



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
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August 20, 2008

Ms. Jennifer Sedlachek
ExxonMobil
4096 Piedmont Ave.
Oakland, CA 94611

Jana Gluckman
2110 Stonehaven Drive
Los Altos, CA 94024

Subject: Fuel Leak Case No. RO0000422 and Geotracker Global ID T0600100912, Mobil #04-FGN, 14994 E 14th St, San Leandro, CA 94578

Dear Ms. Sedlachek and Ms. Gluckman:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the document entitled, *Data Submittal and Request for Case Closure*, dated December 28, 2006 prepared by ETIC Engineering and *Formal Case Closure Request* dated November 23, 1998, prepared by Alton Geoscience. These reports indicate that petroleum hydrocarbon contamination remains on-site at concentrations of 2,250 micrograms per liter ($\mu\text{g/L}$) total petroleum hydrocarbons as gasoline and 18.7 $\mu\text{g/L}$ benzene in groundwater, and at a concentration of 1.2 milligrams per kilogram (mg/Kg) benzene in soil. Well MW-3A, immediately downgradient of your source area, shows increasing benzene levels and the soil vapor pathway has not been evaluated at your site. Also, the release at the waste-oil UST has not been evaluated or investigated. Perchloroethene (PCE), trichloroethene (TCE) and trans 1,2 dichloroethene (Trans 1,2- DCE) were detected in a trench in the sidewalk downgradient of the waste-oil UST but the nearby wells have not been sampled for these constituents. Based upon our review, ACEH cannot consider case closure for the subject site at this time. This decision to deny closure is subject to appeal to the State Water Resources Control Board (SWRCB), pursuant to Section 25299.39.2(b) of the Health and Safety Code (Thompson-Richter Underground Storage Tank Reform Act - Senate Bill 562). Please contact the SWRCB Underground Storage Tank Program at (916) 341-5851 for information regarding the appeals process.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Dissolved Contaminant Plume Definition.** Dissolved contaminant concentrations remaining on-site are reported at maximum concentrations of 2,250 micrograms per liter ($\mu\text{g/L}$) total petroleum hydrocarbons as gasoline and 18.7 $\mu\text{g/L}$ benzene. However, well MW-7, which is located in the sidewalk downgradient of the dispensers and waste-oil UST, immediately adjacent to your site and monitored by ConocoPhillips, has reported

concentrations of 7,100 micrograms per liter TPHg in the groundwater samples collected in March 2008. Benzene is currently below the detection limits. MW-7 is approximately downgradient of the area where PCE, TCE and Trans 1,2- DCE were detected during a utility line excavation. Well MW-7 has not been analyzed for PCE. ACEH requests an additional groundwater sampling event in order to evaluate this site for case closure. We request that you redevelop and sample the three on-site wells to determine the current concentrations. Please analyze groundwater samples for: total petroleum hydrocarbons as gasoline (TPHg) by EPA Method 8015M, benzene, toluene, ethylbenzene, toluene, xylenes, MTBE, ethyl tertiary butyl ether (ETBE), di-isopropyl ether (DIPE), tertiary amyl methyl ether (TAME), TBA, ethylene dibromide (EDB), and 1,2-dichloroethane (1,2-DCA) by EPA Method 8260. Please also analyze water samples from MW-1A and ConocoPhillips well MW-7 for PCE, TCE and Trans 1, 2 DCE.

2. **Residual Soil Contamination and Soil Vapor Migration.** Maximum concentrations of 4,100 milligrams per kilogram (mg/Kg) TPHg and 1.2 mg/Kg benzene were left in place in soil at the subject site. An evaluation of the soil vapor pathway has not been performed. ACEH requests that you submit a work plan to evaluate this data gap adjacent to the areas with residual contamination and also in the current building by the date specified below.

We recommend collecting soil vapor from a permanently installed vapor well in the areas without a building and a subslab point in the building following the Department of Toxic Substances Control and Los Angeles Regional Water Quality Control Board's January 28, 2003 *Advisory - Active Soil Gas Investigations* guidance for your soil vapor sampling. This document recommends that a tracer gas be used to ensure that samples are not comprised by leakage through the seals. An enclosure can be placed over the sample port, tubing and Summa canister so that a tracer gas be introduced and monitored during sampling. Please include the tracer gas in your sample analysis for each soil vapor sample. ACEH recommends that you use helium because of issues with isopropanol that have risen since the document was published. For information on using a sampling enclosure and helium, please refer to the New York State Department of Health's October 2006 Guidance for Evaluating Soil Vapor Intrusion in the State of New York.

3. **Waste-Oil Tank Sampling.** A waste-oil tank was present at the site however our case files do not contain the reports indicating analysis for waste-oil constituents, as per the Tri-Regional Guidelines for recommended minimum verification analysis for leaking underground tanks such as metals, total oil and grease, chlorinated hydrocarbons, etc. Please submit all reports documenting these analyses by **September 20, 2008**. If sample results are not available, ACEH requests that you prepare a work plan to investigate the waste oil tank area and the lateral and vertical extent of contamination. Please note that chlorinated volatile organic compounds were detected in an excavation conducted in the sidewalk along 150th Avenue adjacent to the site and downgradient of the former waste-oil tank.
4. **Preferential Pathway Study.** The purpose of the preferential pathway study is to locate potential migration pathways and conduits and determine the probability of the NAPL and/or plume encountering preferential pathways and conduits that could spread contamination. We request that you perform a preferential pathway study that details all of the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for vertical and lateral migration that may be present in the vicinity of the site.

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Discuss your analysis and interpretation of the results of the preferential pathway study (including the utility survey and sensitive receptor 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 and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s) is required as part of your study. Please include maps and cross-sections 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/Sensitive Receptor Survey

A well survey was performed which concluded that no wells would likely be impacted by this site. We concur with the results of your well survey. However, the well survey did not include an evaluation of whether there were other sensitive receptors in the area such as creeks, water bodies or wetlands. Please include a discussion of the nearby sensitive receptors in the report requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Barbara Jakub), according to the following schedule so that we can complete our closure review for this site:

- **September 30, 2008** – Additional Information Request (Documentation of Waste-Oil UST Characterization)
- **October 30, 2008** – Work Plan and preferential pathway survey

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.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml).

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.

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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.

If you have any questions, please call me at (510) 639-1287 or send me an electronic mail message at barbara.jakub@acgov.org.

Sincerely,



Barbara Jakub, P.G.
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Ms. Tracy Iob, ETIC Engineering, Inc., 2285 Morello Avenue, Pleasant Hill, CA 94523
Donna Drogos, ACEH
Barbara Jakub, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, 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

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- 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)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

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 dehloptoxic@acgov.org
or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
 - 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 and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - 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 dehloptoxic@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 at 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)