



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

March 13, 2015

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

(Sent via E-mail to:

jennifer.c.sedlachek@exxonmobil.com)

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

Subject: Conditional Approval of the Feasibility Study / Corrective Action Plan; Fuel Leak Case No. RO0002974 and GeoTracker Global ID T0619716673, Exxon, 990 San Pablo Ave., Albany, CA 94706

Dear Ms. Sedlachek and Ms. Blank:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Groundwater Monitoring Report, Fourth Quarter 2014*, dated December 4, 2014, the *Well Installation Report*, dated January 22, 2015, and the *Feasibility Study / Corrective Action Plan (FS/CAP)*, dated February 4, 2015. The reports were prepared and submitted on your behalf by Cardno ERI (Cardno) for the subject site. Thank you for submitting the reports.

The FS/CAP proposes the installation of a High Intensity, Targeted (HIT) Dual Phase Extraction (DPE) system, using mobile remediation equipment, at the site. The mobile system is proposed to operate for periods of 5 to 30 days, but has the flexibility to extend the periods of operation depending on site specifics, such as contaminant extraction rates. The system is proposed to be operated at the site on a semi-annual basis in the 1st and 3rd quarters of a year, and groundwater monitoring is proposed to occur in the 2nd and 4th quarters to allow groundwater concentration stabilization in the interim period of time. Included in the system is the installation of four extraction wells, and the installation of one new groundwater monitoring well, to monitor groundwater concentrations in a downgradient location not currently monitored. The estimated period of time required for the proposed system to operate at the site is anticipated to be three years on the proposed schedule. Please be aware that the Low Threat Closure Policy (LTCP) generally expects that secondary source removal to occur within one year. This may require modifications to the approach to accelerate the rate of removal.

ACEH is in general agreement with the recommendations; however, requests the generation of a detailed Remedial Action Implementation Plan (system design drawings and specifications), modification of the proposed approach, based on rate of extraction, in order to meet LTCP policy, generation of a draft Public Comment Fact Sheet for the required 30 day public comment period (examples will be forwarded separately), and the submittal of a signed *List of Landowners Form* as requested and detailed below.

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. Downgradient Dissolved-Phase Plume Definition** - The well installation report documented the installation of wells MW7 and MW8 downgradient of the site in order to define the downgradient extent of the dissolved-phase plume. The report recommended the installation of one additional well near the intersection of Adams and Buchanan Streets to monitor groundwater at the location due to groundwater concentrations at bore B9. ACEH is in agreement with this recommendation, but additionally requests the installation a second well at the location of B9 as previously requested in the

July 7, 2014 directive letter. Please submit a brief work plan by the date referenced below. Existing standard field protocol descriptions can be used for the work plan.

- 2. Remedial Design Implementation Plan** - As noted above, ACEH generally concurs that DPE may be an effective alternative to remediate petroleum hydrocarbons in soil and groundwater at the site. At present one pilot test has been conducted to determine the system radius of influence (ROI) at the site, however, it was conducted within the former UST excavation, which may not be fully representative of the area outside the former excavation. Therefore, please expand upon the DPE conceptual plans presented in the FS/CAP in a Remedial Design Implementation Plan (RDIP). Implementation details should include, but not be limited to, the following:
 - Detailed description of proposed remediation including confirmation sampling and monitoring during implementation.
 - Operation and maintenance plans.
 - System optimization and performance metrics.
 - Post-remediation monitoring and verification plans with proposed strategy for collecting groundwater, soil and soil vapor monitoring and confirmation samples.
 - Implementation schedule with milestone dates.
 - Updated cleanup goals utilizing the 2013 Regional Water Quality Control Board - San Francisco Region's Environmental Screening Levels and Low Threat Closure Policy screening levels for petroleum hydrocarbons.
 - A strategy for collecting soil data within the upper 10 feet of soil at the site during DPE well installation, if appropriate, to fulfill the requirements for the LTCP Media Specific Criteria for Direct Contact and Outdoor Air.
- 3. Draft Public Participation Fact Sheet** – A draft public notification fact sheet has not been generated for the site yet. Public participation is a requirement for the remedial process. Examples will be forwarded separately. Please return a draft copy by email to my attention. Upon ACEH approval of the document, ACEH will notify potentially affected members of the public who live or own property in the surrounding area of the proposed remediation described in the FS/CAP. Public comments on the proposed remediation will be accepted for a 30-day period. Upon termination of the 30-day comment period ACEH will notify ExxonMobil of the results of the comment period and any required modifications to the proposed approach, if any.
- 4. Remedial Action Progress Reporting** – The current planned or estimated period for remedial activities is approximately three years, and may be modified based on LTCP policy. Therefore, at a minimum, quarterly Remedial Progress Reports (RPR) will be requested. These are intended to monitor site progress and DPE system effectiveness.
- 5. Groundwater Monitoring** – ACEH will initially request that groundwater monitoring occur at quarterly intervals during corrective action activities and one year post remediation. Please continue to include chlorinated solvents by EPA 8260 in the analytical suite. Concentrations up to 85 micrograms per liter ($\mu\text{g/l}$) tetrachloroethene and 9.8 $\mu\text{g/l}$ trichloroethene (TCE) were detected in wells along the eastern boundry of the site. The analysis was conducted outside of the hold period, thus the concentrations have the potential to be higher.
- 6. Storm Drain Location** – Storm drain lines are depicted onsite, but are not depicted offsite. In future site figures, please additionally identify the location and depth of storm drainage lines off the site.
- 7. Landowner Notification** - Pursuant to Section 25297.15 (a), ACEH, the local agency, shall not consider cleanup or site closure proposals from the primary or active responsible party, issue a closure letter, or make a determination that no further action is required with respect to a site upon which there was an unauthorized release of hazardous substances from an underground storage tank subject to this chapter unless all current record owners of fee title to the site of the proposed action have been notified of the proposed action by the primary or active responsible party. ACEH is required to notify the primary or active responsible party of their requirement to certify in writing to the

local agency that the notification requirement in the above-mentioned regulation has been satisfied and to provide the local agency with a complete mailing list of all record fee title owners.

To satisfy the above-mentioned requirement, please complete the attached, "List of Landowners Form," and mail it back to ACEH by the date specified below.

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 specified file naming convention below, according to the following schedule:

- **April 24, 2015** – Return Completed Landowner Notification Form and Draft Public Comment Fact Sheet; File to be named: RO2974_LNDOWNR_F_L_YYYY-MM-DD
- **May 22, 2015** – Data Gap Investigation Work Plan
File to be named: RO2974_WP_R_YYYY-MM-DD
- **May 22, 2015** – Remedial Design Implementation Plan
File to be named: RO2974_CAP_R_YYYY-MM-DD
- **July 10, 2015** – Semi-Annual Groundwater Monitoring
File to be named: RO2974_GWM_R_YYYY-MM-DD
- **60 Days After Groundwater Monitoring Well Installation** – First DPE Post Implementation Quarterly Groundwater Monitoring and Well Installation Report; File to be named: RO2974_GWM_R_YYYY-MM-DD
- **January 15, 2016** – Quarterly Groundwater Monitoring
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.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

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

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

List of Landowners Form

cc: Christine Capwell, Cardno ERI, 601 North McDowell Blvd., Petaluma, CA 94954 (Sent via E-mail to: christine.capwell@cardno.com)

Greg Gurss, Cardno ERI, 601 North McDowell Blvd., Petaluma, CA 94954 (Sent via E-mail to: greg.gurss@cardno.com)

David Daniels, Cardno ERI, 601 North McDowell Blvd., Petaluma, CA 94954 (Sent via E-mail to: david.daniels@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 electronic mail to dilan.roe@acgov.org)

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

Electronic File, GeoTracker

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to 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 Instructions." 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 all 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, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

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

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- 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)

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 deh.loptoxic@acgov.org
 - 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, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - 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 deh.loptoxic@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 @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) If site is a new case without an RO#, use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.

LIST OF LANDOWNERS FORM

County of Alameda
Environmental Health Services
Environmental Protection
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR:

Site Name: Exxon
Address: 990 San Pablo Ave.
City, State, Zip: Albany, CA 94706
Record ID #: RO0000350

Please fill out item 1 if there are multiple site landowners (attach an extra sheet if necessary). If you are the sole site landowner, skip item 1 and fill out item 2.

1. In accordance with Section 25297.15(a) of Chapter 6.7 of the California 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:

Name: _____
Address: _____
City, State, Zip: _____
E-mail Address: _____

Name: _____
Address: _____
City, State, Zip: _____
E-mail Address: _____

Name: _____
Address: _____

Name: _____
Address: _____

2. In accordance with Section 25297.15(a) of Chapter 6.7 of the California Health & Safety Code, I _____, certify that I am the sole landowner for the above site.

Sincerely,

Signature of Primary Responsible Party Printed Name Date E-mail Address