

ExxonMobil
Environmental Services Company
4096 Piedmont Avenue #194
Oakland, California 94611
510 547 8196 Telephone
510 547 8706 Facsimile

Jennifer C. Sedlachek
Project Manager

RECEIVED

By Alameda County Environmental Health at 9:51 am, Sep 09, 2014

ExxonMobil

September 5, 2014

Mr. Mark Detterman
Alameda County Health Care Services Agency
Department of Environmental Health
1131 Harbor Bay Parkway, Room 250
Alameda, California 94502-6577

RE: Former Exxon RAS #79374/990 San Pablo Avenue, Albany, California.

Dear Mr. Detterman:

Attached for your review and comment is a copy of the letter report entitled *Response to Comments and Request for Extension*, dated September 5, 2014, for the above-referenced site. The report was prepared by Cardno ERI of Petaluma, California, and responds to comments regarding the subject site.

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.

If you have any questions or comments, please contact me at 510.547.8196.

Sincerely,



Jennifer C. Sedlachek
Project Manager

Attachment: Cardno ERI's *Response to Comments and Request for Extension*, dated September 5, 2014

cc: w/ attachment
Ms. Muriel T. Blank, Trustee, The Blank Family Trust
Reverend Deborah Blank, Trustee, The Blank Family Trust
Ms. Marcia Blank Kelly, The Blank Family Trust

w/o attachment
Mr. Greg Gurss, Cardno ERI



Cardno ERI
License A/C10/C36-611383

601 North McDowell Blvd.
Petaluma, CA 94954

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www.cardno.com

www.cardnoeri.com

September 5, 2014
Cardno ERI 2735C.R06

Ms. Jennifer C. Sedlachek
ExxonMobil Environmental Services Company
4096 Piedmont Avenue #194
Oakland, California 94611

SUBJECT Response To Comments and Request For Extension
Former Exxon Service Station 79374
990 San Pablo Avenue, Albany, California

Alameda County Department of Environmental Health RO 2974

Ms. Sedlachek:

At the request of ExxonMobil Environmental Services (EMES), on behalf of Exxon Mobil Corporation, Cardno ERI prepared this response to comments and request for extension for the subject site. The purpose of this letter is to respond comments by the Alameda County Health Care Services Agency (County) in their correspondence dated July 7 and August 22, 2014 (Appendix A) and to request modifications to the deadlines established in the correspondence.

SOIL VAPOR SAMPLING REPORT

Prior to the County's July 7 and August 22, 2014 correspondence, an extension request to October 10, 2014 was granted for a previously due soil vapor sampling report in electronic correspondence dated June 5, 2014 (Appendix A). The soil vapor sampling report will contain data from the second soil vapor sampling event at the site. The first soil vapor sampling event was reported in the *Soil, Soil Vapor, and Groundwater Investigation Report and Site Conceptual Model* dated May 2, 2014 (Cardno ERI, 2014a). Cardno ERI intends to submit the report by the October 10, 2014 deadline.

Australia • Belgium • Canada • Colombia • Ecuador • Germany • Indonesia • Italy •
Kenya • New Zealand • Papua New Guinea • Peru • Philippines • Tanzania •
United Arab Emirates • United Kingdom • United States • Operations in 85 countries

WORK PLAN

The July 7, 2014 correspondence requested a data gap investigation work plan and foundation analysis by September 5, 2014. Prior to receiving the July 7, 2014 correspondence, Cardno ERI prepared the *Work Plan for Well Installation* (Work Plan) dated July 7, 2014 (Cardno ERI, 2014b). The Work Plan did not include the requested foundation analysis but was conditionally approved in correspondence dated August 22, 2014 (Appendix A). Cardno ERI has no objections to not using an air knife as requested by the County in the conditional approval. Cardno ERI proposes to include the previously-requested foundation analysis in the soil vapor sampling report due on October 10, 2014.

FEASIBILITY STUDY/CORRECTIVE ACTION PLAN

In the County's July 7 and August 22, 2014 correspondence, a draft feasibility study/corrective action plan (FS/CAP) was requested with a deadline of September 19, 2014. The July 7, 2014 correspondence also requested the addition of HVOCs to the sampling suite at the site, including for samples collected during groundwater monitoring. The next scheduled groundwater monitoring and sampling event will be conducted during the fourth quarter of 2014.

REQUEST FOR EXTENSION

Cardno ERI requests that the requested FS/CAP not be due until the completion of:

- The fourth quarter 2014 groundwater sampling event to allow for the collection of samples to be analyzed for HVOCs.
- The installation and sampling of the off-site wells proposed in the Work Plan to allow for the delineation of dissolved-phase concentrations.
- The collection of a second set of soil vapor samples to assess seasonal variations.

Cardno ERI believes preparing an FS/CAP prior to performing the currently pending assessment work is premature and will likely result in required changes to the FS/CAP requiring the production of additional addendums and reviews.

The site investigation report following the implementation of the Work Plan is currently due on November 15, 2014, and the fourth quarter 2014 groundwater sampling event is currently due on December 5, 2014. Cardno ERI believes a due date for the FS/CAP 60 days following the submission of these two reports is appropriate and proposes a due date of February 5, 2015.

September 5, 2014
Cardno ERI 2735C.R06 Former Exxon Service Station 79374, Albany, California

CONTACT INFORMATION

The responsible party contact is Ms. Jennifer C. Sedlachek, ExxonMobil Environmental Services Company, 4096 Piedmont Avenue #194, Oakland, California, 94611. The consultant contact is Mr. Greg A. Gurss, Cardno ERI, 601 North McDowell Boulevard, Petaluma, California, 94954. The agency contact is Mr. Mark Detterman, Alameda County Health Care Services Agency, Environmental Health Services, 1131 Harbor Bay Parkway, Suite 250, Alameda, California, 94502-6577.

LIMITATIONS

For documents cited that were not generated by Cardno, the data taken from those documents is used "as is" and is assumed to be accurate. Cardno does not guarantee the accuracy of this data and makes no warranties for the referenced work performed nor the inferences or conclusions stated in these documents.

This document and the work performed have been undertaken in good faith, with due diligence and with the expertise, experience, capability, and specialized knowledge necessary to perform the work in a good and workmanlike manner and within all accepted standards pertaining to providers of environmental services in California at the time of investigation. No soil engineering or geotechnical references are implied or should be inferred. The evaluation of the geologic conditions at the site for this investigation is made from a limited number of data points. Subsurface conditions may vary away from these data points.

Please contact Mr. Greg A. Gurss, Cardno's project manager for this site, at greg.gurss@cardno.com or at (916) 692-3130 with any questions or comments regarding this letter.

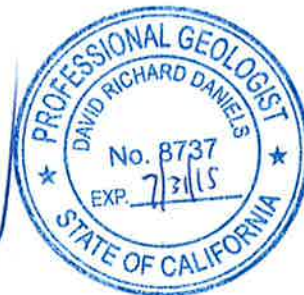
Sincerely,

*Used for
Scanned
Image*

Greg A. Gurss
Senior Project Manager
for Cardno
916 692 3130
Email: greg.gurss@cardno.com

*Scanned
Image*

David R. Daniels
P.G. 8737
for Cardno
707 766 2000
Email: david.daniels@cardno.com



September 5, 2014
Cardno ERI 2735C.R06 Former Exxon Service Station 79374, Albany, California

Enclosures:

References

Acronym List

Appendix A Correspondence

cc: Mr. Mark Detterman, Alameda County Health Care Services Agency, Environmental Health Services,
1131 Harbor Bay Parkway, Suite 250, Alameda, California, 94502-6577

Mr. Stephen Hill, Regional Water Quality Control Board, San Francisco Bay Region, 1515 Clay Street,
Suite 1400, Oakland, California, 94612

Ms. Muriel T. Blank, Trustee, The Blank Family Trusts, 1164 Solano Avenue, #406, Albany, California,
94706

Reverend Deborah Blank, Trustee, The Blank Family Trusts, 1563 Solano Avenue, #344, Berkeley,
California, 94707

Ms. Marcia Blank, Trustee, The Blank Family Trusts, 641 SW Morningside Road, Topeka, Kansas,
66606

September 5, 2014
Cardno ERI 2735C.R06 Former Exxon Service Station 79374, Albany, California

REFERENCES

Cardno ERI (Cardno). May 2, 2014a. *Soil, Soil Vapor, and Groundwater Investigation Report and Site Conceptual Model, Former Exxon Service Station 79374, 990 San Pablo Avenue, Albany, California, Alameda County #RO00002974.*

Cardno ERI (Cardno). July 7, 2014b. *Work Plan for Well Installation, Former Exxon Service Station 79374, 990 San Pablo Avenue, Albany, California, Alameda County #RO00002974.*

ACRONYM LIST

µg/L	Micrograms per liter	NEPA	National Environmental Policy Act
µs	Microsiemens	NGVD	National Geodetic Vertical Datum
1,2-DCA	1,2-dichloroethane	NPDES	National Pollutant Discharge Elimination System
acfm	Actual cubic feet per minute	O&M	Operations and Maintenance
AS	Air sparge	ORP	Oxidation-reduction potential
bgs	Below ground surface	OSHA	Occupational Safety and Health Administration
BTEX	Benzene, toluene, ethylbenzene, and total xylenes	OVA	Organic vapor analyzer
CEQA	California Environmental Quality Act	P&ID	Process & Instrumentation Diagram
cfm	Cubic feet per minute	PAH	Polycyclic aromatic hydrocarbon
COC	Chain of Custody	PCB	Polychlorinated biphenyl
CPT	Cone Penetration (Penetrometer) Test	PCE	Tetrachloroethene or perchloroethylene
DIPE	Di-isopropyl ether	PID	Photo-ionization detector
DO	Dissolved oxygen	PLC	Programmable logic control
DOT	Department of Transportation	POTW	Publicly owned treatment works
DPE	Dual-phase extraction	ppmv	Parts per million by volume
DTW	Depth to water	PQL	Practical quantitation limit
EDB	1,2-dibromoethane	psi	Pounds per square inch
EPA	Environmental Protection Agency	PVC	Polyvinyl chloride
ESL	Environmental screening level	QA/QC	Quality assurance/quality control
ETBE	Ethyl tertiary butyl ether	RBSL	Risk-based screening levels
FID	Flame-ionization detector	RCRA	Resource Conservation and Recovery Act
fpm	Feet per minute	RL	Reporting limit
GAC	Granular activated carbon	scfm	Standard cubic feet per minute
gpd	Gallons per day	SSTL	Site-specific target level
gpm	Gallons per minute	STLC	Soluble threshold limit concentration
GWPTS	Groundwater pump and treat system	SVE	Soil vapor extraction
HVOC	Halogenated volatile organic compound	SVOC	Semivolatile organic compound
J	Estimated value between MDL and PQL (RL)	TAME	Tertiary amyl methyl ether
LEL	Lower explosive limit	TBA	Tertiary butyl alcohol
LPC	Liquid-phase carbon	TCE	Trichloroethene
LRP	Liquid-ring pump	TOC	Top of well casing elevation; datum is msl
LUFT	Leaking underground fuel tank	TOG	Total oil and grease
LUST	Leaking underground storage tank	TPHd	Total petroleum hydrocarbons as diesel
MCL	Maximum contaminant level	TPHg	Total petroleum hydrocarbons as gasoline
MDL	Method detection limit	TPHmo	Total petroleum hydrocarbons as motor oil
mg/kg	Milligrams per kilogram	TPHs	Total petroleum hydrocarbons as stoddard solvent
mg/L	Milligrams per liter	TRPH	Total recoverable petroleum hydrocarbons
mg/m ³	Milligrams per cubic meter	UCL	Upper confidence level
MPE	Multi-phase extraction	USCS	Unified Soil Classification System
MRL	Method reporting limit	USGS	United States Geologic Survey
msl	Mean sea level	UST	Underground storage tank
MTBE	Methyl tertiary butyl ether	VCP	Voluntary Cleanup Program
MTCA	Model Toxics Control Act	VOC	Volatile organic compound
NAI	Natural attenuation indicators	VPC	Vapor-phase carbon
NAPL	Non-aqueous phase liquid		

APPENDIX A

CORRESPONDENCE

From: Detterman, Mark, Env. Health [<mailto:Mark.Detterman@acgov.org>]
Sent: Thursday, June 05, 2014 10:13 AM
To: Greg Gurss
Subject: RE: Former Exxon 79374 (RO2974) 990 San Pablo Avenue, Albany, CA

Greg,
Please use this email to document ACEH concurrence with the requested extension.

Mark Detterman
Senior Hazardous Materials Specialist, PG, CEG
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
Direct: 510.567.6876
Fax: 510.337.9335
Email: mark.detterman@acgov.org

PDF copies of case files can be downloaded at:

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

From: Greg Gurss [<mailto:greg.gurss@cardno.com>]
Sent: Tuesday, June 03, 2014 1:53 PM
To: Detterman, Mark, Env. Health
Subject: Former Exxon 79374 (RO2974) 990 San Pablo Avenue, Albany, CA
Importance: High

Mr. Detterman:

Alameda County Environmental Health (ACEH) issued a letter dated September 17, 2013 approving the Cardno ERI Work Plan dated July 22, 2013. The first soil vapor sampling event (SVS1 through SVS3) was conducted on March 6, and 7, 2014. These results were included in the Soil, Soil Vapor, and Groundwater Investigation Report and Site Conceptual Model Report dated May 2, 2014 (ACEH approved an extension for this report to May 5, 2014). In the ACEH letter, it was requested that a second soil vapor sampling event be conducted approximately 6 months from the first event. Based on this, we plan to collect additional samples in late August of 2014. The letter requested that this report be submitted by June 16, 2014. We are requesting an extension for submittal of this report to October 10, 2014. If you should have any questions, please call or email. Thank you.

Greg Gurss
SR PROJECT MANAGER
CARDNO ERI



Phone (+1) 916-692-3100 **Fax** (+1) 707-789-0414 **Direct** (+1) 916-692-3130 **Mobile** (+1) 916-842-6486
Address 701 University Avenue, Suite 200, Sacramento, CA 95825
Email greg.gurss@cardno.com **Web** www.cardno.com www.cardnoeri.com

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ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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(510) 567-6700
FAX (510) 337-9335

July 7, 2014

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

(Sent via E-mail to:

jennifer.c.sedlachek@exxonmobil.com)

Mrs. Muriel Blank
Blank Family Trust
1164 Solano Ave., #406
Albany, CA 94706

Subject: Request for a Work Plan; Fuel Leak Case No. RO0002974 and GeoTracker Global ID T0619716673, Exxon, 990 San Pablo Ave., Albany, CA 94706

Dear Ms. Sedlachek and Mrs. Blank:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Soil, Soil Vapor, and Groundwater Investigation Report and Site Conceptual Model*, dated May 2, 2014, which was prepared and submitted on your behalf by Cardno ERI (Cardno) for the subject site. The report recommended work to address identified data gaps including the offsite monitoring of groundwater by the installation of two wells, and evaluation of seasonal soil vapor concentrations beneath the site to evaluate the risk of vapor intrusion at the site. In general, ACEH is in agreement with the proposed work; however, discusses differences in the sections below.

ACEH has previously evaluated the data and recommendations presented in the above-mentioned reports, in conjunction with the case files, to determine if the site is eligible for closure as a low risk site under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on the recent investigation and ACEH staff review, we have revised the checklist and have determined that the site fails to meet the Media-Specific Criteria for Groundwater and the Media-Specific Criteria for Vapor Intrusion to Indoor Air (see Geotracker for an updated copy).

Based on the review of the case file ACEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

1. **Request for a Work Plan** – ACEH requests the submittal of a work plan by the date referenced below.
 - a. **Groundwater Delineation** - The downgradient extent of the dissolved-phased groundwater plume remains undefined. It is appropriate to monitor the extent the offsite migration of the dissolved-phased plume to the south of the site utilizes the sanitary sewer installed at an approximate depth of 12.7 feet below grade surface (bgs) beneath Buchanan Street. The proposed installation of a well near bore B12 appears warranted. A second well was proposed to be installed near soil bore B8 to monitor the terminal end of the plume; however, ACEH requests that the well be placed near bore B9 due to the apparent split in the plume migration suggested by very low to trace grab groundwater sample concentrations collected from bores B8 and B10, and higher concentrations detected at soil bore B9 downgradient of offsite residential homes.

b. Seasonal Soil Vapor Evaluation – The referenced report also recommended seasonal soil vapor sampling. As communicated in previous directive letters ACEH is in agreement with this recommendation; however, ACEH requests the inclusion of Halogenated Volatile Organic Compounds (HVOCs) due to the documented, but unknown location, of a former waste oil underground storage tank (UST) at the site, and the detection of exceptionally high photoionization detector (PID) results in wells MW-3 and MW-4, and high results in MW-2, without the detection of significant petroleum hydrocarbon volatiles in soil samples collected at the time of well installation. The presence of sandy soils may also contribute to the generation of a subsurface vapor cloud; however, it is appropriate to verify that chlorinated solvents related to the former waste oil UST are not a part of this vapor.

An evaluation of the foundation of the building at the subject site, or of the immediately downgradient adjacent residential homes was not included in the referenced report. The September 17, 2013 directive letter requested the evaluation of the onsite and offsite residential buildings prior to installation of vapor wells at the site. Based on a review of the residential homes on Google Earth Street View, it appears that one residential foundation may be partially below grade. This may effectively reduce the minimum five foot separation distance allowed by one LTCP vapor intrusion scenario, but also affects the appropriateness of the vapor well installation depth under the LTCP (required to be five feet below building foundations). ACEH requests a review of these foundations be undertaken, and a discussion of the depth of the existing vapor wells relative to the foundations be provided by the date requested below.

2. Draft Feasibility Study / Corrective Action Plan – ACEH's evaluation of the vapor well results indicates that the site does not satisfy the LTCP Petroleum Vapor Intrusion to Indoor Air criterion. Based on ACEH's analysis, three of four vapor samples contained oxygen less than 4% oxygen, benzene concentrations in groundwater beneath the site were recently as high as 590 micrograms per liter ($\mu\text{g/l}$), and the bioattenuation zone at the site appears to be approximately 6 feet (greater than 5 feet, but less than 10 feet). This combination of site characteristics eliminates each available scenario within the LTCP Vapor Intrusion to Indoor Air criteria.

At this time, a Draft Feasibility Study / Corrective Action Plan (FS/CAP) prepared in accordance with Title 23, California Code of Regulations, Section 2725 appears warranted. The FS/CAP must include a concise background of soil and groundwater investigations performed in connection with this case and an assessment of the residual impacts of the chemicals of concern (COCs) for the site and the surrounding area where the unauthorized release has migrated or may migrate. The FS/CAP should also include, but is not limited to, a detailed description of site lithology, including soil permeability, and most importantly, contamination cleanup levels and LTCP appropriate cleanup goals in accordance with the San Francisco Regional Water Quality Control Board (SFRWQCB) Basin Plan. Should other non-petroleum contaminants be documented, other non-LTCP cleanup goals may be required, such as San Francisco Bay Regional Water Quality Control Board (RWQCB) Environmental Screening Levels (ESL) guidance for all COCs, or other generated site-specific risk-based goals. Please note that soil cleanup levels should ultimately (within a reasonable timeframe) achieve water quality objectives (cleanup goals) for groundwater in accordance with the SFRWQCB Basin Plan. Please specify appropriate cleanup levels and cleanup goals in accordance with 23 CCR Section 2725, 2726, and 2727 in the CAP.

The CAP must evaluate at least three viable alternatives for remedying or mitigating the actual or potential adverse affects of the unauthorized release(s) besides the 'no action' and 'monitored natural attenuation' remedial alternatives. Each alternative shall be evaluated not only for cost-effectiveness but also its timeframe to reach cleanup levels and cleanup goals, and ultimately the Responsible Party must propose the most cost-effective corrective action. Please submit the Draft FS/CAP by the date identified below.

- 3. Groundwater Monitoring** – Please continue semi-annual groundwater monitoring in accordance with the approved groundwater monitoring plan for the site and submit groundwater monitoring report in accordance with the schedule below. For the reason discussed above for vapor, please also include analysis for HVOCs on a one time basis. The appropriateness of additional HVOC sampling is requested to be evaluated thereafter.

TECHNICAL REPORT REQUEST

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

- **July 25, 2014** – Semi-Annual Groundwater Monitoring Report
File to be named: RO2974_GWM_R_yyyy-mm-dd
- **September 5, 2014** – Data Gap Investigation Work Plan and Foundation Analysis
File to be named: RO2974_WP_R_yyyy-mm-dd
- **September 19, 2014** – Draft Feasibility Study / Corrective Action Plan
File to be named: RO2974_DRAFT_FEASSTUD_R_yyyy-mm-dd
- **60 Days After Work Plan Addendum Approval** – Site Investigation Report
File to be named: RO2974_SWI_R_yyyy-mm-dd
- **December 5, 2014** – Semi-Annual Groundwater Monitoring Report
File to be named: RO2974_GWM_R_yyyy-mm-dd

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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address does not appear on the cover page of this notification, ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Thank you for your cooperation. If you have any questions, please call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,



Digitally signed by Mark E. Detterman
DN: cn=Mark E. Detterman, o, ou,
email, c=US
Date: 2014.07.07 14:39:33 -07'00'

Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations
Electronic Report Upload (ftp) Instructions

cc: Rebekah Westrup, Environmental Resolutions, Inc., 601 North McDowell Blvd., Petaluma, CA 94954 (Sent via E-mail to: rebekah.westrup@cardno.com)

Mrs. Marcia B. Kelly, 641 SW Morningside Rd., Topeka, KS 66615 (Sent via E-mail to: marciabkelly@earthlink.net)

Ms. Sedlachek and Mrs. Blank
RO0002974
July 7, 2014, Page 4

Rev. Deborah Blank, 1563 Solano Ave. #344, Berkeley, CA 94707 (Sent via E-mail to: miracoli@earthlink.net)

Dilan Roe, ACEH (Sent via E-mail to: dilan.roe@acgov.org)

Mark Detterman, ACEH (sent via electronic mail to mark.detterman@acgov.org)
GeoTracker, file



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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FAX (510) 337-9335

August 22, 2014

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

(Sent via E-mail to:

jennifer.c.sedlachek@exxonmobil.com)

Mrs. Muriel Blank
Blank Family Trust
1164 Solano Ave., #406
Albany, CA 94706

Subject: Conditional Work Plan Approval; Fuel Leak Case No. RO0002974 and GeoTracker Global ID T0619716673, Exxon, 990 San Pablo Ave., Albany, CA 94706

Dear Ms. Sedlachek and Mrs. Blank:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Work Plan for Well Installation*, dated July 7, 2014, and the *Groundwater Monitoring Report, First and Second Quarter 2014*, dated July 18, 2014, which were prepared and submitted on your behalf by Cardno ERI (Cardno) for the subject site. Thank you for submitting the reports.

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 work. 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 these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Work Plan Modifications** – The referenced work plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests a modification to the approach. Please submit a report by the date specified below.
 - a. **Subsurface Clearance Protocols** – The referenced work plan proposes to clear well bore locations with hand tools or an air knife. ACEH requests that clearance not include air knifing due to the likelihood of volatilization of light hydrocarbon fractions, in particular in the vicinity of soil bore B12 / MW7.

TECHNICAL REPORT REQUEST

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

- **September 19, 2014** – Draft Feasibility Study / Corrective Action Plan
File to be named: RO2974_DRAFT_FEASSTUD_R_YYYY-MM-DD

- **November 15, 2014** – Site Investigation Report
File to be named: RO2974_SWI_R_yyyy-mm-dd
- **December 5, 2014** – Semi-Annual Groundwater Monitoring Report
File to be named: RO2974_GWM_R_yyyy-mm-dd

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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address does not appear on the cover page of this notification, ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Thank you for your cooperation. If you have any questions, please call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,



Digitally signed by Mark E. Detterman
DN: cn=Mark E. Detterman, o, ou,
email, c=US
Date: 2014.08.22 15:31:19 -07'00'

Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations
Electronic Report Upload (ftp) Instructions

cc: Rebekah Westrup, Environmental Resolutions, Inc., 601 North McDowell Blvd., Petaluma, CA 94954 (Sent via E-mail to: rebekah.westrup@cardno.com)

Mrs. Marcia B. Kelly, 641 SW Morningside Rd., Topeka, KS 66615 (Sent via E-mail to: marciabkelly@earthlink.net)

Rev. Deborah Blank, 1563 Solano Ave. #344, Berkeley, CA 94707 (Sent via E-mail to: miracoli@earthlink.net)

Dilan Roe, ACEH (Sent via E-mail to: dilan.roe@acgov.org)

Mark Detterman, ACEH (sent via electronic mail to mark.detterman@acgov.org)

GeoTracker, file