



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

January 22, 2016

Ms. Rita Sullins
Don Sul, Inc.
187 North L Street
Livermore, CA 94550

Ms. Jennifer Sedlacheck (Sent via E-mail to: jennifer.c.sedlachek@exxonmobil.com)
Exxon Mobil
4096 Piedmont, #194
Oakland, CA 94611

Subject: Case File Review for Fuel Leak Case No. RO0000394 and GeoTracker Global ID T0600100116,
Arrow Rentals, 187 North L Street, Livermore, CA 94550

Dear Ms. Sullins and Ms. Sedlacheck:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including the report entitled, "*Second Semi-annual Groundwater Monitoring, Remedial Effectiveness, and Low Threat Closure Request*," dated January 6, 2016 (Report). The Report, which was prepared on behalf of Tony and Rita Sullins, Don Sul, Inc. by Ground Zero Analysis, Inc., presents results from groundwater monitoring conducted between November 16 and 18, 2015 and evaluates remediation system effectiveness. The Report includes an evaluation of the site using the State Water Resources Control Board Low-Threat Closure Policy (LTCP). From the evaluation presented, the site appears to meet the LTCP criteria; however, the Report presents limited conclusions regarding the LTCP criteria.

Based on our review of the case file and report, we request that you address the technical comments below and send us the reports requested in the Technical Report Request.

TECHNICAL COMMENTS

1. **Benzene Concentrations.** The Report indicates that benzene concentrations in groundwater have been less than 3,000 micrograms per liter ($\mu\text{g/L}$) during the past two years with the exceptions of results from wells MW-205 and MW-207 in June 2014. In June 2014, benzene concentrations in groundwater from wells MW-205 and MW-207 were 4,300 and 5,900 $\mu\text{g/L}$, respectively. Since June 2014, water levels have dropped and wells MW-205 and MW-207 have not been sampled. Recent rainfall events since November 2015 have likely caused water levels to rise. Therefore, sampling of wells MW-205 and MW-207 is likely to be possible in the near future. In order to verify that groundwater concentrations are decreasing, we request that you conduct a verification groundwater sampling event in March 2016. Operation of the remediation system is to be discontinued to allow groundwater concentrations to equilibrate prior to the groundwater sampling event. Please present the results from the groundwater sampling in the report requested below.

Responsible Parties
RO0000394
January 22, 2016
Page 2

2. **Well Survey.** The Report references a well survey performed by a previous consultant for the site in 2005. The 2005 well survey identified an unknown well 400 feet north of the site but did not identify the type of well, well construction, or potential for the well to be a receptor for the site. We request that you perform an updated well survey to confirm the assumption presented in the Groundwater Media-specific Criteria that the plume is greater than 1,000 feet from the nearest water supply well. Please present the results in the report requested below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Jerry Wickham), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **April 15, 2016** – 1st Semi-annual 2016 Groundwater Monitoring, Remedial Systems Operations Report, and Updated Low-threat Closure Evaluation Report
File to be named: GWM_R_yyyy-mm-dd RO394

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.

I will be retiring from ACEH on January 22, 2016 and Ms. Dilan Roe will be the case worker responsible for this case after January 22, 2016. Therefore, if you have any questions in the future regarding this case, please call Dilan Roe (510) 567-6767 or send her an electronic mail message at dilan.roe@acgov.org. Case files can be reviewed online at the following website: <http://www.acgov.org/aceh/index.htm>.

Sincerely,

 c/o Jerry Wickham

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Attachments: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

Responsible Parties
RO0000394
January 22, 2016
Page 3

cc: Danielle Stefani, Livermore Pleasanton Fire Department, 3560 Nevada St, Pleasanton, CA 94566
(Sent via E-mail to: dstefani@lpfire.org)

Colleen Winey (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551
(Sent via E-mail to: cwiney@zone7water.com)

Eric Uranga, City of Livermore, Economic Development, 1052 S. Livermore Ave., Livermore, CA 94550
(Sent via E-mail to: ejuranqa@ci.livermore.ca.us)

Eric Price, Ground Zero Analysis, Inc., 1172 Kansas Avenue, Suite A, Modesto, CA 95351 (Sent via E-mail to: eprice@gtienv.com)

Jenny Weese, Ground Zero Analysis, Inc., 1172 Kansas Avenue, Suite A, Modesto, CA 95351 (Sent via E-mail to: jennyw@gtienv.com)

Dilan Roe, ACEH (Sent via E-mail to: dilan.roe@acgov.org)

Jerry Wickham, ACEH (Sent via E-mail to: jerry.wickham@acgov.org)

GeoTracker, eFile

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: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 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.