



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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September 24, 2013

Jennifer Sedlachek  
ExxonMobil  
4096 Piedmont, Ave., #194  
Oakland, CA 94611 (Sent via e-mail to: [jennifer.c.sedlachek@exxonmobil.com](mailto:jennifer.c.sedlachek@exxonmobil.com))

On Dan and Nathan Lam  
200 El Dorado Terrace  
San Francisco, CA 94112

Subject: Fuel Leak Case No. RO0000445 and Geotracker Global ID T0600101855, Mobil#99-105 / Cars Rent A Car, 6301 San Pablo Avenue, Oakland, CA 94608

Dear Ms. Sedlachek and Messrs. Lam:

Thank you for the recently submitted report entitled, *Corrective Action Plan Addendum (CAP Addendum)* dated May 14, 2013 prepared by Cardno ERI for the subject site. Alameda County Environmental Health (ACEH) staff has reviewed the case file including the above-mentioned reports for the above-referenced site.

The above-mentioned report addresses ACEH's technical comments on the Site Conceptual Model Update, Low-Threat Closure Evaluation, and Feasibility Study/Corrective Action Plan (CAP) dated October 25, 2012. The CAP and CAP Addendum propose conducting dual-phase extraction (DPE) from source areas where newly observed free product is present (MW-5) and maximum concentration of soil vapor were observed. ACEH generally concurs with the proposed corrective action, however requests that you address the following technical comments and send us a Groundwater and Soil Vapor Performance Monitoring Work Plan that addresses the technical comments below.

#### **TECHNICAL COMMENTS**

1. **DPE Performance Monitoring** – The CAP and CAP Addendum recommend DPE extraction from existing well MW-5 and proposed well MW-6. ACEH notes that using the monitoring wells as groundwater extraction wells does not provide for an adequate groundwater monitoring network to evaluate the effectiveness of the remedial action. Obtaining a sample from a well that is being used in remediation will not be representative of static conditions.

In an email correspondence dated September 5, 2013, Cardno ERI states that soil borings installed and sampled in 2012 are representative of groundwater conditions with respect to the lateral distribution of dissolved-phase hydrocarbons and that a groundwater performance monitoring well network is not necessary. Our review of the rose diagram indicates that groundwater flow direction has varied from northwest to south during historic groundwater monitoring events. Although these borings previously identified the downgradient extent of the groundwater contaminant plume, they were advanced prior to the recent detection of sheen and increasing total petroleum hydrocarbon as diesel (TPHd) concentrations that are indicative of free product in monitoring well MW-5. This same rationale may apply to the vicinity of proposed monitoring well MW-6 in the vicinity of vapor well VW4 that had

significantly elevated levels of petroleum hydrocarbons in soil gas. Therefore, installation of performance monitoring wells downgradient of the extraction wells in the source area is necessary.

In addition, since soil vapor is the main concern at the site, ACEH recommends that performance monitoring include post remedial monitoring for vapor more than once as proposed. ACEH recommends that the vapor wells be sampled for verification monitoring for one year after DPE events are completed. At a minimum, soil vapor monitoring should include wells VW-1, VW-4 and VW-5.

Please present a strategy and schedule for performance monitoring of both groundwater and soil vapor in the area of remediation. Please include development and sampling of new monitoring and extraction wells to collect baseline conditions prior to start-up of the DPE system.

Please update the remedial costs as appropriate to incorporate the elements discussed above.

2. **Well Installation and Soil Sampling** – The Low-Threat Closure Policy uses soil concentrations from the 0 to 5 and 5 to 10 foot interval to assess direct contact and outdoor air, since TPHd has been detected in groundwater at the site and previously no naphthalene data has been collected in soil or groundwater, please collect naphthalene data from the proposed well boring(s) and add naphthalene to the groundwater analysis in wells with historical detections of TPHd on a one time basis. Use silica gel cleanup for TPHd analysis in groundwater.
3. **Groundwater Monitoring** – Please continue semi-annual groundwater monitoring in accordance with the approved groundwater monitoring plan until the CAP is approved for the site and submit groundwater monitoring report (GWM\_R) in accordance with the schedule below.

#### **TECHNICAL REPORT REQUEST**

Please submit technical reports to ACEH (Attention: Barbara Jakub), according to the following schedule:

- **September 30, 2013** – Groundwater Monitoring Report (2<sup>nd</sup> Semi-Annual) (File to be named: GWM\_R\_YYYY-mm-dd)
- **November 15, 2013** – Groundwater and Soil Vapor Performance Monitoring Work Plan (File to be named CAP\_R\_ADEND\_YYYY-mm-dd)
- **March 1, 2014** – Groundwater Monitoring Report (1st Semi-Annual) (File to be named: GWM\_R\_YYYY-mm-dd)

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Should you have any questions or concerns regarding this correspondence or your case, please contact Dilan Roe at (510) 567-6767 or send her an electronic mail message at [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org) as I will be transferring out of the Local Oversight Program on September 27, 2013.

Sincerely,

Barbara J. Jakub, P.G.  
Hazardous Materials Specialist

Enclosure: Responsible Party(ies) Legal Requirements/Obligations  
ACEH Electronic Report Upload (ftp) Instructions

cc: Rebekah Westrup, Cardno ERI, 601 North McDowell Blvd., Petaluma, CA 94954-2312 (*Sent via e-mail to: [rwestrup@ERI-US.com](mailto:rwestrup@ERI-US.com)*)  
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (*Sent via E-mail to: [lgriffin@oaklandnet.com](mailto:lgriffin@oaklandnet.com)*)  
Dilan Roe, ACEH (*Sent via E-mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org)*)  
Barbara Jakub, ACEH (*Sent via E-mail to: [barbara.jakub@acgov.org](mailto:barbara.jakub@acgov.org)*)  
GeoTracker, 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> July 20, 2010
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 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.