

From: [Detterman, Karel, Env. Health](#)
To: [Greg Gurr](#); "[David R. Daniels](#)"; mashpetroleum@yahoo.com; "[Mansour Sepehr](#)"
Cc: "[Sedlachek, Jennifer C](#)"; [Roe, Dilan, Env. Health](#)
Subject: Fuel Leak Case No. RO491 and GeoTracker Global ID T0600100552, EXXON #7-3006, 720 High Street, Oakland, CA 94601
Date: Thursday, September 25, 2014 2:39:25 PM
Attachments: [Attachment 1 and ftpUploadInstructions 2014-05-15.pdf](#)

Hello Everyone:

Thank you for attending the conference call-meeting at our office on Friday 9/19/2014. The purpose of was to discuss the results of the *Updated Site Conceptual Model (SCM) and Soil and Groundwater Investigation and Groundwater Monitoring Report* (Report) dated 7/13/2014 in conjunction with Alameda County Environmental Health's (ACEH) Low Threat Closure Policy (LTCP) Evaluation and identify remaining data gaps on the path to closure. As discussed in the conference call-meeting, three data gaps were identified, as listed below under Technical Comments.

Please submit a Data Gap Work Plan to address the first Technical Comment; to expedite review, please e-mail the draft Data Gap Work Plan to my attention by 10/15/2014. I will send comments so that the Work Plan can be finalized and uploaded per the schedule in the Technical Report Request section. In the Soil and Groundwater Investigation, include responses to Technical Comments 2 and 3 and submit the report as a Request for Closure (RFC).

TECHNICAL COMMENTS

- 1. LTCP Media Specific Criteria for Direct Contact and Outdoor Air Criteria:** Soil and ground water has not been delineated for volatile organic compounds (VOCs) and polynuclear aromatic hydrocarbon (PAHs) between 0 to 5 feet and 5 to 10 feet below ground surface adjacent to the former waste oil underground storage tank (UST). To close this data gap, please prepare a Data Gap Investigation Work Plan to characterize the vertical extent (0 to 5 and 5 to 10-foot intervals) for volatile organic compounds (VOCs) or polynuclear aromatic hydrocarbon (PAHs) in soil and groundwater by advancing a soil boring adjacent to the former waste oil UST location. Additionally, ACEH requests collection and analysis of appropriate soil samples from the capillary fringe, saturated zone, stained interval(s), areas with high PID readings, and the bottom of the soil boring. If visual indications are not encountered, please collect soil samples at or just above the soil – water interface and the bottom of the boring.
- 2. LTCP Media Specific Criteria for Groundwater:** Please use the criteria listed in Table 1 of the LTCP's *Technical Justification for Groundwater Media-Specific Criteria* to define the length of the plume. The LTCP defines the length of the plume as the maximum extent from the point of release of any petroleum related constituent (GRO) in groundwater that exceeds the water quality objectives. Please prepare a figure plotting the estimated GRO plume length(s) in the groundwater gradient direction on an aerial photograph base map, identifying sensitive receptors within 1,000 feet of the edge of the plume.
- 3. Groundwater Monitoring Event:** Please present the results of the groundwater monitoring and sampling event conducted after June 2014, and which includes new wells MW-20 and MW-21.

Technical report request

- **October 15, 2014** – E-mailed Draft Data Gap Work Plan to karel.detterman@acgov.org

Please upload the technical report to the ACEH 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:

- **October 29, 2014** – Data Gap Work Plan
File to be named: RO491_WP_R_YYYY-MM-DD
- **Sixty days After Work Plan Approval** - Request for Closure
File to be named: RO491_RFC_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.

Thank you,

Karel Detterman, PG
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PDF copies of case files can be downloaded at:

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