



July 17, 2018

Mr. Kia Sumner (Sent via E-mail to: kiasumner@yahoo.com)
1069 Oak Hills Road
Lafayette, CA 94549-3136

Subject: Technical Report Request for Fuel Leak Case No. RO0000159 and Geotracker Global ID T0600100274, Mobil, 3635 13th Avenue, Oakland, CA - Expedited Claim Account Pilot Program (ECAP): Joint Execution Team (JET) Conference Call, Underground Storage Tank (UST) Claim #9184

Dear Mr. Sumner:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case files for the above referenced site including the following documents prepared and submitted on your behalf by AEI Consultants, Inc. (AEI):

- September 18, 2015 *Draft Feasibility Study/Corrective Action Plan (draft FS/CAP)* (submitted only to ACDEH by e-mail)
- March 15, 2016 *Work Plan, Additional Site Investigation (Work Plan)*
- November 13, 2017 *Soil, Groundwater, and Soil Vapor Investigation and Updated CSM Report (SWI-CSM Report)*
- February 8, 2018 *Semiannual Groundwater Monitoring and Sampling Report, Second Semester 2017 (GWM Report)*

ACDEH has determined that the site does not meet the LTCP General Criteria e (Site Conceptual Model), Media-Specific Criteria for Groundwater and Media-Specific Criteria for Vapor Intrusion to Indoor Air. The case appears to meet the Media-Specific Criteria for Direct Contact for Commercial – Industrial - Utility Worker.

A Joint Execution Team (JET) conference call was held on June 27, 2018 to determine the next steps. During the call, the responsible party (RP) and the consultant verified that the City of Oakland has rezoned the site to residential and the RP intends to build a single-family home with a raised foundation at the site. ACDEH generally concurred with the locations of the two proposed excavations described in the draft *FS/CAP* previously submitted to ACDEH:

- An area measuring approximately 20-feet by 20-feet encompassing two of the former underground storage tank (USTs);
- An area measuring approximately 16-feet by 50-feet encompassing an area with elevated Total Petroleum Hydrocarbons (TPH) in soil and groundwater.

As discussed during the JET call, the general consensus was to request submittal of a draft Revised Corrective Action Plan (CAP) which addressed the following technical comments by the date requested below.

TECHNICAL COMMENTS

A. Request for a draft Revised Corrective Action Plan and Updated Site Conceptual Model:

1. **Request to update the Site Conceptual Model:** Please update the Site Conceptual Model using all historical and current soil, soil gas, and groundwater data.

2. **Request for a Rose Diagram:** Please provide an updated rose diagram with every technical report submitted from this time forward to inform understanding of historical and current groundwater flow direction, on-and off-site sensitive receptors, and potential preferential receptors.
 3. **Request for Updated Cross-Sections:** Please include updated cross sections indicating the following information:
 - i. Soil, soil vapor, and groundwater concentrations that will illustrate the lateral and vertical extent of contamination in soil, soil vapor, and groundwater in relation to the proposed excavations;
 - ii. The type, location, and depth of all underground utilities both on- and off-site;
 - iii. Vertical and horizontal extent of fill placed after the over-excavation of the waste oil UST;
 - iv. Locations of all former site structures including, but not limited to: the “office and mechanics shop”, the three former USTs and the pump island indicated in grey on all site figures and cross sections.
 4. **Public Participation Requirement:** Public participation is a requirement for the Corrective Action Plan process. Therefore, we request submittal of a draft Revised CAP for ACDEH review. Upon ACDEH approval of the draft Revised CAP, ACDEH will request finalization and upload to Geotracker of the CAP and will notify potentially affected members of the public who live or own property in the surrounding area of the proposed remediation described in the draft CAP. Public comments on the proposed remediation will be accepted for a 30-day period.
 5. **Groundwater Monitoring Well Installation Work Plan:** The prevalent direction of the groundwater gradient appears to be towards the south and soil and grab groundwater samples collected along 13th Avenue indicate off-site and downgradient impact across 13th Avenue towards the Fire Station. The ACDEH-approved 2008 Work Plan included the installation of two monitoring wells downgradient and adjacent to the Fire Station, but the wells were not installed. A grab groundwater sample collected in September 2017 from soil boring SB-14B located downgradient, off-site, and adjacent to the Fire Station detected 3,700 micrograms per liter (ug/L) TPH as gasoline (TPHg) and 9,300 TPH as Diesel (TPHd) indicating off-site plume migration. Additionally, the laboratory analytical report for SB-14B groundwater sample included an analytical comment “e11, pattern resembles Stoddard solvent/mineral spirit.” During the November 2017 semi-annual groundwater event, the groundwater sample collected from well MW-2 similarly included an analytical comment “e11, pattern resembles Stoddard solvent/mineral spirit and “e4”, gasoline range compounds are significant”. Please include a work plan to install, develop, and sample on a semi-annual sampling basis a groundwater monitoring well downgradient and off-site with the draft Revised CAP. Please include waste disposal documentation describing characterization and disposal of investigation-derived soil and groundwater waste with the Report requested below.
- B. Semi-Annual Groundwater Monitoring and Sampling Events:** Please continue semiannual groundwater monitoring and sampling events until otherwise directed by ACDEH. As discussed during the JET call, groundwater samples collected from MW-1 and MW-7 should be analyzed for full scan semi-volatile organic compounds (SVOCs) and volatile organic compounds (VOCs) due to the location

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of the two wells directly downgradient of the former waste oil UST. Please incorporate the new well into the semi-annual monitoring and sampling events. Please include documentation describing characterization and disposal of groundwater sampling waste with the Reports requested below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule and send an e-mail with the report attached to: karel.detterman@acgov.org:

- **August 23, 2018:** Semiannual Groundwater Monitoring and Sampling Report, 2nd Half 2018 for July 12, 2018 Event
File to be named: RO159_GWM _R_yyyy-mm-dd
- **September 21, 2018:** Draft Revised Corrective Action Plan and Updated SCM
File to be named: RO159_DRAFT_CAP_SCM_R_yyyy-mm-dd
- **February 24, 2019:** Semiannual Groundwater Monitoring and Sampling Report, 1st Half 2019 for January 2019 Event
File to be named: RO159_GWM _R_yyyy-mm-dd
- **August 23, 2019:** Semiannual Groundwater Monitoring and Sampling Report, 2nd Half 2019
(If needed) for July 12, 2019 Event
File to be named: RO159_GWM _R_yyyy-mm-dd
- **February 24, 2020:** Semiannual Groundwater Monitoring and Sampling Report, 1st Half 2020
(If needed) for January 2020 Event
File to be named: RO159_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.

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please send me an e-mail message at: karel.detterman@acgov.org or call me at (510) 567-6708.

Sincerely,

Karel Detterman, PG
Senior Hazardous Materials Specialist

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

cc: John Williamson, 1511 Wellington Street, Oakland, CA 94602-1751
Trent Weise, AEI Consultants, (Sent via E-mail to: tweise@aeiconsultants.com)
Jeremy Smith, AEI Consultants, (Sent via E-mail to: jasmith@aeiconsultants.com)
Wayne Hung, AEI Consultants, (Sent via E-mail to: whung@aeiconsultants.com)

Casey Satkowski, SWRCB, (Sent via E-mail to: Casey.Satkowski@Waterboards.ca.gov)
Caryl Sheehan, SWRCB, (Sent via E-mail to: Caryl.Sheehan@Waterboards.ca.gov)

Dilan Roe, ACDEH, (Sent via E-mail to: dilan.roe@acgov.org)
Karel Detterman, ACDEH, (Sent via E-mail to: karel.detterman@acgov.org)
Paresh Khatri, ACDEH, (Sent via E-mail to: paresh.khatri@acgov.org)
GeoTracker, eFile

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.