

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



out  
9-06-06

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

September 5, 2006

Ms. Jennifer Sedlacheck  
Exxon Mobil  
4096 Piedmont, #194  
Oakland, CA 94611

BNY Western Trust Company  
C/o Ad Valorem Tax Dept.  
1 Valero Place  
San Antonio, TX 78212

Mr. Robert Ehlers  
Valero Energy Corporation  
685 West Third Street  
Hanford, CA 93230

Subject: Fuel Leak Case No. RO0002426, Former Exxon Station #7-3567, 3192 Santa Rita Road, Pleasanton, CA

Dear Ms. Sedlacheck and Mr. Ehlers:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the documents entitled, "Site Conceptual Model and Recommendation for Case Closure," dated July 10, 2006 but received by ACEH on August 15, 2006 and "Groundwater Monitoring Report, Second Quarter 2006," dated August 4, 2006. The Site Conceptual Model (SCM) summarizes existing information for the site and recommends case closure. The site is located within the Livermore-Amador Groundwater Basin approximately 425 feet north of several municipal water supply wells. The potential for discharges from the site to affect the water supply wells is a major concern. The concentrations of MTBE, TBA, and TPHd detected in groundwater at the site exceed drinking water toxicity criteria. The lower sand and gravel unit encountered at the site has significantly lower water levels than the overlying fine-grained unit, possibly reflecting the effects of pumping within the sand and gravel unit. Although the SCM indicates that groundwater concentrations are decreasing, review of the concentration graphs indicates that concentrations have decreased within the past year in several wells, but long-term trends over the past seven years appear to be stable or upward. Based on the potential for the site to affect municipal supply wells and the issues identified in our technical comments below, the case cannot be closed at this time.

This decision is subject to appeal to the State Water Resources Control Board (SWRCB), pursuant to Section 25299.39(b) of the Health and Safety Code (Thompson-Richter Underground Storage Tank Reform Act - Senate Bill 562). Please contact the SWRCB Underground Storage Tank Program at (916) 341-5851 for information regarding the appeal process.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

#### **TECHNICAL COMMENTS**

- 1. Trends in Dissolved Phase Concentrations.** The SCM indicates that dissolved-phase concentrations of TPHd, TPHg, BTEX, and MTBE show declining or stable trends at concentrations near the reporting limits, except for well MW-5, which shows fluctuating concentrations. Although dissolved phase concentrations have decreased in several wells over the last five monitoring events, the long-term trends may still be upward in several wells. As an example, the concentration of MTBE detected in groundwater from well MW-1 has decreased from 2,600 micrograms per liter ( $\mu\text{g/L}$ ) in March 2005 to 4.6  $\mu\text{g/L}$  in May 2006. However, the trend in MTBE concentrations in well MW-1 is upward over the approximately seven-year period from November 1998 to March 2005. Therefore, the long-term trend continues to be upward. The detection of 2,600  $\mu\text{g/L}$  of MTBE in March 2005 was the maximum MTBE concentration detected since monitoring began at the site in November 1998. TBA concentrations in well MW-1 have increased from less than 10  $\mu\text{g/L}$  in March 2003 to 114  $\mu\text{g/L}$  in December 2005. MTBE concentrations detected recently in well MW-4 are higher than MTBE concentrations detected during the period from 2001 to 2004. Based on these results, the degree to which natural attenuation is reducing dissolved-phase concentrations at the site is not clear.
- 2. TPH Source in Tank Pit Area.** The SCM concludes that a release most likely occurred from the old USTs prior to 1998 and a second release occurred from the dispensers, product piping, or new USTs between 1988 and 1998. The only soil samples collected in the area of the USTs were the tank pit soil samples collected from the old tank pit in 1988. No soil samples appear to have been collected in the area of the USTs installed in 1988. Due to the potential for a TPH source to exist in soil in the area of the UST tank pit, we request that you collect soil samples in the area of the new tank pit. We also request that you collect water samples from the tank pit wells to assess whether a significant release has occurred to shallow groundwater within the area of the tank pit. Please present plans to conduct this sampling in the Work Plan requested below.
- 3. Potential Leaks from Dispensers.** In August 2002, MTBE was detected in soil at concentrations exceeding Environmental Screening Levels (ESLs) for groundwater protection at locations beneath the dispensers and product piping. No groundwater samples have been collected in the dispenser area or downgradient (east southeast) of the dispenser area, based on the hydraulic gradient for the upper water-bearing zone shown on Plate 3. Please present plans to collect groundwater samples to assess whether dissolved phase hydrocarbons are migrating from the dispenser area.
- 4. Hydraulic Gradient.** Plate 4 (Groundwater Elevation Map, Lower Water-Bearing Zone) of the SCM and the Groundwater Monitoring Report, Second Quarter 2006, depicts a hydraulic gradient to the north for the lower zone. We do not believe Plate 4 accurately represents the hydraulic gradient within the lower zone. Well MW-7 is screened entirely within the upper fine-grained soils at the site and water levels from this well should not be included on Plate 4.

If water levels from well MW-8, which is screened entirely within the lower sand and gravel unit, are used for contouring instead of water levels from MW-7, the hydraulic gradient in the lower zone is generally to the south, towards the water supply wells. Please correct future Groundwater Elevation Maps in the reports requested below.

5. **Risk Assessment.** The risk assessment evaluated exposure pathways for direct dermal contact and ingestion of soil, volatilization from soil and transport into indoor air, and volatilization from groundwater and transport into indoor air. The baseline carcinogenic risk, expressed as an Individual Excess Lifetime Cancer Risk and baseline toxicity effects expressed as a hazard index, do not exceed target risk values for these pathways. The risk assessment does not consider the most significant exposure pathway for the site, groundwater ingestion. Please include the groundwater ingestion pathway in any future risk assessments that review cumulative risk.
6. **Well Location Maps.** The Regional Area Map (Plate 12) and Zone 7 Water Agency Well Location Map are not legible in the electronic document submitted. Please improve the quality of these maps within the electronic document or submit separate paper color copies of these documents. Please submit the revised Well Locations Maps in the Work Plan requested below.
7. **Quarterly Groundwater Monitoring.** We request that quarterly groundwater monitoring be continued at the site. Please continue to analyze the groundwater samples for TPHd, TPHg, BTEX, and fuel oxygenates and present the results in the groundwater monitoring reports requested below.

#### **TECHNICAL REPORT REQUEST**

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **November 15, 2006** – Quarterly Monitoring Report for the Third Quarter 2006
- **November 20, 2006** – Work Plan
- **February 15, 2007** – Quarterly Monitoring Report for the Fourth Quarter 2006

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**

Effective January 31, 2006, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) 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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

#### PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." 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 6735, 6835, and 7835.1) 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 registered 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 fuel leak case meet this requirement.

#### UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later 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

Jennifer Sedlacheck  
BNY Western Trust Company  
Robert Ehlers  
September 5, 2006  
Page 5

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.

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham  
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Paula Sime  
Environmental Resolutions, Inc.  
601 North McDowell Boulevard  
Petaluma, CA 94954

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT  
03-10-06

ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

March 9, 2006

Ms. Jennifer Sedlacheck  
Exxon Mobil  
4096 Piedmont, #194  
Oakland, CA 94611

Mr. Joseph Aldridge  
Valero Energy Corporation  
685 West Third Street  
Hanford, CA 93230

Subject: Fuel Leak Case No. RO0002426, Former Exxon Station #7-3567, 3192 Santa Rita Road, Pleasanton, CA – Report Submittal to Alameda County FTP Site

Dear Ms. Sedlacheck:

You recently submitted a hard copy of a report for the above-referenced site entitled, "Groundwater Monitoring Report, Fourth Quarter 2005, Former Exxon Service Station 7-3567, 3192 Santa Rita Road, Pleasanton, California." The report was dated February 13, 2006 and was received by Alameda County Environmental Health (ACEH) on March 3, 2006. Please note that effective January 31, 2006, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Hard copies of reports are no longer accepted. Therefore, please upload the "Groundwater Monitoring Report, Fourth Quarter 2005," and all future reports to the Alameda County FTP site as outlined in the following discussion of "Electronic Submittal of Reports," and the enclosed, "Electronic Report Upload (ftp) Instructions."

ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) 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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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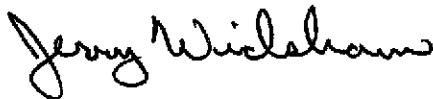
Ms. Jennifer Sedlacheck  
Mr. Joseph Aldridge  
March 9, 2006  
Page 2

Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org).

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham  
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Paula Sime  
Environmental Resolutions, Inc.  
601 North McDowell Boulevard  
Petaluma, CA 94954

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



10-30-02

October 29, 2002

RO 2426

Mr. Gene Ortega  
ExxonMobil Refining & Supply Company  
2300 Clayton Road, Ste. 1250  
Concord, CA 94520

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

RE: Exxon Station #7-3567 (Valero Station #3827), 3192 Santa Rita Road, Pleasanton - Request for Total Fuel Oxygenate Analyses and Clarification of Fee Title Owners

Dear Mr. Ortega:

The case file for the referenced site was recently reviewed, up to and including the September 2002 Horizon Environmental Inc. soil sampling report. This review was primarily conducted to identify the current suite of target compounds sought in water samples collected from the various wells within the network. Our review revealed that a number of potential fuel oxygenates may not have been sought historically from samples collected from these wells.

Please direct your consultant to analyze all samples collected during the next scheduled sampling event for the presence of total fuel oxygenates (MtBE, TAME, EtBE, DIPE, and TBA) and lead scavengers (EDB and 1,2-DCA / EDC) using EPA Method 8260. Such expanded analyses may be required to continue depending upon what is found.

In addition, please provide to this agency within 20 calendar days a complete mailing list of all fee title owners to the site, as well as the name and address of the current underground storage tank operator. We would also find it extremely helpful if a thorough explanation of the relationship between Valero Companies, Inc., Ultramar, Inc., and ExxonMobil, and any others if applicable to this case, would be provided.

Please contact me at (510) 567-6783 should you have any questions.

Sincerely,

Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB  
Danielle Stefani, Livermore-Pleasanton Fire Department  
Joe Aldridge, Valero Companies, Inc., 685 West Third St., Hanford, CA 93230  
Scott Graham, Env. Resolutions, Inc., 73 Digital Dr., Ste. 100, Novato, CA 94949-5791



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



01-26-01

R02426

January 25, 2001

STID 1932

Mr. Darin Rouse  
Exxon Company, U.S.A.  
P.O. Box 4032  
Concord, CA 94524-4032

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

RE: Exxon Service Station #7-3567, 3192 Santa Rita Road, Pleasanton

Dear Mr. Rouse:

We are in receipt of the January 16, 2001 Environmental Resolutions, Inc. (ERI) workplan proposing the installation of a single well (MW-8) at the south end of the subject site. Well MW-8 is intended to monitor the deeper gravelly sand zone that is expected to be encountered at depths of approximately 50' below grade. This workplan was submitted under Exxon cover dated January 18, 2001.

The cited ERI workplan has been accepted with the following change:

- Sampling of the completed well shall not occur any less than 24, and preferably 72, hours following well development

Please contact me at (510) 567-6783 when field work has been scheduled.

Sincerely,

Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Steve Cusenza, Pleasanton Public Works Department  
Chuck Headlee, RWQCB  
Matt Katen, Zone 7  
Danielle Stefani, Livermore-Pleasanton Fire Department  
Jim Chappell, Environmental Resolutions, Inc.  
73 Digital Drive, Ste. 100, Novato, CA 94949-5791

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



(Exxon) R02886 (31929.870)

✓ R02426 (31929.870)

R0953 (1175  
Catalina)

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(415)

September 5, 1991

Mr. Rick Mueller  
Fire Station 1  
City of Pleasanton  
4444 Railroad Avenue  
Pleasanton, CA 94566

RE: SEPTEMBER EXXON COMPLIANCE MEETING; SS# 7-0222 AND 7-3567, 1175  
CATALINA DRIVE, LIVERMORE, AND 3192 SANTA RITA ROAD, PLEASANTON

Dear Mr. Mueller:

The next Exxon compliance meeting is scheduled for Tuesday, September 24, 1991. During this meeting the compliance status of the two referenced Exxon facilities will be discussed, one of which, station #7-3567, is within your jurisdiction. The meeting will convene promptly at 9:00 AM and be held at the Alameda County Environmental Health Department office, located at 80 Swan Way, Room 200, Oakland.

Please call either myself or Mr. Ariu Levi, Supervising Hazardous Materials Specialist, at 415/271-4320 should this schedule prove inconvenient.

Sincerely,

  
Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health  
Edgar Howell, Chief, Hazardous Materials Division  
Ariu Levi, Supervising Hazardous Materials Specialist  
Gil Jensen, Alameda County District Attorney's Office  
Lester Feldman, RWQCB  
William Wang, Exxon Corp.