

From: [Detterman, Karel, Env. Health](#)
To: ["Sedlachek, Jennifer C"; mashpetroleum@yahoo.com](#)
Cc: ["david.daniels@cardno.com"; Rebekah Westrup; Roe, Dilan, Env. Health; "james.chappell@cardno.com"; "Mansour Sepehr"](#)
Subject: Fuel Leak Case No. RO491 and GeoTracker Global ID T0600100552, EXXON #7-3006, 720 High Street, Oakland, CA 94601
Date: Thursday, December 19, 2013 11:23:28 AM
Attachments: [Attachment 1 and ftpUploadInstructions 2012 07 25.pdf](#)

Hello everyone:

Thank you for participating in our conference call on Tuesday during which we discussed the *Site Conceptual Model Update and Data Gap Investigation Work Plan (Work Plan)* dated 9/27/2013 prepared by Cardno ERI. The *Work Plan's* recommendations include the following:

1. Installing two groundwater monitoring wells: one in the vicinity of boring CPT2 and one downgradient from boring CPT2;
2. Updating the Sensitive Receptor Survey (SRS) to confirm the sensitive receptors as required by the State Water Resources Control Board (SWRCB's) Low Threat Closure Policy (LTCP);
3. Continued monitoring of the passive skimmer in well MW-3 for NAPL;
4. Continued semi-annual groundwater monitoring and sampling.

Based on ACEH staff review of the work plan the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed field investigation. 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 technical comments below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the reports 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. Representative Shallow Soil Samples** – The Work Plan proposes using an air tool to a depth of five to eight feet below grade surface (bgs) to clear for subsurface obstructions or utilities. Since ACEH is concerned that the use of an air tool will volatilize target compounds resulting in low-biased analytical results, please clear all boring locations by hand auguring.
- 2. Media Specific Criteria for Direct Contact and Outdoor Air Criteria and Laboratory Analyses** – The LTCP describes conditions where direct contact with contaminated soil or inhalation of contaminants volatilized to outdoor air poses a low threat to human health. According to the policy, the media-specific criteria for direct contact and outdoor air exposure shall be considered low-threat if the maximum concentrations of petroleum constituents in soil are less than or equal to those listed in the LTCP's Table 1 for the specified depth bgs.
 - a.** Our review of Table 3A, Cumulative Soil Analytical Results in the Work Plan indicates that insufficient data collection and analysis has been presented to satisfy the media-specific criteria for direct contact and outdoor air exposure. Please collect and analyze soil samples from the five and ten foot intervals, and, as mentioned, the groundwater interface, lithologic changes, and areas of obvious impact. Also please analyze soil and groundwater samples for naphthalene and, as mentioned, polycyclic aromatic hydrocarbons (PAH) by appropriate analytical methods.

- b. Additionally, although it is stated in the Work Plan that the secondary source has been removed to the extent practicable due to the site's long remedial history, in the updated SCM, please indicate in Tables 3A and 3B, *Cumulative Soil Analytical Results*, analytical results of soil that have been removed from the site by graying out the data or other visual means.

3. Updating the Sensitive Receptor Survey (SRS) to confirm the sensitive receptors:

- a. Please use records from both the Alameda County Public Works Agency (ACPWA) and California Department of Water Resources because information from these two sources is sufficiently different to warrant inclusion of both in the SRS;
- b. Sporadic appearance of non-aqueous phase liquid (NAPL): ACEH is concerned that due to the sporadic appearance of NAPL in groundwater samples from MW-1 (decommissioned), MW-3, and CPT2, NAPL may traveling via utility corridors to the estuary approximately 1,900 feet southwest of the site. Please provide rationale supporting the source of the intermittent NAPL and please indicate the location of the storm drain outfall(s) to the estuary on a site vicinity aerial photograph (such as Plate 4).

TECHNICAL REPORT REQUEST

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

- **February 28, 2014** – Updated SCM and Soil and Groundwater Investigation and Groundwater Monitoring Report
File to be named: RO491_SCM_SWI_GWM_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/index.htm>

If you have any questions, please send me an electronic mail message at karel.detterman@acgov.org or call me at (510) 567-6708.

Sincerely,

Karel Detterman, PG
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
Direct: 510.567.6708
Fax: 510.337.9335
Email: karel.detterman@acgov.org

PDF copies of case files can be downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>

From: Detterman, Karel, Env. Health
Sent: Friday, November 22, 2013 12:23 PM

To: 'jennifer.c.sedlachek@exxonmobile.com'; 'mashpetroleum@yahoo.com'
Cc: 'rebekah.westrup@cardno.com'; 'david.daniels@cardno.com'; Roe, Dilan, Env. Health; 'Mansour Sepehr'
Subject: Fuel Leak Case No. RO491 and GeoTracker Global ID T0600100552, EXXON #7-3006, 720 High Street, Oakland, CA 94601

Hello Ms. Sedlachek and Mr. Mashoon:

I have been assigned as the new case worker for this site because Barb Jakub has transferred out of the LOP program.

Thank you for submitting the *Site Conceptual Model Update and Data Gap Investigation Work Plan* dated 9/27/2013 prepared on your behalf by Cardno ERI. ACEH conceptually approves of the proposed scope of work, but first requests a conference call to discuss the Site Conceptual Model and possible alternative methods for defining the off-site groundwater contaminant plume. Please let me know your choice of date and time from the following dates:

Monday 12/2 anytime before 3 PM
Friday 12/13 anytime before 3 PM
Monday 12/16 anytime before 3 PM
Tuesday 12/17 anytime before 3 PM
Thursday 12/19 anytime before 3 PM
Friday 12/20 anytime before 3 PM

Thank you,

Karel Detterman, PG
Hazardous Materials Specialist
Alameda County Environmental Health
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