



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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June 21, 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: Request for Limited Site Assessment Work Plan; Fuel Leak Case No. RO0000162 and GeoTracker Global ID T0600102217, Quan's Automotive / ExxonMobil Site #70691, 10100 International Blvd / E. 14th Street, Oakland, CA 94603

Dear Ladies and Gentlemen:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Preferential Pathway Survey Report*, dated April 3, 2012, and *Soil and Groundwater Investigation Report*, dated April 4, 2012. Both were prepared and submitted on your behalf by ETIC Engineering, Inc. (ETIC). Thank you for submitting the reports. The reports documented the installation of 11 soil bores, and the collection of soil and grab groundwater samples. The referenced documents detected up to 1,500 mg/kg TPHmo (1,400 mg/kg with silica gel cleanup [SGC]), 140 mg/kg TPHd (120 mg/kg with SGC), 2,000 mg/kg TPHg (chromatographic pattern does not appear to match gasoline fuel hydrocarbon pattern), and 0.00023 mg/kg benzene in proximity to the former location of an oil-water separator inside the former station building. However, in general the investigation predominately documented only trace concentrations of petroleum hydrocarbons in soil at the site, while low concentrations of petroleum hydrocarbons were detected in grab groundwater samples (up to 130 µg/l TPHd [<50 with SGC]), up to 180 µg/l TPHg, and 0.39 µg/l benzene). Fuel oxygenates and lead scavengers were not detected in these two media (however acetone, carbon disulfide, methylene chloride, PCE, and other VOCs and SVOCs were consistently detected at essentially trace concentrations). The results are encouraging for the site as a whole; however, based on the data generated a limited set of data gaps appear to be present. As a consequence, and based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below.

TECHNICAL COMMENTS

1. **Request for a Work Plan** – While grab groundwater samples were collected at each soil bore location, to do so required additional efforts including leaving the bores open for extended periods of time (all day or overnight), extending the bores to a deeper interval, or reinstalling a bore for better communication with groundwater. ACEH acknowledges the difficulty in obtaining groundwater in perched conditions; however, notes that groundwater appeared to eventually reach equilibrium on site at a depth of approximately 16 to 18 feet bgs, consistent with the depth to water at an adjacent site (Unocal #7124; RO0002444). In general the majority of temporary well screens were installed at deeper intervals due to the slowness of groundwater infiltration; thus it can be argued that the screen interval was submerged, and that while defining the vertical extent of groundwater impacts, the grab groundwater samples may not have defined the soil – groundwater interface appropriately. As a

consequence, ACEH requests the installation of a minimum of one test bore (e.g. CPT) or well capable of determining if the static groundwater level at the site is this shallow. ACEH requests the planned location also be at a location useful for delineating a groundwater plume. Please submit a limited investigation work plan by the date referenced below.

ACEH also acknowledges that the referenced site investigation has quickly assessed the lateral and vertical extent of contamination in soil based on site use over the years (multiple oil and gas services since at least the 1950's, and perhaps the 1920's); however, several data gaps are present and it appears appropriate to investigate the known areas associated onsite storage of petroleum hydrocarbons at the site. Only soil bores B4 and B13 were installed through former sources, and B4 encountered the elevated concentrations cited above, whereas B13 encountered very limited soil contamination. Source areas not investigated include the former location of the 500-gallon waste oil UST, the former fuel dispenser islands, the majority of the former fuel USTs, and the southern GPR anomaly (it is understood that this may be a foundation). It would also be appropriate to adequately investigate the former oil-water separator location due to the undocumented extent of removal, the residual contamination encountered in bore B4, and based on the presence of fill only to a depth of 8 feet bgs compared to a reported 6 foot wide by 17 feet deep source removal excavation. For these reasons ACEH requests a work plan by the date referenced below.

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:

- **August 24, 2012** – Work Plan
- **60 Days After Work Plan Approval** – 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.