

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

REBECCA GEBHART, Interim 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

December 14, 2016

Ms. Rita Sullins (*Sent via E-mail to: tonynrita@comcast.net*)

Don Sul, Inc.
187 North L Street
Livermore, CA 94550

Ms. Jennifer Sedlacheck (*Sent via E-mail to: jennifer.c.sedlachek@exxonmobil.com*)

Exxon Mobil
4096 Piedmont, #194
Oakland, CA 94611

Subject: Case File Review for Fuel Leak Case No. RO0000394 and GeoTracker Global ID T0600100116, Arrow Rentals, 187 North L Street, Livermore, CA 94550

Dear Ms. Sullins and Ms. Sedlacheck:

Thank you for participating in the meeting on September 19, 2016. Attendees of the meeting included Don and Rita Sullins (Responsible Parties – via conference call); Jenny Weese and Eric Price (Ground Zero Analysis, Inc. [GZA] – via conference call), Ray Kablanow (GZA – in person); Dilan Roe and Kit Soo (Alameda County Department of Environmental Health, ACDEH – in person). The purpose of the meeting was to discuss the status of the project, discuss the comments and requested data presented in ACDEH's email directive dated July 29, 2016, as well as to introduce myself as the new case worker for this site. A summary of our discussion items, technical comments and actions items are presented below.

The site is currently occupied by Arrow Rentals which is a tool and equipment rental facility. The site is located in a mixed residential/commercial/industrial area in Livermore. A residential development is located immediately to the south and west, commercial properties are located to the east beyond L Street, and to the north are railroads, beyond which are commercial/industrial type facilities and residences. It is our understanding that in 1972 and 1986, a total of five former underground storage tanks (USTs) containing gasoline product were removed from the site. The source of impacts are reported to be from the former USTs and associated piping as well as a 1985 incident in which a petroleum supplier pumped up to 600 gallons of gasoline into a vapor monitoring well adjacent to a 1,000 gallon UST (Pitcock Release). In 1992, impacted soil was excavated to a depth of approximately 6 to 8 feet below ground surface (bgs) during product piping removal. Numerous investigations which included the installation of soil borings, monitoring wells and soil gas survey (1998 and 2005) were performed between 1988 and present. In November 2011, a dual phase extraction (DPE) system, was installed at the site, followed by an air sparging (AS) system which began in March 2012 to address the remediation of gasoline and diesel range constituents (Total Petroleum Hydrocarbons as Gasoline [TPH-g], TPH as Diesel [TPH-d], benzene, toluene, ethylbenzene, xylenes [BTEX] which are constituents of concern (COC) at the site.

Based on our review of the above-mentioned reports and our discussions during the September 19, 2016 meeting, ACDEH request that you address the technical comments listed below.

TECHNICAL COMMENTS

1. Groundwater Monitoring, System Evaluation and Optimization Strategy

- Plume Delineation – Data in the case file and a review of Figure 4 presented in the *First Semi-Annual Groundwater Monitoring and Remediation Effectiveness Report*, dated June 6, 2016, prepared by GZA on your behalf indicates there are four groundwater bearing zones at the site (shallow, intermediate, deep and deepest). The shallow zone is defined as being from approximately 20 to 45 feet bgs, the intermediate zone from 40 to 60 feet bgs, the deep zone from 62 to 68 feet bgs, and the deepest zone from 70 to 85 feet bgs. The monitoring network consists of long screened wells and discrete CMT wells, with some wells screened through multiple zones. As discussed in our meeting, please evaluate the adequacy of the monitoring well network to define the extent of the plume at each historical release location at the site. The evaluation should include a figure with the rose diagram showing historical groundwater flow directions and gradients at each release location to use as a guide in this assessment. Additionally, please prepare a table presenting monitoring well construction details (screened intervals, depth to water, submerged screen conditions, obstructed wells, etc.) using information presented on Figure 4 and historical monitoring well data. The evaluation shall include recommendations for further plume delineation, and monitoring well rehabilitation (i.e. replacements, removals of obstructions, etc.). The plume length with respect to its distance from water supply well or surface water body should be considered as well. Refer to Technical Justification for Groundwater Media-Specific Criteria, RWQCB, 04/24/2012, if needed.

All the shallow CMT wells have been dry since 2006 and no samples have been collected, with the exception of a sampling event in 2007, where concentrations in CMT monitoring well MW-4 for TPH-g and BTEX were 460,000 micrograms per liter (ug/L), 24,000 ug/L, 21,000 ug/L, 3,800 ug/L, and 19,000 ug/L, respectively. Due to the lack of groundwater for sampling in the shallow zone, alternative methods such as soil verification sampling must be proposed to verify the remediation effectiveness to the shallow groundwater zone.

- System Evaluation and Optimization Strategy – The DPE/AS system was shut off on August 26, 2016, and the last sampling event performed prior to system shutdown was performed in May 2016. Groundwater monitoring and sampling in all existing wells must be performed to assess for rebound conditions and the effectiveness of the remediation system. Please include the remediation system data in a remediation system evaluation to assess the effectiveness of the remedial strategy. Please include recommendations for modifications/optimizations to the remedial strategy as warranted.

All action items requested above will be presented in the next Semi-Annual Groundwater Monitoring and Remediation Effectiveness Report, and as indicated in the Technical Report Request section mentioned below.

2. Consideration to the Low Threat Closure Policy (LCTP) Residential Requirements

ACDEH understands that options for residential development may be considered in the future. To assist you in your decision making process for potential residential development, please include both commercial and residential screening levels in all your data tables. Please note and as discussed in the meeting that the State Underground Storage Cleanup Fund will reimburse for cleanup activities associated with the existing land use, unless site development plans are in progress with the planning department

3. Response to Previous Comments Outlined in the Email Directive, dated July 29, 2016

As per the previous email directive dated July 29, 2016, the following responses are related to certain items requested:

- Potential vapor intrusion issue offsite (to the south of the site) – The parcel adjacent to the southern property line was redeveloped into residential sometime after 2005. A soil gas investigation was conducted in 2005 and concluded that there was no vapor intrusion risk present based on the Regional Water Quality Control Board (RWQCB) ESLs (Soil-Gas Investigation Report, Arrow Rentals Property, 187 North “L” Street, Livermore, California, dated December 2005, prepared by Fugro West, Inc.).
- Potential vapor intrusion onsite – Please note that this onsite vapor intrusion risk must be evaluated using the State’s LCTP criteria rather than the RWQCB ESLs. Subsequent to the collection of additional data for plume delineations, please re-evaluate the vapor intrusion risk onsite and to offsite receptors based on the extent of the plume, and provide recommendations for additional work if warranted.
- Updated Well Survey – A Well Receptor Report was prepared and submitted by GZA on August 29, 2016. As mentioned in bullet number 1 above, further assessment is required to determine the plume length with respect to its distance from water supply wells or surface water bodies. Refer to Technical Justification for Groundwater Media-Specific Criteria, RWQCB, 04/24/2012, if needed.

All action items requested above will be presented in the next Semi-Annual Groundwater Monitoring and Remediation Effectiveness Report, and as indicated in the Technical Report Request section mentioned below.

TECHNICAL DOCUMENT REQUEST

Please upload the documentation to the ACDEH ftp site (Attention: Kit Soo) and to the State Water Resources Control Board’s GeoTracker website according to the following schedule and naming convention:

- **January 31, 2017** – Second Semi-Annual 2016 Groundwater Monitoring and Remediation Effectiveness Report
File to be named: RO0394_GWM_R_yyyy-mm-dd

If you would like a meeting to discuss the January 31, 2017 deliverables, please let us know and we can schedule it.

Sincerely,

Kit Soo, California PG 8957
Senior Hazardous Materials Specialist

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

cc: Danielle Stefani, Livermore Pleasanton Fire Department, 3560 Nevada St, Pleasanton, CA 94566
(Sent via E-mail to: dstefani@lpfire.org)

Colleen Winey (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551
(Sent via E-mail to: cwiney@zone7water.com)

Eric Uranga, City of Livermore, Economic Development, 1052 S. Livermore Ave., Livermore, CA 94550 (Sent via E-mail to: ejuranga@ci.livermore.ca.us)

Ray Kablanow, Ground Zero Analysis, Inc., 1172 Kansas Avenue, Suite A, Modesto, CA 95351
(Sent via E-mail to: rayk@groundzeroanalysis.com)

Eric Price, Ground Zero Analysis, Inc., 1172 Kansas Avenue, Suite A, Modesto, CA 95351 (Sent via E-mail to: eprice@groundzeroanalysis.com)

Jenny Weese, Ground Zero Analysis, Inc., 1172 Kansas Avenue, Suite A, Modesto, CA 95351
(Sent via E-mail to: jweese@groundzeroanalysis.com)

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

Paresh Khatri, ACEH (Sent via E-mail to: paresh.khatri@acgov.org)

Kit Soo, ACEH (Sent via E-mail to: kit.soo@acgov.org)

GeoTracker, eFile

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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) 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 File Transfer Protocol (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 SCP 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 (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/) for more information on these requirements.

PERJURY 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 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, late 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 SCP)	REVISION DATE: December 1, 2016
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions


The Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) 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) Open File Explorer using the Windows  key + E keyboard shortcut.
 - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) On the address bar, type in ftp://alcoftp1.acgov.org.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
 - d) Click Log On.
 - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - f) 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.