



November 28, 2017

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(Sent via e-mail to: [jennifer.c.sedlachek@exxonmobil.com](mailto:jennifer.c.sedlachek@exxonmobil.com))

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

Ladies and Gentlemen:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the January 6, 2017 *Response to Request for Work Plan Addendum* (Response) prepared and submitted by Cardno in response to ACDEH's November 8, 2016 Directive Letter.

ACDEH has evaluated the case against the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on ACDEH staff review, we have determined that the site does not meet the LTCP Media-Specific Criteria for Groundwater and the Media-Specific Criteria for Vapor Intrusion to Indoor Air.

The site is occupied by an oil change facility which was built in 1999 while the site was still an open fuel leak case. ACDEH is concerned with the potential risk of vapor intrusion to indoor air in the office area in the southern end of the oil change facility, occupied by a bathroom, a storage closet, and a stair well. The bioattenuation zone is less than 5 feet at the site. Five vapor probes were installed on-site and sampled in 2010 and 2012 and both sampling events detected benzene and ethylbenzene in VW4 and VW5 in exceedance of the LTCP's Soil Gas Criteria for *No Bioattenuation Zone for Commercial Use*. Benzene concentrations up to 30,000 micrograms per cubic meter (ug/m<sup>3</sup>) and ethylbenzene concentrations of 95,000 ug/m<sup>3</sup> were detected in VW4 located outside and adjacent to the bathroom. The risk of vapor intrusion appears to be elevated in the bathroom due to the plumbing penetrations and the close proximity of VW4. Naphthalene has not been included as an analyte in the soil vapor samples.

While ACDEH and Cardno agree that additional soil vapor assessment at the site is warranted, Cardno cited potential business disruption as rationale to install three additional soil vapor probes outside the building in lieu of sub-slab vapor probes inside the building. ACDEH does not agree with this strategy because ACDEH is uncertain that additional outdoor soil vapor probes will provide meaningful evidence that vapor intrusion to indoor air is not occurring. ACDEH therefore requests submittal of a work plan addendum that addresses the following technical comments and send us the document requested below.

### **TECHNICAL COMMENTS**

- 1. Installation and sampling of indoor sub-slab probes:** ACDEH requests submittal of a work plan addendum describing the installation of permanent sub-slab probes in the southern portion of the oil change facility, especially in the bathroom. As described in DTSC's *Advisory Active Soil Gas Investigations* (July 2015), please include collection of sub-slab samples from all probes during the wet and dry seasons to evaluate seasonal variations.

2. **Soil Gas Analytes:** Please analyze the sub-slab soil gas samples as originally proposed in the *Work Plan for Additional Soil Vapor Assessment* (Work Plan) dated September 8, 2016 including confirmation analysis for naphthalene by EPA Method TO-17.
3. **Standard Operating Procedures (SOPs):** Please submit the sub-slab sampling SOPs with the Work Plan Addendum.
4. **Public Notifications:** Please include a description of tenant notification prior to sub-slab sampling in accordance with DTSC's 2012 *Vapor Intrusion Public Participation Advisory*. Please submit a draft Public Notice to ACDEH for review prior to distribution to the tenant by January 22, 2018.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACDEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **January 31, 2018** – Work Plan Addendum for *Sub-Slab Vapor Assessment*,  
File to be named: RO445\_WP\_ADEND\_R\_yyyy-mm-dd

This report is 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. Online case files are available for review at the following website:  
<http://www.acgov.org/aceh/lop/ust.htm>

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please send me an e-mail message at [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org) or call me at (510) 567-6708.

Sincerely,

Karel Detterman, PG  
Senior Hazardous Materials Specialist

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

cc: Scott Perkins, Cardno, 601 N. McDowell Blvd., Petaluma, CA 94954, (Sent via e-mail to: [Scott.Perkins@cardno.com](mailto:Scott.Perkins@cardno.com))  
Paresh Khatri, ACDEH, (Sent via e-mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org))  
Dilan Roe, ACDEH (Sent via E-mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))  
Karel Detterman, ACDEH (Sent via E-mail to: [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org))  
GeoTracker, Electronic Case 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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) 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 File Transfer Protocol (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 SCP 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 ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)) for more information on these requirements.

#### ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the SWRCB's GeoTracker website." 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 6731, 6735, and 7835) 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 licensed 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 case meet this requirement. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

#### UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, late 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 SCP)</b>	<b>REVISION DATE:</b> December 1, 2016
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions


The Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) 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) Open File Explorer using the Windows  key + E keyboard shortcut.
    - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
  - b) On the address bar, type in ftp://alcoftp1.acgov.org.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
  - d) Click Log On.
  - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - f) 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.