

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT  
9-26-06

September 25, 2006

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

Mr. Ken Phares  
MacArthur Blvd. Associates  
10700 MacArthur Blvd.  
Oakland, CA 94605

ENVIRONMENTAL HEALTH SERVICES

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

Dear Ms. Sadlachek and Mr. Phares:

Subject: Fuel Leak Case RO0002635, Exxon #7-4121, 10605 Foothill Blvd.,  
Oakland, CA 94605

Alameda County Environmental Health staff has received and reviewed the July 2006, Subsurface Investigation and Risk Assessment Report, prepared by ETIC Engineering. This report provides the results of soil, groundwater and soil vapor sampling collected at the site and also provides results of a conduit/receptor survey, well search and human health risk assessment. We have the following technical comments and request you submit the technical report requested below.

#### TECHNICAL COMMENTS

1. Well Search- Based upon the results of the well survey presented it appears that only one of the five wells identified would be down-gradient of this site. Because this well is approximately 1640 feet from the site, our office concurs that it is not likely being impacted by the release from this site.
2. Conduit/Receptor Survey- Based upon the information on the anticipated depth to electric and gas lines, storm and sanitary sewer lines and water lines and the general depth to groundwater at this site, these utilities would not be expected to be encountered by the fuel release.
3. Contaminant Source Characterization- Soil contamination appears to be limited to the immediate vicinity of the former UST pit and vary in depths from 10-20' bgs. Groundwater contamination appears more widespread. It is found within and down-gradient of the former tank pit and also near the former dispenser islands. The recent groundwater samples detected up to 60,600 ppb TPHg, 26,000 ppb TPHd, and 3240, 1400, 4690, 11,100 ppb, BTEX, respectively and represent a continual source of groundwater contamination. These results indicate an undefined plume, which has likely migrated off-site beneath adjacent properties. MTBE was reported in only the samples along the 106<sup>th</sup> Ave. property boundary indicating either an off-site source impacting the site or plume migration from the site. Given the absence of MTBE in soil and groundwater samples on-site, the site is not likely a source of this contaminant. Off-site plume delineation appears necessary before the site closure can be considered. In addition, on site well installation will be required to monitor current groundwater concentrations and measure the affect of on-site remediation. We believe that

on-site remediation alternatives should be considered to reduce the residual groundwater petroleum source, regardless of current or future soil vapor results. Please provide a work plan as requested below.

4. Soil Vapor Sampling- Results from soil vapor samples in the vicinity and down-gradient of the former UST pit indicate elevated TPHg in gas samples collected from 5.5-10' bgs. The risk assessment performed using these soil vapor results indicates a carcinogenic health risk of 1.8-3E-6 for commercial and residential exposure, respectively and a non-carcinogenic hazard index of 53 and 38 for residential and commercial exposure, respectively. Additional soil vapor sampling is recommended since vapor sampling occurred at varying depths and at some locations samples were not able to be collected. We are not against taking additional soil vapor samples, however, as stated, we recommend remedial alternatives be considered for the former UST pit, at a minimum, in addition to additional sampling.

#### TECHNICAL REPORT REQUEST

Please submit the following technical reports to our office according to the following schedule:

- October 30, 2006- Work plan for well installation, plume delineation, and feasibility study of remedial alternatives.

This report is being requested pursuant to California Health and Safety Code Section 25296.10. Title 23, CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from petroleum UST system, and require your compliance with this request.

#### ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. 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. 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 monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board, ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)) for more information on these requirements.

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

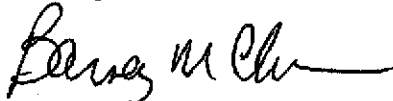
The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For 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.

If you have any questions, please contact me at (510) 567-6765.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

C: files, D. Drogos  
Ms. Sherris Prall, ETIC Engineering, 2285 Morello Ave., Pleasant Hill, CA 94523

ALAMEDA COUNTY  
HEALTH CARE SERVICES



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AGENCY  
DAVID J. KEARS, Agency Director

July 27, 2005

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

Mr. Ken Phares  
MacArthur Blvd. Associates  
10700 MacArthur Blvd.  
Oakland, CA 94605

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1131 Harbor Bay Parkway, Suite 250  
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(510) 567-6700  
FAX (510) 337-9335

Dear Ms. Sadlachek and Mr. Phares:

Subject: Fuel Leak Case RO0002635, Exxon #7-4121, 10605 Foothill Blvd.,  
Oakland, CA 94605

Alameda County Environmental Health staff has received and reviewed the July 15, 2005 *Subsurface Investigation Report*, prepared by ETIC Engineering. This report details the results of soil and groundwater sampling from nine (9) borings advanced at the site in an attempt to determine the lateral and vertical extent of petroleum contamination from the former UST system. A previous investigation had detected soil and groundwater contamination in the vicinity of the former USTs, although the exact location of the UST system appears uncertain. We request that you address the following technical comments and submit the technical report requested below.

TECHNICAL COMMENTS

1. Conduit/Receptor Survey Study

The purpose of the conduit study is to locate potential migration pathways and potential conduits and determine the probability of the plume encountering preferential pathways and conduits that could spread the contamination. The conduit study shall include a detailed well survey of all wells (monitoring and production wells: active, inactive, standby, destroyed (sealed with concrete), abandoned (improperly destroyed); and dewatering, drainage, and cathodic protection wells) within a ½ mile radius of the subject site. As part of your detailed well survey, please perform a background study of the historical land uses of the site and properties in the vicinity of the site. Use the results of your background study to determine the existence of unrecorded/unknown (abandoned) wells, such as agricultural and domestic wells, that can act as pathways for migration of contamination at and/or from your site. Please review historical maps such as Sanborn maps, aerial photos, etc., when performing the background study. Provide a map(s) showing the location of all wells identified in your study. Please also provide copies of Sanborn maps indicating the presence of "gas and oil".

2. Characterization of Local Hydrogeology and Groundwater Flow Conditions

The purpose of this characterization is to understand the physical and geochemical characteristics of the subsurface, which may affect groundwater flow, the breakdown (fate),

migration (transport), and the distribution of contaminants through the subsurface. Additionally, factors such as water level fluctuations, gradient changes, local hydrogeology, groundwater extraction, and groundwater recharge activities (natural and artificial) can significantly alter groundwater flow conditions. We request that you properly characterize the hydrogeology and groundwater flow conditions in the vicinity of your site. We require that you prepare detailed cross-sections and determine the gradient for the site. Include soil concentrations and groundwater iso-concentration contours on your cross-section.

### 3. Contaminant Source Characterization

The purpose of contaminant source characterization is to determine the nature and extent of free product (liquid phase), petroleum saturated soils (residual phase), and hydrocarbons dissolved in groundwater (aqueous phase), and high concentrations of soil vapor (vapor phase) that will continue to increase the concentration and mass of the dissolved phase contaminant plume. Contaminant source characterization also includes characterization of dissolved phase contamination and an estimation of contaminant mass in the source area. We are concerned that soil contamination has not been adequately defined within the vicinity of the former USTs, which could leave a significant residual source of contamination. The lack of vertical delineation in SB-1 and the presence of elevated TPH in groundwater in SB-2 is of concern. In addition, the plume requires delineation towards the residence to the west and north towards 106<sup>th</sup> Ave. After completion of this characterization, an evaluation as to the need for permanent monitoring wells must be made.

### 4. Soil Vapor Sampling

We concur that soil vapor sampling would be useful to determine if vapor risk exists from residual contamination, however, it would be most appropriately done when site characterization is complete. Sampling in known areas of contamination and near receptors would typically be recommended.

## TECHNICAL REPORT REQUEST

Please submit the following technical reports to our office according to the following schedule:

- August 29, 2005- Conduit/Receptor Survey study, hydrogeology characterization and work plan to further delineate soil and groundwater contamination.
- 30 days after the submittal of your soil and groundwater investigation report- Soil vapor sampling work plan

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. Title 23, CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from petroleum UST system, and require your compliance with this request.

Ms. Sadlachek & Mr. Phares  
RO0002635  
July 27, 2005  
Page 3 of 3

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.

If you have any questions, please contact me at (510) 567-6765.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

C: files, D. Drogos

Ms. Sherris Prall, ETIC Engineering, 2285 Morello Ave., Pleasant Hill, CA 94523

7\_26\_05 10605 Foothill Blvd



scwt  
05-20-05

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway  
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Fax (510) 337-9335

May 19, 2005

Jennifer C. Sadlachek  
Exxonmobil  
4096 Piedmont Ave., # 194  
Oakland, CA 94611

Ken Phares  
MacArthur Blvd Associates  
10700 MacArthur Blvd.  
Oakland, Ca 94605

**Re: Fuel Leak Investigation, Site No. RO0002635, EXXON #7-4121, 10605 Foothill Blvd., Oakland, CA 94605**

Dear Ms. Sadlachek and Mr. Phares:

Alameda County Environmental Health, Local Oversight Program (LOP), has received and reviewed the April 19, 2005 document and its addendum dated May 19<sup>th</sup>, 2005 regarding the above referenced site as prepared by Ms. Sherris Prall of ETIC Engineering, (ETIC). Additionally I have discussed the above referenced case with several individuals including Ms. Prall of ETIC.

This office requests that you address the following technical comments, perform the proposed work, and send us the technical reports requested below:

**TECHNICAL COMMENTS**

This work plan addresses the required investigations in my correspondence dated March 22<sup>nd</sup>, 2005 including further definition of both the horizontal and vertical extent of groundwater contamination. However, we had also requested copies of any other reports pertaining to any USTs systems that are/were present at this site and/or environmental contamination related reports.

This office concurs with the submitted workplan as amended specified above.

**TECHNICAL REPORT REQUEST**

Please submit the following technical reports to Alameda County Department of Environmental Health (Attention: Amir K. Gholami):

- July 19, 2004**      Result of the Work Plan
- July 19, 2004**      Copies of any other reports pertaining to any USTs systems

If you have any questions, please do not hesitate to call me at (510) 567-6876

Sincerely,



Amir K. Gholami

Hazardous Materials Specialist

C: Ms. Sherris Prall, ETIC Engineering, 2285 Morello Ave., Pleasant Hill, CA 94523  
A.gholami, D.Drogos



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT  
03-23-05

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1131 Harbor Bay Parkway  
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March 22, 2005

Jennifer C. Sadlachek  
Exxonmobil  
4096 Piedmont Ave., # 194  
Oakland, CA 94611

Ken Phares  
MacArthur Blvd Associates  
10700 MacArthur Blvd.  
Oakland, Ca 94605

**Re: Fuel Leak Investigation, Site No. RO0002635, EXXON #7-4121, 10605 Foothill Blvd., Oakland, CA 94605**

Dear Ms. Sadlachek and Mr. Phares:

Alameda County Environmental Health (ACEH) staff reviewed a report dated April 7, 2004 indicating a release from your former gasoline underground storage tank (UST) system removed from your property prior to December 1998. This office subsequently listed the subject site on our database of fuel leak sites. Our office acts as the lead agency to oversee the investigation and cleanup of petroleum hydrocarbon releases.

**TECHNICAL COMMENTS**

We have recently reviewed the information in our file and determined that up to 1,000 ppm TPHG, 590 ppm TPHD, and 0.55 ppm Benzene were detected in soil. Up to 7,000 ppb TPHG, 26,000 ppb TPHD, 250 ppb Benzene, and up to 17 ppb MTBE were detected in groundwater. Per our meeting this afternoon a soil and groundwater investigation is necessary at this site to progress toward case closure.

Please define the extent of soil and groundwater at your site. This type of investigation usually involves drilling soil borings and collecting soil and groundwater samples for chemical analyses. Groundwater monitoring wells may be needed and groundwater sampled to properly characterize groundwater contamination. Other options for additional investigation may be appropriate to define contamination at your site.

Please submit a work plan detailing your proposal to define the extent of soil and groundwater contamination by **April 22, 2005**.

The case file for the subject site contains one report "phase II site investigation", dated April 7, 2004, prepared by AEI Consultants. We request that you submit copies of any other reports pertaining to any USTs systems that are/were present at this site and/or environmental contamination related reports by **April 22, 2005**.

## TECHNICAL REPORT REQUEST

Please submit the following technical reports to Alameda County Department of Environmental Health (Attention: Amir K. Gholami):

**April 22, 2005** Work Plan

**April 22, 2005** Copies of any other reports pertaining to any USTs systems that are/were present at this site and/or environmental contamination related reports

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.

## 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.

## 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.

## LANDOWNER NOTIFICATION REQUIREMENTS

Pursuant to California Health & Safety Code Section 25297.15, the active or primary responsible party for a fuel leak case must inform all current property owners of the site of cleanup actions or requests for closure. Furthermore, ACEH may not consider any cleanup proposals or requests for case closure without assurance that this notification requirement has been met. Additionally, the active or primary responsible party is required to forward to ACEH a complete mailing list of all record fee title holders to the site.

At this time we require that you submit a complete mailing list of all record fee title owners of the site by **April 22, 2005**, which states, at a minimum, the following:

*A. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (name of primary responsible party), certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site:*

*- OR -*

*B. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (name of primary responsible party), certify that I am the sole landowner for the above site.*

(Note: Complete item A if there are multiple site landowners. If you are the sole site landowner, skip item A and complete item B.)

## PROFESSIONAL CERTIFICATION


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.

## 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 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 do not hesitate to call me at 510-567-6876.

Sincerely,



Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Peter McIntyre, AEI Consultants, 2500 Camino Diablo, Suite  
200, Walnut Creek, CA 94597 Tremont Road, Dixon, CA 95620  
D. Drogos, A. Gholami