



June 20, 2018

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

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

Ladies and Gentlemen:

Thank you for participating in the meeting held at Alameda County Department of Environmental Health's (ACDEH) offices on February 2, 2018 attended by Jennifer Sedlachek of ExxonMobil, Scott Perkins, Jim Chappell, and David Daniels of CARDNO and for submitting the draft figure as requested during the meeting. The purpose of the meeting was to discuss ACDEH's November 28, 2017 Directive Letter requesting a Work Plan Addendum and identify the next steps to progress the case to closure.

In 1994, four 2,000 gallon gasoline underground storage tanks (USTs) and a 350 gallon waste oil UST were removed from the site. In early 1999, prior to site redevelopment as an oil change facility, the former UST pit was over excavated. In 2014, the results of a dual-phase extraction (DPE) feasibility study concluded that DPE did not produce a significant reduction in soil vapor concentration.

ACDEH is concerned that the potential risk of vapor intrusion to both on- and off-site receptors persists due to a bioattenuation zone that is less than 5 feet in thickness, the presence of elevated Total Petroleum Hydrocarbons (TPH) in soil vapor in VW-4 and VW-5, and in groundwater at MW-5 and MW-8, and the potential of TPH contamination adjacent to the former waste oil UST.

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, Vapor Intrusion to Indoor Air, or Direct Contact and Outdoor Air Exposure.

As discussed during the meeting, ACDEH requests that collection and analysis of soil vapor samples from the five existing soil vapor wells and submittal of a Work Plan Addendum that will address the following Technical Comments.

TECHNICAL COMMENTS:

Soil Vapor Sample Collection:

- 1. Collection of soil vapor samples from all probes:** Within the next 60 days, please collect soil gas samples from all five soil vapor wells VW-1 through VW-5, analyze the vapor samples for naphthalene including confirmation analysis for naphthalene by EPA Method TO-17, Total Petroleum Hydrocarbons as gasoline (TPHg), and benzene, toluene, ethylbenzene, and xylenes (BTEX), and provide a soil vapor sampling report by the date provided below. Please include the soil vapor sampling Standard Operating Procedures (SOPs) with the Soil Vapor Sampling Report. Please ensure that a tracer helium concentration of 20% is maintained throughout the vapor sampling event and is tabulated as a percentage. Please include analysis for oxygen, carbon dioxide, and methane, as included in previous sampling events.

Preparation of a Work Plan Addendum:

2. **Assessment of On- and Off-Site Vapor Intrusion:** Based on the new soil vapor results, in the Work Plan Addendum, propose actions to determine whether or not on- and off-site soil vapor intrusion is an issue. Please propose the installation of additional soil vapor wells and sub-slab wells and sample collection along the western property boundary and in the bathroom, storage closet, and stair well all located in southern end of the oil change facility.
3. **Evaluation of Soil and Groundwater Adjacent to Former Waste Oil UST:** A waste oil UST was removed in 1994; however analysis for polyromantic hydrocarbons (PAHs) including naphthalene in soil have not been evaluated; consequently, the Media-Specific Criteria for Direct Contact to Outdoor Air (DC/OA) cannot be assessed. In the Work Plan Addendum requested below, please propose the installation of a soil boring immediately adjacent to the former waste oil UST for the collection and analysis of soil and grab groundwater samples. Propose collection and analysis of soil samples to satisfy the LTCP DC/OA criteria.
4. **Update Site Conceptual Model:** Please submit an updated SCM with the Work Plan Addendum requested below to understand the relationship between site utilities and preferential pathways and potential on- and off-site contaminant migration:
 - a. **On-site Utility Survey (Completed):** Please include the recently completed on-site utility survey in the updated SCM.
 - b. **Request for Foundation and Basement Survey (In Progress):** ACDEH understands that questionnaires regarding the presence of basements or sumps were sent to the neighboring Church and four residences located to the west of the site, but, to date, responses have not been received. In the absence of questionnaire responses, please consider a Google Maps review and/or a neighborhood reconnaissance.
 - c. **Cross Sections:** As discussed in our meeting, please prepare two cross sections oriented parallel to the western property line of the site and located on either side of the Church. Please include on the cross sections the depths of utilities in the vicinity and foundation depths:
 - i. West side of the Church, utilize the borings for SVS-1, SVS-2, SVS-3, B6, B7, and B8;
 - ii. East side of the Church, a traverse along the western boundary of the site.
 - d. **Rose Diagram:** Please include an updated Rose diagram with the SCM.
5. **Groundwater Delineation Downgradient of VW-4, VW-5, MW-5, and MW-8:** Soil vapor sampling events in 2010 and 2012 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 ($\mu\text{g}/\text{m}^3$) and ethylbenzene concentrations of 95,000 $\mu\text{g}/\text{m}^3$ were detected in VW4 located outside and adjacent to the oil change facility's bathroom. Additionally, sheen/non-aqueous phase liquid (NAPL) periodically appears in MW-5 and MW-8. Please propose a strategy to define the extent of sheen/NAPL on-site in the vicinity of VW-4, VW-5, MW-5, and MW-8 in the Work Plan Addendum requested below. Please include an estimate for remaining source underneath the former station building.

TECHNICAL REPORT REQUEST

Please upload the technical reports to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule and send copies of the reports to karel.detterman@acgov.org to facilitate timely review.

- **August 24, 2018** – Soil Vapor Sampling Report
File to be named: RO445_SWI_R_yyyy-mm-dd
- **September 30, 2018** – Work Plan Addendum and Updated SCM
File to be named: RO445_WP_ADEND_SCM_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 or call me at (510) 567-6708.

Sincerely,

Karel Detterman, PG 5628
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)

Paresh Khatri, ACDEH, (Sent via e-mail to: paresh.khatri@acgov.org)

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

Karel Detterman, ACDEH (Sent via E-mail to: karel.detterman@acgov.org)

GeoTracker, Electronic Case File

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

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 the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

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 and include the professional registration stamp, signature, and statement of professional certification. 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

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.