

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
COLLEEN CHAWLA, Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
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October 23, 2018

Jennifer Sedlachek
ExxonMobil
4096 Piedmont, Ave., #194
Oakland, CA 94611

Dan On and Nathan and Binh Lam, etal
200 El Dorado Terrace
San Francisco, CA 94112-1757

(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:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *Groundwater and Soil Vapor Assessment, Updated Site Conceptual Model, and Work Plan for Additional Assessment (Work Plan)* dated August 24, 2018, prepared on your behalf by Cardno, your consultant. The goal of the *Work Plan* is to assess potential vapor intrusion (VI) to neighboring and immediately downgradient businesses and residences due to the persistent and elevated benzene concentrations in shallow groundwater at the site.

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

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.

The referenced work plan proposes a series of actions with which ACDEH is in general agreement; however, in the interest of maximizing efficiency of the drilling event, the proposed scope of work is conditionally approved for implementation provided that all of the technical comments below are addressed and/or incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: karel.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS:

- 1. Work Plan Request to assess On-Site Vapor Intrusion in the Oil Change Facility Bathroom/Office:** The Work Plan states that "while the on-site building is not an active fueling facility, the vehicle service operations conducted in the building result in similar small surface spills and fugitive vapor releases, as the ongoing activities in the on-site building likely poses a greater risk than the historical release, further evaluation of soil vapor in the vicinity of the on-site building

is not warranted given the current land use.” Based on the data, ACDEH does not agree with this rationale because the small surface spills and fugitive vapor releases from today’s site usage as an oil change facility are essentially non-volatile compounds and previous historical releases were volatile fuel compounds as demonstrated by the recent soil vapor sample results. The site does not fit the active fueling facility exemption.

A *Work Plan for Additional Soil Vapor Assessment* was submitted in September 2016 and proposed the installation of three soil vapor probes at depth of two feet depth around the southern building perimeter. The installation of soil vapor probes outside the building is not technically acceptable due to the potential of oxygen exclusion below slabs (Figure 4, LTCP Technical Justification for VI to IA) and the consequent potential for higher vapor concentrations below slabs. Additionally, soil vapor samples collected at depths less than five feet bgs may be subject to barometric pressure effects and prone to breakthrough of ambient air through the soil column (Department of Toxic Substances Control’s (DTSC’s) *Advisory Active Soil Gas Investigations*, July 2015). Soil vapor sample data collected from outdoor soil vapor probes installed at two feet bgs would provide questionable data compared to subslab probes installed within the building footprint including the bathroom as previously requested.

ACDEH understands the desire not to impact the property owner, patrons, and tenants and appreciates the suggested alternatives, however, three sampling events of VW4 detected benzene, ethylbenzene, and naphthalene soil vapor concentrations in exceedance of the LTCP’s Vapor Intrusion to Indoor Air criteria for commercial use with no bioattenuation zone. ACDEH requires preparation of a Work Plan proposing the installation and seasonal (wet-dry) sample collection of a permanent sub-slab vapor probe in the bathroom and office located in southern end of the oil change facility. Although the installation of a sub-slab probe in the office area appears unnecessary at this time because the office was being used for storage including storage of automotive chemicals, as reported in the *Work Plan*, the usage can change.

2. **DTCS Guidance Documents:** Please conduct all soil vapor sampling work in accordance with the Department of Toxic Substances Control’s (DTSC’s) *Advisory Active Soil Gas Investigations* (July 2015) and *Guidance for the Evaluation and Migration of Subsurface Vapor Intrusion to Indoor Air* (DTCS 2011). ACDEH does not accept other guidance, unless mitigating circumstances indicate it is appropriate and the supporting rationale is provided in advance.
3. **Boring B9 Former Waste Oil UST Laboratory Analysis:** For soil samples only, please request analysis for Poly-Aromatic Hydrocarbons (PAHs) with the Selected Ion Monitoring (SIM) mode to ensure that the detection levels of PAHs are below the concentrations specified in the LTCP for Direct Contact and Outdoor Air Exposure. It is not necessary to analyze groundwater samples for EPA Method 8270.

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.

- **November 30, 2018** – Sub-Slab Installation Work Plan
File to be named: RO445_WP_R_yyyy-mm-dd
- **December 24, 2018** – Soil, Soil Vapor, and Groundwater Investigation Report and updated SCM
File to be named: RO445_SWI_SCM_R_yyyy-mm-dd

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. 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.