

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

COLLEEN CHAWLA, Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY, SUITE 250
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

August 22, 2018

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

(Sent via electronic mail to:
jennifer.c.sedlachek@exxonmobil.com)

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

Subject: Request for Work 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 Department of Environmental Health (ACDEH) staff has reviewed the case file for the above referenced site including the *Sub Slab Soil Vapor Assessment Report*, dated January 30, 2018, the *Semi-Annual Soil Vapor Assessment, First Quarter 2018*, dated May 10, 2018, the *Semi-Annual Groundwater Monitoring and Remediation Status Report*, dated May 22, 2018, and several stand-alone *Remediation Status Report (s)*, dated January 18, 2018, and August 6, 2018. The reports were prepared and submitted on your behalf by Cardno. Thank you for submitting them. Additionally, thank you for attending the meeting on February 2, 2018; it was useful in identifying potential areas of concern as the case moves into remediation.

The referenced *Sub Slab Soil Vapor Assessment Report* documented the installation of subslab vapor pins SS1 to SS3, and reported subslab vapor concentrations below residential Environmental Screening Levels (ESLs) as promulgated by the San Francisco Bay Regional Water Quality Control Board (RWQCB), at a commercial property. The *Semi-Annual Soil Vapor Assessment, First Quarter 2018* documented the collection of semi-annual vapor samples from deeper vapor wells (5.5 foot depth) SVS1, SVS2, and SVS3 as discussed in the February 2, 2018 meeting, due to uncertainty in the validity of shallower vapor wells installed to 2.2 feet below grade surface (bgs) due to essentially atmospheric concentrations of oxygen and nitrogen in the shallow wells. Concentrations in the sampled wells remained similar to, and significantly above ESLs, previous vapor concentrations in the wells. The report also cited technical literature that previously had documented atmospheric oxygen concentrations can be expected up to 2.5 feet bgs at an underground storage tank (UST) site.

The *Remediation Status Report (s)* document progress in the installation of the Soil Vapor Extraction (SVE) remedial system at the site, and documented system metrics from start up on February 19, 2018 through June 11, 2018. The most recent of these reports documented the removal of approximately 95 pounds of Total Petroleum Hydrocarbons and trace benzene from the subsurface at the site.

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

TECHNICAL COMMENTS

- 1. Work Plan Request** – Data provided in the *Sub Slab Soil Vapor Assessment Report*, suggests that subslab vapor concentrations beneath the sidewalk apron immediately south of the existing commercial building are protective of employees at the facility. As discussed in the February 2, 2018 meeting, ACDEH requests communication with the downgradient residential property and the generation of a work plan for the concurrent collection of an outdoor air, subslab, and indoor air vapor samples at the residence due to the unknown condition of the concrete slab at the house, and higher vapor

concentrations at SVS1 and SVS2. The results will inform the previously discussed need to collect similar samples at the onsite commercial building. Please submit a work plan for this work by the date identified below. ACDEH additionally requests completion of the public notification to the adjacent residential property by the date identified below.

2. **Additional SVE Well Work Plan** – Due to order-of-magnitude declines in the influent vapor concentrations at the site since system start-up, ACDEH is in agreement with the installation of additional SVE wells with different screen intervals. As a part of this task, please evaluate the well network with respect to the shallow and deep groundwater bearing zones reported at the site, and include any appropriate recommendations to improve system performance and groundwater monitoring. Please submit a brief work plan identifying location, screen interval rationales, and other pertinent tasks to improve site remediation and monitoring.
3. **Semi-Annual Vapor Monitoring** – Due to the substantial vapor concentration fluctuations in soil vapor wells at the site, the recommended semi-annual soil vapor sampling to further evaluate soil vapor concentrations appears appropriate due to potentially sensitive population (residential), and Department of Toxic Substances Control (DTSC) guidance. Please submit the results of the vapor sampling in a report by the dates identified below.
4. **Semi-Annual Groundwater Monitoring** – Please continue to conduct groundwater monitoring and sampling at the site on a semi-annual basis, and submit reports by the dates identified below.

TECHNICAL REPORT REQUEST

Please submit the following technical reports and deliverables to the State Water Board's Geotracker website and notify your case worker by electronic mail (mark.detterman@acgov.org), in accordance with the following specified file naming convention and schedule, as provided below, and in the Responsible Party(ies) Legal Requirements/Obligations which is included as Attachment 1. Please note ACDEH no longer accepts reports on the ftp site.

- **September 28, 2018** – Final Draft Wording for Public Notification
Please email your case worker with the final draft wording.
- **October 19, 2018** – Semi-Annual Soil Vapor Report
File to be named: RO2974_SWI_R_yyyy-mm-dd
- **October 26, 2018** – Soil Vapor Intrusion, SVE Well, and Monitoring Well Modification Work Plans (can be combined with above); File to be named: RO2974_WP_R_yyyy-mm-dd
- **December 17, 2018** – Second 2018 Semi-Annual Groundwater Monitoring and Remedial Progress Report; File to be named: RO2974_GWM_REM_R_yyyy-mm-dd
- **April 26, 2019** – Semi-Annual Soil Vapor Report and Remedial Progress Report
File to be named: RO2974_SWI_REM_R_yyyy-mm-dd
- **June 28, 2019** – First 2019 Semi-Annual Groundwater Monitoring and Remedial Progress Report
File to be named: RO2974_GWM_REM_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 is not listed on the first page of this letter, or in the list of cc's listed below, ACDEH is requesting your email address to help expedite communications and to help lower overall costs.

Ms. Sedlachek and Ms. Blank
RO0002974
August 22, 2018, Page 3

Should you have additional 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 4799, CEG 1788
Senior Geologist
Senior Hazardous Materials Specialist

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

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

David Daniels, Cardno, 601 North McDowell Blvd., Petaluma, CA 94954
(Sent via electronic mail to: david.daniels@cardno.com)

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

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

Dilan Roe, ACDEH, (Sent via electronic mail to: dilan.roe@acgov.org)
Paresh Khatri, ACDEH; (Sent via electronic mail to: paresh.khatri@acgov.org)
Mark Detterman, ACDEH, (Sent via electronic mail to: mark.detterman@acgov.org)
Electronic File; GeoTracker

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) 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 licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.