



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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January 12, 2012

Mr. Jose Sauchedo, Dodg Corporation
4849 East 12th Street
Oakland, CA 94601-5107

Max and Fay Smith
Unknown Address

Mr. Tony and Ms. Fee Ling Chan
78 Park Manor Drive
Daly City, CA 94015

Ms. Jennifer Sedlachek
ExxonMobil
4096 Piedmont, #194
Oakland, CA 94611
(sent via electronic mail to:
Jennifer.C.Sedlachek@exxonmobil.com)

Subject: Conditional Work Plan Approval; Fuel Leak Case No. RO0000162 and GeoTracker Global ID T0600102217, Quan's Automotive / ExxonMobil Site #70691, 10100 International Blvd / E. 14th Street, Oakland, CA

Dear Ladies and Gentlemen:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Information Submittal and Work Plan for Subsurface Investigation*, dated November 10, 2011, prepared and submitted on your behalf by ETIC Engineering, Inc. (ETIC). The work plan was submitted in response to an ACEH letter dated July 22, 2011. Thank you for submitting the work plan. Thank you also for claiming the site in Geotracker.

Based on ACEH 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 address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Work Plan Modifications** – The referenced work plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests several modifications to the approach. Please submit a report by the date specified below.
 - a. **General Work Plan Comments** - ACEH perceives the site investigation may benefit with use of rapid site assessment techniques which allow the installation of additional soil bores, using agreed upon protocols (sampling, analytical, etc.) already described in a work plan. The installation of wells, which are likely to be required ultimately at the site, would not be currently acceptable as the protocols have yet to be described for the site. The submittal of a work plan addendum would be limited to a revised site plan with either altered or additional bore locations, unless wells or other undescribed activities were to be proposed. Description of well installation methodologies, or other activities, in a work plan addendum would allow these activities to proceed, once ACEH is in agreement.

- b. **Geophysical Survey** – The work plan proposes to use geophysical methods to locate former UST excavations at the site. ACEH requests the effort be extended to include the hydraulic lift excavation, other lifts or subsurface structures, dispenser islands, and product or vent lines at the site, from all generations of USTs. These are requested to be located on future site plans.
- c. **Silica Gel Cleanup** – The work plan proposes to use silica gel cleanup (SGC) on extractable analytical testing. ACEH requests that for each soil bore a second standard (non-SGC) extractable test be run for the highest SGC result. This would include both planned carbon ranges (diesel and motor oil). These will allow a comparison of non-SGC and SGC results at the site.

ACEH additionally requests that the two highest SCG results for groundwater also be subjected to non-SGC analysis for both carbon ranges.

- d. **Soil Sample Selection Protocols** – The work plan proposes to collect and retain for laboratory analysis soil samples at the depths of 2 feet bgs, 5 ft bgs, at significant lithology changes, and the capillary fringe. To clarify and prevent miscommunication, ACEH requests these samples be analyzed as requested in the July 15, 2008 directive letter.

ACEH additionally requests the collection and analysis of soil samples to determine the vertical extent of contaminated soil beneath the site.

- e. **Groundwater Collection Protocols** – Once groundwater is encountered, the work plan proposes to wait up to 15 minutes to allow groundwater to accumulate. ACEH requests that this time specification be significantly lengthened to the extent possible, including returning later in the day to the bore location for sampling and grouting.
- f. **Bore Logging** – Only to clarify the proposed logging protocols, ACEH requests that PID readings be included on the logs.
- g. **Subsurface Clearance Protocols** – While not described in the attached protocols, and principally to clarify, ACEH requests that clearance not include air knifing due to the likelihood of volatilization of light hydrocarbon fractions. Please additionally describe the procedures utilized in the soil and groundwater investigation report requested below.

- 2. **Request for a Preferential Pathway Survey** – Because a geophysical survey is proposed to be conducted at the site, and because site parcels have an extensive history of use, ACEH requests that a preferential pathway survey also be conducted at the site. As you are likely aware, the purpose of the preferential pathway study is to locate potential migration pathways and conduits and determine the probability of a groundwater plume encountering preferential pathways and conduits that could spread contamination. Specifically ACEH requests the inclusion of utility laterals an often overlooked potential conduit. Consequently, we request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (utilities, utility laterals, pipelines, foundational, and etc.) for vertical and lateral migration that may be present in the vicinity of the site.

Discuss your analysis and interpretation of the results of the preferential pathway study (including the well survey and utility survey requested below) and report your results in the report requested below. The results of your study shall contain all information required by California Code of Regulations, Title 23, Division 3, Chapter 16, §2654(b).

- a. **Utility Survey** - An evaluation of all utility lines, utility laterals, and trenches (including sewers, storm drains, pipelines, trench backfill, foundation backfill, etc.) within and near the site and plume area(s) is required as part of your study. Please reduce, and synthesize available information and maps, and generate appropriate (vicinity and / or site specific) maps and cross-sections (if appropriate) illustrating the location and depth of all utility lines and trenches within and near the site and plume areas(s) as part of your study.

- b. Well Survey** - The preferential pathway study is requested to include a well survey of all wells (monitoring and production wells: active, inactive, standby, decommissioned (sealed with concrete), abandoned (improperly decommissioned or lost); and dewatering, drainage, and cathodic protection wells) within a ¼ mile radius of the subject site.

Please include the preferential pathway analysis in the soil and groundwater investigation report requested below.

- 3. Request for Email Addresses** – If your email address is not listed on the first page of this letter, or in the list of cc's listed below, ACEH requests your email address to help expedite communications and to help lower overall costs. Please provide that information in your next submittal.

TECHNICAL REPORT REQUEST

Please claim the site in GeoTracker and submit appropriate documents to GeoTracker and ACEH (Attention: Mark Detterman), according to the following schedule:

- **February 17, 2012** – Work Plan Addendum (if significant alterations to plans are anticipated)
- **April 6, 2012** – Soil and Groundwater Investigation Report

Should you have any questions, please contact me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark E. Detterman
Senior Hazardous Materials Specialist

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

cc: Thomas Neely, ETIC Engineering, Inc, 2285 Morello Avenue, Pleasant Hill, CA 94523
(sent via electronic mail to TNeely@eticeng.com)

Donna Drogos, ACEH, (sent via electronic mail to donna.drogos@acgov.org)
Mark Detterman, ACEH, (sent via electronic mail to mark.detterman@acgov.org)
Geotracker, Electronic 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/).

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: 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
 - 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 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.