INC.**

For the property located at:

**1705 CONTRA COSTA BOULEVARD
PLEASANT HILL, CONTRA COSTA COUNTY**

1. **Authority and Purpose:** The Regional Water Board requests the technical reports required in this Self-Monitoring Program (SMP) pursuant to Water Code sections 13267 and 13304. This Self-Monitoring Program is intended to document compliance with Regional Water Board Order No. R2-2014-0042 (Site Cleanup Requirements).

2. **Groundwater Monitoring:** The Dischargers shall measure groundwater elevations quarterly in all monitoring wells, and shall collect and analyze representative samples of groundwater according to the following table:

Well #	Sampling Frequency	Analyses	Well #	Sampling Frequency	Analyses
CW-1A	Q	8260B	CW-7A	Q	8260B
CW-1B	Q	8260B	CW-7B	Q	8260B
CW-2A	Q	8260B	CW-8A	Q	8260B
CW-2B	Q	8260B	CW-8B	Q	8260B
CW-3A	Q	8260B	CW-9A	Q	8260B
CW-3B	Q	8260B	CW-10A	Q	8260B
CW-4A	Q	8260B	CW-10B	Q	8260B
CW-4B	Q	8260B	CW-11A	Q	8260B
EA-5	Q	8260B	CW-12A	Q	8260B
CW-6A	Q	8260B	CW-13A	Q	8260B
CW-6B	Q	8260B			

Key: Q = Quarterly
8260B = EPA Method 8260B, full scan, or equivalent

The Dischargers shall sample any new monitoring or extraction wells quarterly, and analyze groundwater samples for the same constituents as shown in the above table and including annual sampling of wells for TPH-gasoline, benzene, ethylbenzene, toluene, ethylbenzene, and MtBE. The Dischargers may provide a written proposal to change the sampling requirements in this Order; any proposed changes are subject to Executive Officer approval. Additionally, the monitoring program described above may be modified for performance monitoring purposes when remedial actions are implemented.

3. **Soil Vapor Monitoring:** Permanent soil vapor probes shall be monitored as described in the following table to document trends in vapor concentrations for evaluating the soil vapor intrusion pathway for CVOCs. Soil vapor sampling activities shall be implemented in accordance with the *Advisory – Active Soil Gas Investigations* (DTSC, July 2015). Reporting limits shall be equal to or less than Environmental Screening Levels for shallow soil gas in a commercial land use setting.

The Dischargers shall collect and analyze representative samples of soil vapor in all probes according to EPA Method TO-15, or the equivalent, and the following schedule:

Vapor Probe #	Sampling Frequency	Analyses	Vapor Probe #	Sampling Frequency	Analyses
VP-1	Q	TO-15	VP-8	Q	TO-15
VP-2	Q	TO-15	VP-9	Q	TO-15
VP-3	Q	TO-15	VP-10	Q	TO-15
VP-4	Q	TO-15	VP-11	Q	TO-15
VP-5	Q	TO-15	VP-12	Q	TO-15
VP-6	Q	TO-15	VP-13	Q	TO-15
VP-7	Q	TO-15			

Key: Q = Quarterly
 TO-15 = EPA Method TO-15, full scan, or equivalent

The Dischargers shall sample any new soil vapor probes quarterly, and analyze samples for the same constituents as shown in the above table. The Dischargers may propose changes in the above table; any proposed changes are subject to Executive Officer approval. Additionally, the monitoring program described above may be modified for performance monitoring purposes when remedial actions are implemented.

4. **Monitoring Reports:** Beginning with the first calendar quarter of 2016, the Dischargers shall implement the above monitoring schedule, and submit quarterly monitoring reports for both groundwater and soil vapor to the Regional Water Board no later than 45 days following a sampling event. The first quarterly monitoring report is due by May 15, 2016. Future quarterly monitoring reports for each calendar year are due by February 15, May 15, August 15, and November 15. The reports may be combined into a single report. Any

requested change in the above schedule must be approved in writing by the Regional Water Board. The reports shall include:

- a. Transmittal Letter: The transmittal letter shall discuss any violations during the reporting period and actions taken or planned to correct the problem. The letter shall be signed by the Discharger's principal executive officer or his/her duly authorized representative, but not the environmental consultant, and shall include a statement by the official, under penalty of perjury, that the report is true and correct to the best of the official's knowledge.
- b. Groundwater Elevations: Groundwater elevation data shall be presented in tabular form with: depth to groundwater (in feet below ground surface), top of casing elevations, depths to the top of well screens, length of well screens, and total depth for each well included in the monitoring program. A groundwater elevation map shall be prepared for each monitored water-bearing zone with the groundwater flow direction and calculated hydrologic gradient(s) clearly indicated in the figure(s). A complete tabulation of historical groundwater elevations shall be included in the fourth quarterly report each year.
- c. Groundwater Analyses: Groundwater sampling data shall be presented in each quarterly report. Data shall be presented in tabular form. Isoconcentration maps shall be prepared that includes the analytical data for key contaminants (e.g., PCE and TCE) for each monitored water-bearing zone, as appropriate. The report shall indicate the analytical method used, detection limits obtained for each reported constituent, and a summary of QA/QC data. Historical groundwater sampling results shall be included in the fourth quarterly report each year. Each report shall provide a text discussion and technical interpretations of the groundwater data, and describe any significant increases in contaminant concentrations since the last report, any measures proposed to address the increases, any changes to the Conceptual Site Model, and any conclusions and recommendations for future actions.
- d. Soil Vapor Analyses: Soil vapor sampling data shall be presented in each quarterly report. Data shall be presented in tabular form, and isoconcentration maps should be prepared for key contaminants (including PCE, TCE, and vinyl chloride). The report shall indicate the analytical method used, detection limits obtained for each reported constituent, and a summary of QA/QC data. Historical soil vapor sampling results shall be included in the fourth quarterly report each year. The report shall describe any significant increases in contaminant concentrations since the last report, and any measures proposed to address the increases.
- e. Groundwater Extraction: If applicable, the report shall include groundwater extraction results in tabular form, for each extraction well and for the Site as a whole, expressed in gallons per minute and total groundwater volume for the quarter. The report shall also include contaminant removal results, from groundwater extraction wells and from other remediation systems (e.g., soil vapor extraction), expressed in units of chemical mass per day and mass for the quarter.

Historical mass removal results shall be included in the fourth quarterly report each year.

- f. Status Report: The quarterly report shall describe relevant work completed during the reporting period (e.g., site investigation, interim remedial measures) and work planned for the next quarter.

5. Electronic Data Submittals/GeoTracker Reporting: Pursuant to Title 23 of the California Code of Regulations, sections 3890-3895, the following information shall be submitted electronically to the State Board's GeoTracker database:

- a. All chemical analytical results for soil, water, and vapor samples;
- b. The latitude and longitude of any permanent sampling point for which data is reported, accurate to within 1 meter and referenced to a minimum of two reference points from the California Spatial Reference System, if available;
- c. The surveyed elevation relative to a geodetic datum of any permanent sampling point;
- d. The elevation of groundwater in any permanent monitoring well relative to the surveyed elevation;
- e. A site map or maps showing the location of all sampling points;
- f. The depth of the screened interval and the length of screened interval for any permanent monitoring well;
- g. PDF copies of boring logs;
- h. PDF copies of all reports, work plans, and other documents, including the signed transmittal letter and professional certification by a California-licensed Professional Engineer (PE) or Geologist (PG).

6. Violation Reports: If the Dischargers violate conditions in the Site Cleanup Requirements, then the Dischargers shall notify the Regional Board office by telephone and email as soon as practicable once the Dischargers have knowledge of the violation. Regional Water Board staff may, depending on violation severity, require the Dischargers to submit a separate technical report on the violation within five working days of telephone notification.

7. Other Reports: The Dischargers shall notify the Regional Water Board in writing prior to any Site activities, such as construction or underground tank removal activities, which have the potential to cause further migration of contaminants or which would provide new opportunities for site investigation.

8. Record Keeping: The Dischargers or their agents shall retain data generated for the above reports, including lab results and QA/QC data, for a minimum of six years after origination and shall make them available to the Regional Water Board upon request. The six-year period of retention shall be extended during the course of any unresolved litigation regarding this discharge or when requested by the Regional Water Board.

9. SMP Revisions: Revisions to this SMP may be ordered by the Executive Officer, either on his/her own initiative or at the request of the Dischargers. Prior to making SMP revisions, the Executive Officer will consider the burden, including costs, of associated self-monitoring reports relative to the benefits to be obtained from these reports.