



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

June 6, 2016

Mr. Kia Sumner (Sent via E-mail to: [kiasumner@yahoo.com](mailto:kiasumner@yahoo.com))  
1069 Oak Hills Road  
Lafayette, CA 94549-3136

Subject: Conditional Work Plan Approval and Technical Report Request for Fuel Leak Case No. RO0000159 and Geotracker Global ID T0600100274, Mobil, 3635 13<sup>th</sup> Avenue, Oakland, CA

Dear Mr. Sumner:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case files for the above referenced site including the following documents prepared and submitted on your behalf by AEI Consultants, Inc. (AEI):

- January 15, 2015 *Monitoring Well Installation Report (Installation Report)*
- September 18, 2015 *Preliminary Draft Feasibility Study/Corrective Action Plan (Draft FS/CAP)*
- March 15, 2016 *Work Plan, Additional Site Investigation (Work Plan)*

ACDEH requested the submittal of a draft Feasibility Study/Corrective Action Plan (FS/CAP) in the June 16, 2015 Directive Letter and on July 10, 2015 ACDEH was notified that AEI Consultants (AEI) had replaced Enviro Soil Tech Consultants (ESTC) as the consultant of record. AEI informally submitted a preliminary *Draft FS/CAP* including a *Site Conceptual Model* and a *Data Gap Work Plan* for soil vapor sample collection by e-mail on September 18, 2015. During an October 20, 2015 meeting ACDEH requested submittal of the *Data Gap Work Plan* separately to facilitate additional collection for the preliminary *Draft FS/CAP* prior to finalization of the *FS/CAP*. This Directive Letter provides comments on the *Data Gap Work Plan* and the preliminary *Draft FS/CAP*.

Based on ACDEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you incorporate the following technical comments while performing the proposed work and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org)) prior to the start of field activities.

ACDEH presented our evaluation of the case files in conjunction with the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) in our October 17, 2014 directive letter. Based on ACDEH staff review, we determined the site does not meet the LTCP General Criteria d (Free Product removed to extent practicable), 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**

### **A. Work Plan:**

- 1. Proposed Soil Boring And Soil Vapor Locations:** The proposed soil and soil vapor locations SG-6 and SG-7 indicated on Figure 3 are located along the southeastern edge of the proposed residential building location and the Proposed Building Plans presented in Appendix B indicate that three bedrooms are located on the ground level of the two-story residence. ACDEH requests depiction of the locations of the three bedrooms to Figure 3 and relocation of SG-6 and SG-7 into the proposed bedroom areas. Please note that soil vapor samples must be obtained *five feet below the bottom of the proposed or existing foundation* to satisfy the LTCP.

Please clarify the purpose of proposed soil and soil vapor locations SG-4 and SG-5 on Figure 3 which are located along the southwestern property line adjacent to the neighboring apartment building (3629 13<sup>th</sup> Avenue). If the intent of the locations is to assess potential off-site vapor intrusion to indoor air of the apartment building, the soil vapor samples must be collected from a depth of *five feet below the bottom of the apartment building's foundation* to satisfy the LTCP. If the intent of the locations is to assess potential on-site vapor intrusion to indoor air of the proposed residential building, the soil vapor samples must be collected from a depth of *five feet below the bottom of the proposed foundation* to satisfy the LTCP. In the view of ACDEH, it is appropriate to collect soil vapor data to satisfy both purposes because the soil vapor data will be necessary for case closure. Therefore the addition of two soil boring and soil vapor locations would be advantageous during this field event.

Please ensure that the proposed direct measurement of soil gas your strategy is consistent with the field sampling protocols described in the Department of Toxic Substances Control's (DTSC's) Final Vapor Intrusion Guidance (October 2011). Consistent with the guidance, ACDEH requires installation of permanent vapor wells to assess temporal and seasonal variations in soil gas concentrations. Please additionally analyze each soil vapor sample location for methane.

To remain consistent with DTSC's Advisory – Active Soil Gas Investigations (July 2015) Guidelines, in addition to the Shut-In Test, please perform the Leak Test and Purge Volume Test and analyze the shroud for the tracer used. In the event of detection of the tracer in a vapor sample, DTSC provides guidelines for the acceptability of the resulting data, provided the shroud concentration is known. Please include tracer and oxygen concentrations on the assembled tables for quick referencing in the investigation report.

- 2. Soil Sample Collection and Analysis:** Because a waste oil UST had been present at the site historically, soil samples collected from borings placed in the vicinity of the former waste oil UST (SG-4 and SG-5) should be collected within the 0 to 5 feet and 5 to 10 feet bgs intervals, and should be analyzed for polyaromatic hydrocarbons (PAHs) by 8270-Selected Ion Monitoring (SIM) in addition to TPHg, Total Petroleum Hydrocarbons as Diesel (TPHd), Total Petroleum Hydrocarbons as Motor Oil (TPHmo), benzene, toluene, ethylbenzene, and xylenes (BTEX), methyl tert-butyl ether (MTBE), naphthalene, and fuel oxygenates by EPA 8260.
- 3. Soil and Groundwater Waste Management from Investigation and Semi-Annual Groundwater Monitoring and Sampling Events:** Please include a section describing management of soil and groundwater waste collection, storage, analytical profiling, and disposal

in the Soil and Groundwater Investigation Report requested below and please include signed waste disposal documentation from the Installation Report.

**B. Preliminary Draft FS/CAP:**

1. **Chemicals of Potential Concern (COPC's):** The site COPCs included petroleum hydrocarbons as gasoline, diesel, and benzene, toluene, ethylbenzene, and total xylenes (BTEX) compounds, but due to the historical presence of a waste oil UST, the list of COPCs should also include naphthalene, motor oil, the five wear metals (cadmium, chromium, nickel, lead, and zinc), semivolatile organic compounds (SVOCs), and polychlorinated biphenyl (PCBs). Please revise the list of COPCs in the updated SCM to include the waste oil UST constituents.
2. **Request for a Well Survey and Sensitive Receptor Survey:** Please provide the following figures and tables described below with the requested *Soil and Soil Vapor Investigation and Updated Site Conceptual Model*.
  - a. Please perform a well survey and sensitive receptor survey, as originally requested in the October 17, 2014 Directive Letter, 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 sources for a complete inventory of vicinity water supply wells. ACDEH requests the identification and location on a site vicinity figure all active, inactive, standby, decommissioned (sealed with concrete), unrecorded, and abandoned (improperly decommissioned or lost) wells including irrigation, water supply, industrial, dewatering, and cathodic protection wells within a 1,500-foot radius of the site. Please provide an aerial photograph-based figure indicating the numbered well locations and a table listing the numbered well locations, well owner, well address, total well depth, date installed, distance and direction for site in feet, and well use as shown in the Well Survey Map and Well Survey Results Table provided in Attachment 2.
  - b. Please identify on the site vicinity figure beneficial resources and other sensitive receptors including the downgradient Oakland Fire Station located at 3600 13<sup>th</sup> Avenue, surface water bodies, schools, hospitals, day care centers, elder care facilities, etc. Please provide an aerial photograph-based figure indicating all sensitive receptors as shown in the Well & Sensitive Receptor Survey provided in Attachment 2.
  - c. Please identify on the aerial photograph-based site vicinity figure buildings with basements, half-basements, or potential dewatering structures (such as sump pumps) as shown in the Figure 2, *Site Plan Chevron Service Station 90076 4265 Foothill Blvd., Oakland, CA* provided in Attachment 2. These structures have the potential to bring contaminated groundwater to the surface for discharge to the street or storm drain.

**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:

- **July 30, 2016** – Semiannual Groundwater Monitoring and Sampling Report, 1<sup>st</sup> Half 2016

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File to be named: RO159\_GWM\_R\_YYYY-MM-DD

- **August 10, 2016** – Soil and Soil Vapor Investigation Report and Updated Site Conceptual Model  
File to be named: RO159\_SWI\_R\_YYYY-MM-DD
- **January 30, 2017** – Semiannual Groundwater Monitoring and Sampling Report, 2<sup>nd</sup> Half 2016  
File to be named: RO159\_GWM\_R\_YYYY-MM-DD
- **July 30, 2017** – Semiannual Groundwater Monitoring and Sampling Report, 1<sup>st</sup> Half 2017  
File to be named: RO159\_GWM\_R\_YYYY-MM-DD
- **January 30, 2018** – Semiannual Groundwater Monitoring and Sampling Report, 2<sup>nd</sup> Half 2017  
File to be named: RO159\_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 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](mailto:karel.detterman@acgov.org) or call me at (510) 567-6708.

Sincerely,

Karel Detterman, PG  
Hazardous Materials Specialist

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

Attachment 2 – *Well Survey Map and Well Survey Results Table, Well & Sensitive Receptor Survey, and Figure 2, Site Plan Chevron Service Station 90076*

cc: John Williamson, 1511 Wellington Street, Oakland, CA 94602-1751  
Trent Weise, AEI Consultants, (Sent via E-mail to: [tweise@aeiconsultants.com](mailto:tweise@aeiconsultants.com))  
Jeremy Smith, AEI Consultants, (Sent via E-mail to: [jasmith@aeiconsultants.com](mailto:jasmith@aeiconsultants.com))  
Wayne Hung, AEI Consultants, (Sent via E-mail to: [whung@aeiconsultants.com](mailto:whung@aeiconsultants.com))  
Dilan Roe, ACDEH (Sent via E-mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))  
Karel Detterman, ACDEH (Sent via E-mail to: [karel.detterman@acgov.org](mailto:karel.detterman@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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) 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 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 Spills, Leaks, Investigations, and Cleanup (SLIC) 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 for more information on these requirements ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](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, 6835, 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, later 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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> May 15, 2014
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) 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

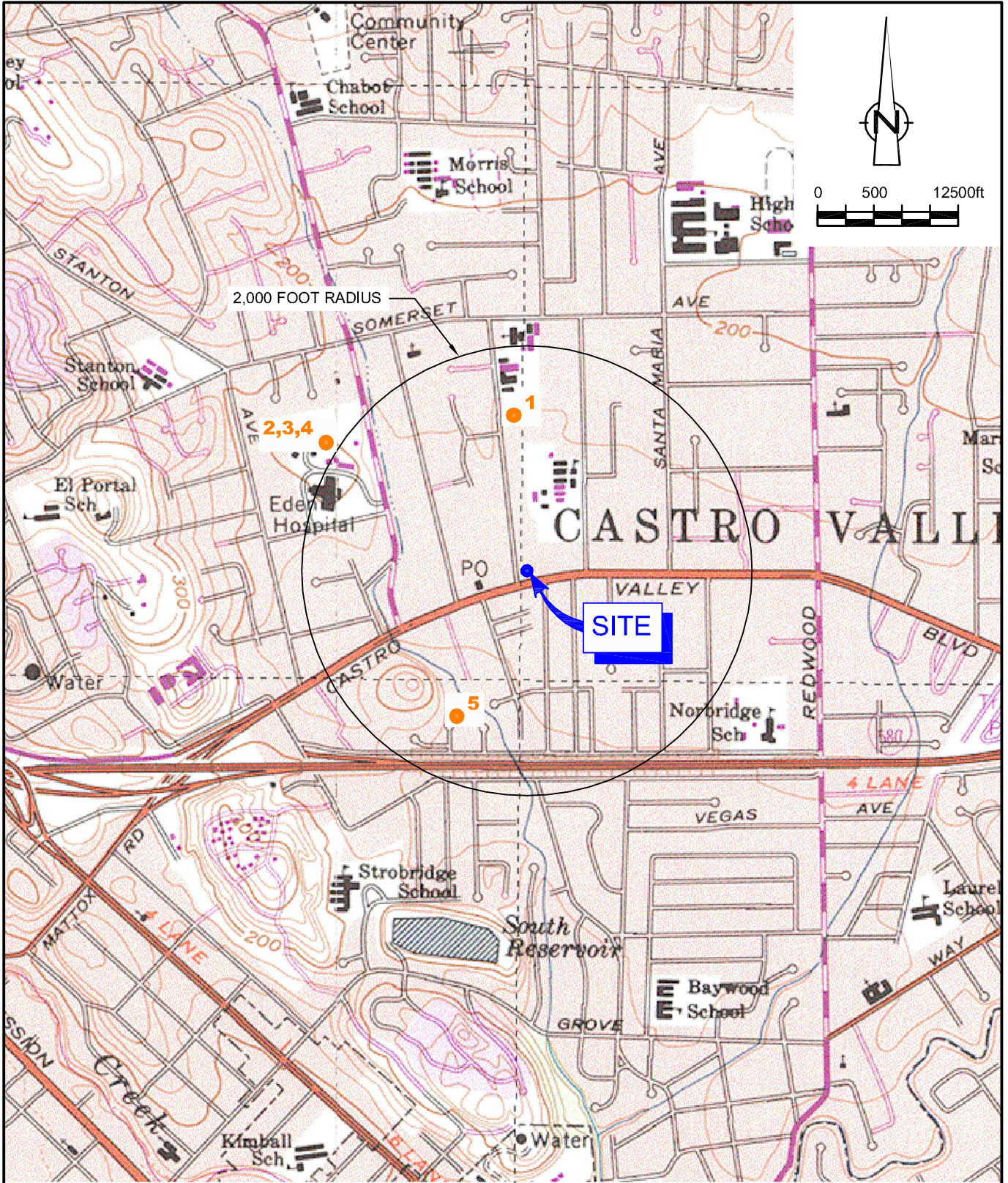
- 1) Obtain User Name and Password
  - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
    - i) Send an e-mail to [deh.loptoxic@acgov.org](mailto:deh.loptoxic@acgov.org)
  - b) In the subject line of your request, be sure 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) Using Internet Explorer (IE4+), go to <ftp://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 [deh.loptoxic@acgov.org](mailto: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.

# ATTACHMENT 2

**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.

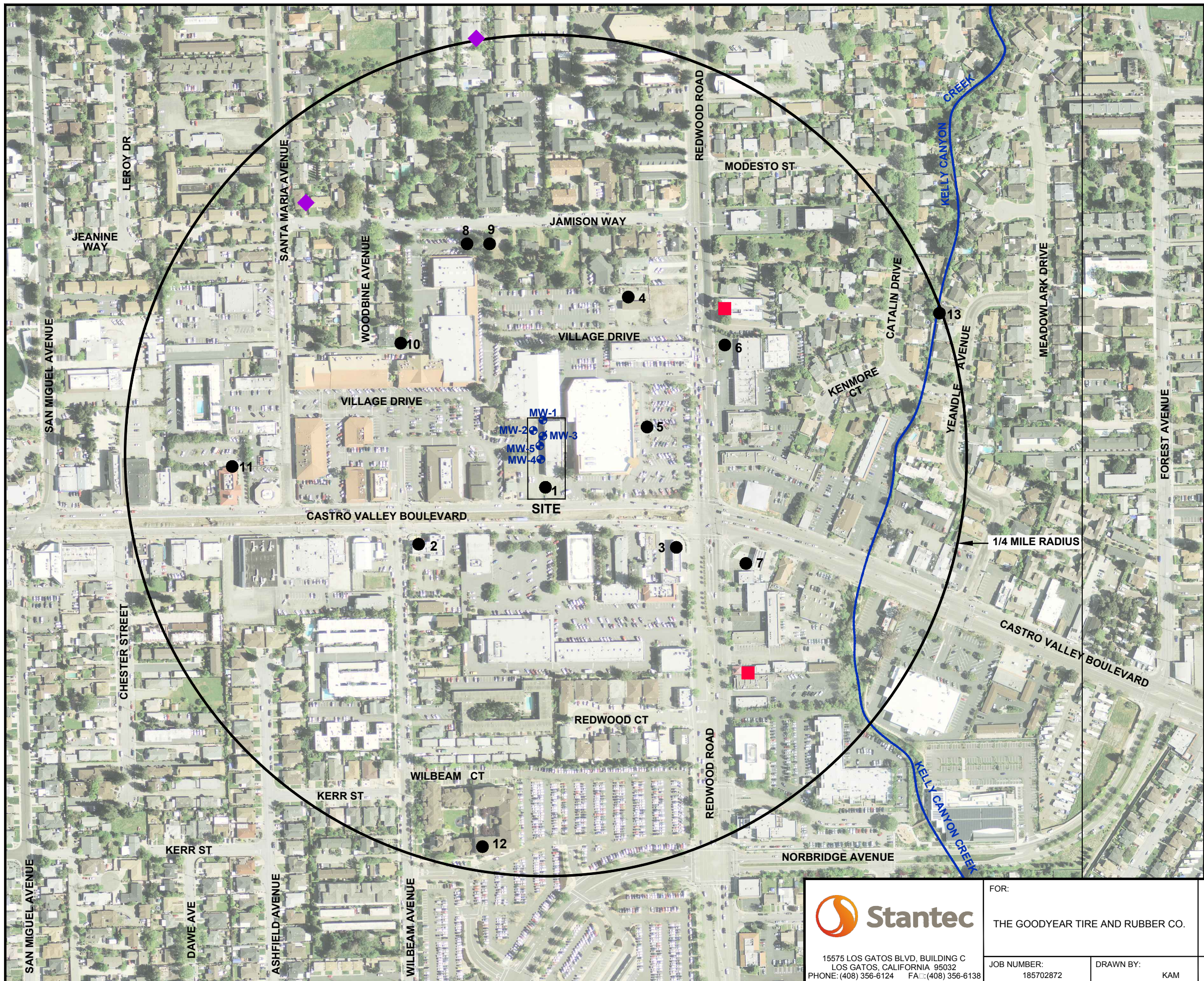
**LEGEND**

- APPROXIMATE WELL LOCATION

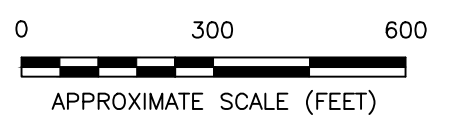



**WELL SURVEY MAP**  
**CHEVRON SERVICE STATION 9-6991**  
**2920 CASTRO VALLEY BOULEVARD**  
*Castro Valley, California*





- 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



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



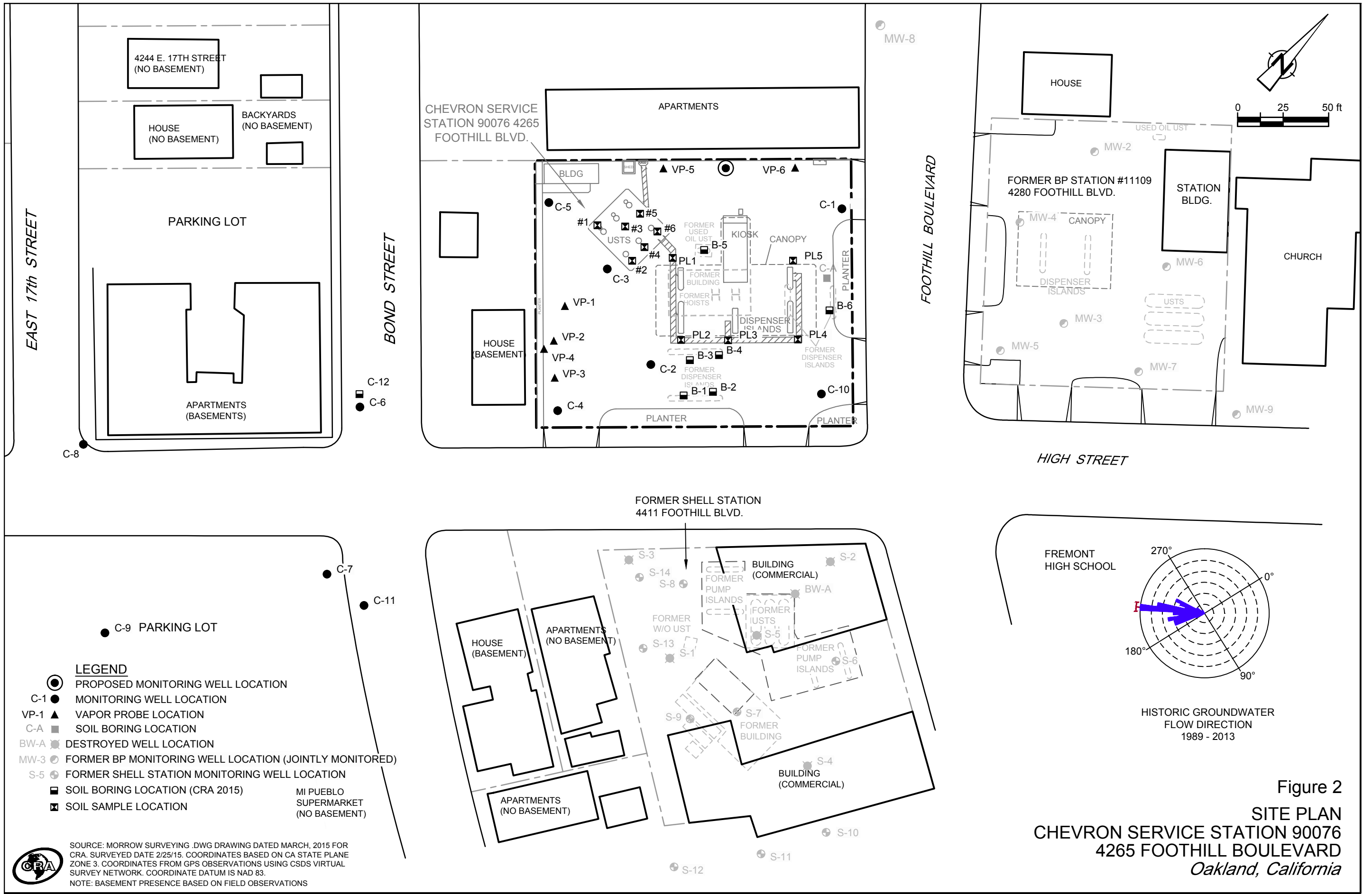


Figure 2  
 SITE PLAN  
 CHEVRON SERVICE STATION 90076  
 4265 FOOTHILL BOULEVARD  
 Oakland, California



SOURCE: MORROW SURVEYING .DWG DRAWING DATED MARCH, 2015 FOR CRA. SURVEYED DATE 2/25/15. COORDINATES BASED ON CA STATE PLANE ZONE 3. COORDINATES FROM GPS OBSERVATIONS USING CSDS VIRTUAL SURVEY NETWORK. COORDINATE DATUM IS NAD 83.  
 NOTE: BASEMENT PRESENCE BASED ON FIELD OBSERVATIONS