

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



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

November 6, 2008

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

Mr. Ted Dang
Fourteenth and Madison Associates
1305 Franklin St.
Oakland, CA 94612

Madison Street Lofts
1250 Addison Street, Suite G
Berkeley, CA 94702

Mr. Liang Lee
388 Market St., FL 5
San Francisco, CA 94111

Subject: Fuel Leak Case No. RO0002922 and Geotracker Global ID T06019782296, Mobil #10-MHG, 160 14th St., Oakland, CA 94612

Dear Ms. Sedlachek, Etal:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the most recent document entitled, *Letter Report – Groundwater Sampling* dated April 12, 2006 and prepared by ACC Environmental Consultants. This letter indicates that total petroleum hydrocarbons as gasoline (TPHg) and benzene were detected in groundwater samples collected adjacent to the former gasoline tank locations at maximum concentrations of 18,000 micrograms per liter ($\mu\text{g/L}$) and 690 $\mu\text{g/L}$, respectively. Also 820 $\mu\text{g/L}$ tetrachloroethene (PCE), 42 $\mu\text{g/L}$ trichloroethene (TCE), 16 $\mu\text{g/L}$ cis-1,2-Dichloroethene (cis-1,2-DCE) and 8.7 $\mu\text{g/L}$ vinyl chloride were detected in water samples collected at the site. The 2006 report indicates that site dewatering and excavation were possibly going to be implemented at the site. To date, ACEH has not received information on if these events took place and if residual concentrations remain at this site. We understand that the site is being redeveloped as residential and have additional concerns that we would like you to address. ACEH requests that you perform the work requested below, address the following technical comments, and submit the report requested below.

TECHNICAL COMMENTS

1. **Dissolved Contamination Plume Definition** – Data collected in the investigations performed at the site indicate that 18,000 $\mu\text{g/L}$ TPHg, 690 $\mu\text{g/L}$ benzene, 820 $\mu\text{g/L}$ PCE, 42 $\mu\text{g/L}$ TCE, 16 $\mu\text{g/L}$ cis-1,2-DCE and 8.7 $\mu\text{g/L}$ vinyl chloride were detected in groundwater samples collected at the site. Information presented in the April 14, 2006 letter report states that development of the property may include further excavation and dewatering. ACC states that excavation will remove “much of the source of petroleum hydrocarbon impact” and site dewatering would serve to remediate impacted groundwater. ACEH requests that samples be obtained to test this hypothesis. Please submit your proposal to evaluate current contaminant concentrations in groundwater in the work plan requested below. In addition,

the extent of the groundwater plume is not completely defined. Groundwater flow direction has not been determined. No wells have been placed on-site and no mention of groundwater flow direction has been reported. Water samples have been collected in only 5 locations across the site and areas in the expected downgradient direction have not been investigated. Please submit your proposal to investigate the extent of groundwater contamination in the work plan requested below.

2. **Soil Vapor Sampling** – The current assessor's records indicate that the property will be used for residential use. Given that groundwater and/or soil concentrations exceed the respective environmental screening level for TPHg, benzene, PCE, and vinyl chloride and residential development is expected over the site, ACEH requests that you evaluate the vapor intrusion pathway by performing soil vapor sampling above the locations of the maximum detected contaminant concentrations. Please submit your proposal in the work plan requested below.
3. **Source Area Characterization** – The maximum benzene concentration detected in soil was 1.0 mg/Kg. The sample was collected near the former tank from a depth of eight feet below ground surface. No soil samples were collected below this depth and no samples were collected from the other soil borings. Neither the lateral or vertical extent of contamination has been assessed in soil. Please submit a proposal to assess the source area adjacent to the USTs and to define the lateral and vertical extent of soil contamination in the work plan requested below.
4. **EDB and EDC Analysis.** Neither EDB nor EDC have been analyzed at this site. Please include these analytes for any planned soil or groundwater samples.
5. **Soil and Water Disposal** – As discussed above, the April 12, 2006 ACC report recommends that both soil and water be removed from the site. No soil or water disposal records have been provided to ACEH, nor have we been informed of whether additional excavation activities have occurred. Please provide a summary report indicating the areas excavated and if dewatering wells were installed. Please include copies of the manifests for any soil and water that was disposed from the site in the report requested below. Also, the analytical reports and other Appendices are missing from our copy of this report. Please upload a complete copy of this report to our ftp site as per the attached instructions.
6. **Geotracker Compliance** – Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. Also, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude to sub-meter accuracy using NAD 83. A California licensed surveyor may be required to perform this work. Additionally, pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3893, 3894, and 3895, beginning July 1, 2005, the successful submittal of electronic information (i.e. report in PDF format) shall replace the requirement for the submittal of a paper copy. Please claim your site and upload all future submittals to GeoTracker and ACEH's ftp server by the date specified below. Electronic reporting is described below.

REQUEST FOR INFORMATION

ACEH's case file for the subject site contains only the electronic reports as listed on our website (<http://www.acgov.org/aceh/lop/ust.htm>). You are requested to submit copies of all other reports related to environmental investigations for this property (including Phase 1 reports) by **December 1, 2008**.

TECHNICAL REPORT REQUEST

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

- **December 5, 2008** – Claim site in Geotracker
- **February 6, 2009** – Work Plan

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

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).

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 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) 639-1287 or send me an electronic mail message at barbara.jakub@acgov.org.

Sincerely,



Barbara Jakub, P.G.
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: David DeMent, ACC Environmental Consultants, 7977 Capwell Dr., Oakland, CA 94621
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA
94612-2032

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Donna Drogos, ACEH
Barbara Jakub, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY

Department Of Environmental Health
Environmental Protection Division
1131 Harbor Bay Parkway
Alameda, CA 94502-6577



RECEIVED
NOV 17 2008

R02922

ENVIRONMENTAL HEALTH SERVICES

Mr. Liang Lee
388 Market Street, Floor 5

San Francisco, CA 94111
NIXIE 941 DE 1 OO 11/12/08
RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD
BC: 94502654031 *1905-07177-07-39
945026540
541178375

| | |
|---|---|
| Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) | ISSUE DATE: July 5, 2005 |
| | REVISION DATE: December 16, 2005 |
| | PREVIOUS REVISIONS: October 31, 2005 |
| SECTION: Miscellaneous Administrative Topics & Procedures | SUBJECT: Electronic Report Upload (ftp) Instructions |

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.

REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements must be included and have either original or electronic signature.
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:
RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in Excel format. These are for use by assigned Caseworker only.

Submission Instructions

- 1) Obtain User Name and Password:
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to dehloptoxic@acgov.org
or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
 - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.**

- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.

- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload)