ExxonMobil Environmental Services Company 4096 Piedmont Avenue #194 Oakland, California 94611 510 547 8196 Telephone 510 547 8706 Facsimile Jennifer C. Sedlachek Project Manager

# **E**%onMobil

September 22, 2016

RECEIVED

By Alameda County Environmental Health 3:11 pm, Sep 22, 2016

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 *Remedial Progress Report* dated September 22, 2016, for the above-referenced site. The report was prepared by Cardno of Petaluma, California, and details activities related to 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,

jedlu chit

Jennifer C. Sedlachek Project Manager

Attachment: Cardno's Remedial Progress Report, dated September 22, 2016

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. Scott Perkins, Cardno



September 22, 2016 Cardno 2735C.R13

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

601 N. McDowell Boulevard Petaluma, CA 94954 USA

 Phone:
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 +1 707 789 0414

 Contractor:
 #997036

www.cardno.com

SUBJECTRemedial Progress ReportFormer Exxon Service Station 79374990 San Pablo Avenue, Albany, California

Alameda County Department of Environmental Health RO 0002974

Ms. Sedlachek:

At the request of ExxonMobil Environmental Services (EMES), on behalf of Exxon Mobil Corporation, Cardno prepared this remedial progress report for the subject site, as requested by the Alameda County Health Care Services Agency, Environmental Health Services (ACEH), in a letter dated May 16, 2016 (Appendix A).

### SITE DESCRIPTION

Former Exxon Service Station 79374 is located at 990 San Pablo Avenue, on the northwestern corner of the intersection of Buchanan Street and San Pablo Avenue, Albany, California. A retail outlet for Benjamin Moore paints and painting products and associated asphalt parking area currently occupies the site. The surrounding areas consist of residential and commercial properties. The City of Albany Fire Department and Police Department are located south of the site on Buchanan Street.

### **REMEDIAL PROGRESS**

On August 11, 2016, Cardno provided additional information to the Bay Area Air Quality Management District (BAAQMD) to allow the revision of an existing permit to be used in the proximity of a public school. The additional

information was requested by the BAAQMD on July 27, 2016 (Appendix A), prior to beginning the public notification required due to the site's proximity to a public school. The BAAQMD indicated that the submittal would be acted on within 21 days of receipt and the permit should be issued within 49 days following.

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### WORK IN PROGRESS

Based on the BAAQMD correspondence, Cardno anticipates receiving the permit during fourth quarter 2016. Remediation activities cannot begin until the approved permit from the BAAQMD is received.

## 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. Scott Perkins, Cardno's project manager for this site, at <u>scott.perkins@cardno.com</u> or at (707) 766-2000 with questions regarding the subject site.

Sincerely,



Scott Perkins Senior Project Manager for Cardno Direct Line 707 766 2000 Email: <u>scott.perkins@cardno.com</u>

Enclosures:

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



Appendix A

Correspondence

September 22, 2016 Cardno 2735C.R13 Former Exxon Service Station 79374, Albany, California

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

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

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

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

## **APPENDIX A**

## CORRESPONDENCE

ALAMEDA COUNTY HEALTH CARE SERVICES



**REBECCA GEBHART**, Acting Director

AGENCY

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

May 16, 2016

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: Request for Interim Vapor Intrusion Evaluation; 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 *Response to Request for Work Plan and Remedial Progress Report*, dated March 24, 2016. The response was prepared and submitted on your behalf by Cardno. Thank you for submitting the reasoning and thoughts. They are appreciated, and help to move the site forward towards a common understanding of how to the site forward.

Based on a review and analysis of the correspondence and site data, ACDEH has modified its previous request, but also communicates reasoning behind previous requests. As with the previous letter, the order of the topics follows the previous letter. ACDEH requests that you address the following technical comments and send us the documents requested below.

#### TECHNICAL COMMENTS

- Secondary Source Has Been Removed to the Extent Practicable ACDEH is in general agreement that the proposed corrective actions will reduce the currently undefined magnitude of secondary source contaminate concentrations in the former underground storage tank (UST) hold, and that documenting the satisfactory removal of that secondary source can await completion of corrective actions.
- 2. LTCP Media Specific Criteria for Groundwater ACDEH is in agreement that it is premature to initiate additional plume delineation to the west (wells MW8 and MW9), and is also in agreement that the subject site is not the source of Halogenated Volatile Organic Compounds (HVOCs) documented at the former Firestone facility at 969 San Pablo Avenue (RO0000119 and T0600101674), nor does it appear that Firestone is the source of HVOCs at the subject site. The HVOCs at each location appear to be sufficiently different, and can be distinguished as different, thereby indicating the likelihood of separate sources.

Please be aware that ACDEH remains sufficiently concerned in regards to the undefined southern extent of HVOCs. ACDEH acknowledges that it appears that the City of Albany Fire Department and Police Station have imposed restrictive limitations on the ability to determine the extent of contamination towards the south of the subject site and the presence of an adequate level of protection to occupants of those buildings. This was not previously known or understood. ACDEH appreciates the appropriateness and cost-effectiveness of the offer to reanalyze groundwater laboratory analytical data from soil bores B8, B10 through B13, and B15 for tetrachloroethene (PCE) and trichloroethene (TCE) as a first step towards resolving the concern. Please be cognizant that if reanalysis is inconclusive, it may be appropriate to request and schedule a meeting of all parties in order to determine solutions and appropriate next steps.

Ms. Sedlachek and Mrs. Blank RO0002974 May 16, 2016, Page 2

3. Vapor Intrusion – First, thank you for clarifying that the grade difference between the subject site and the neighboring downgradient offsite residential house is de minimus and not several feet as at appears on the Goggle Earth Street View. ACDEH also appreciates the appropriate use of a pathway endorsed by the Department of Substances Control (DTSC; essentially proceeding to corrective actions); however, is concerned with potential exposures to undetermined receptors during the interim period between discovery of the potential concern and implementation or completion of the corrective actions. The moderately extended time period proposed for remediation (differing from the Low Threat Closure Policy expectation that the removal of the secondary (residual) mass will be completed in one year or less) also factors into this concern.

A consequence of the proposed corrective action time period is the request for an interim evaluation of the site commercial building and the adjacent residential house for the potential of vapor intrusion. This includes the nature of the construction and layout of the building and house, identification of occupants, ages, and other critical risk factors, potential indoor air or sub-slab vapor sampling, and the determination of any appropriate and applicable short-term mitigation measures. Therefore, ACDEH requests a preliminary evaluation of the site building and adjacent house, and occupants, and the submittal of a vapor intrusion work plan, as necessary, by the date identified below.

- 4. HIT System Reporting and BAAQMD Site Specific Permit To accommodate the anticipated extended BAAQMD permit application process, ACDEH has extended the submittal timelines listed below. Should additional extensions be required, please notify the undersigned with the reason for the extension in order for the site to remain in compliance with state regulations.
- Groundwater Monitoring and Analytical Data Thank you for including additional analytes in the data tables. The time invested is anticipated to expedite the review and understanding of the site and submittals.

#### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACDEH 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:

- July 15, 2016 Second Quarter 2016 Semi-Annual Groundwater Monitoring; File to be named: RO2974\_GWM\_REM\_R\_yyyy-mm-dd
- July 29, 2016 Vapor Intrusion Evaluation; Work Plan File to be named: RO2974\_WP\_R\_yyyy-mm-dd
- September 23, 2016 Remedial Progress Report File to be named: RO2974\_REM\_R\_yyyy-mm-dd
- **60 Days After Work Plan Approval** Site Investigation Report File to be named: RO2974\_SWI\_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: <u>http://www.acgov.org/aceh/index.htm</u>. 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 Mrs. Blank RO0002974 May 16, 2016, Page 3

ACDEH appreciates work progress at the site and your cooperation. 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,

Marke An

Digitally signed by Mark Detterman DN: cn=Mark Detterman, o=ACEH, ou=ACEH, email=mark.detterman@acgov.org, c=US Date: 2016.05.16 14:01:41 -07'00'

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

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

cc: Scott Perkins, Cardno, 601 North McDowell Blvd., Petaluma, CA 94954 (Sent via E-mail to: <u>scott.perkins@cardno.com</u>)

David Daniels, Cardno, 601 North McDowell Blvd., Petaluma, CA 94954 (Sent via E-mail to: <u>david.daniels@cardno.com</u>)

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, ACDEH, (sent via electronic mail to <u>dilan.roe@acgov.org</u>) Mark Detterman, ACDEH, (sent via electronic mail to <u>mark.detterman@acgov.org</u>) Electronic File, GeoTracker



### BAY AREA AIR QUALITY MANAGEMENT DISTRICT 375 BEALE STREET, SUITE 600 SAN FRANCISCO, CA 94105 (415) 771-6000 WWW.BAAQMD.GOV



July 27, 2016

BY: .....

Cardino 601 N. McDowell Blvd. Petaluma, CA 94954

## Attention: Mathew T. Herman

Application Number: 28112 Plant Number: 23468 Equipment Location: Portable Source @ 990 San Pablo Avenue Albany, CA

## Dear Mr. Herman:

Your application to obtain a permit to operate the following equipment at 990 San Pablo Avenue, Albany, CA:

- S-1 Portable Air Sparge/Dual- Phase Extraction System (Regenerative Vacuum Pump), Nash-Elmo, 10 hp, 300 cfm, abated by A-1 or A-2
- A-1 Electric Catalytic Oxidizer, Falmouth Products, FALCO-300, 350 cfm.
- A-2 Activated Carbon Adsorption System (2 vessels arranged in series, 200 lb carbon each), Siemens, VSC-200.

has been assigned the above application number and is currently incomplete. In order to complete our evaluation, we need the following:

- 1. Complete application form P-101B.
- 2. Provide a copy of the soil vapor analytical report for this site and provide calculations to demonstrate compliance with part 7 of the permit condition ID# 26302.
- 3. The fee invoice is enclosed. It may be reassessed based on the information to be submitted.

The District's Regulation 3 contains the fee schedule for new and renewed permits.

Please submit the above items and your fee within 60 days or the application will be canceled. Make your check payable to the "BAAQMD" and include your application number on the check. Also include the enclosed remittance copy. Your submittal will be acted upon within 21 days of receipt of the above items, and if complete, your permit will be issued within 49 days. Construction or operation of equipment without an Authority to Construct or Permit to Operate will result in appropriate enforcement action.

Under the California Public Records Act, all information in your permit application will be considered a matter of public record and may be disclosed to a third party. If you wish to keep certain items separate as specified in Regulation 2 Rule 1 Section 202.7, please circle those items in your submittals, write "confidential" at the top of the page and append a written explanation for your confidentiality request.

Please include your application number with any correspondence with the District. If you have any further questions, please call me at (415) 749-4714 (fax 415-749-5030; dsingh@baaqmd.gov).

Very truly yours,

Dharam Singh, PE Air Quality Engineer II

DS:ds encl