



October 12, 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

Dear Mr. Sumner:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case files for the above referenced site including the September 21, 2018 Draft *Revised Corrective Action Plan* (Draft Revised CAP) prepared and submitted on your behalf by AEI Consultants, Inc. (AEI). As requested in ACDEH's July 17, 2018 Directive Letter, the Draft Revised CAP included a Work Plan for the installation of one off-site down gradient groundwater monitoring well, MW-8, to assess downgradient impact across 13th Avenue towards the Fire Station.

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

TECHNICAL COMMENTS

A. Draft Revised Corrective Action Plan and Updated Site Conceptual Model:

ACDEH stated general concurrence in the July 17, 2018 Directive Letter with the locations of the two proposed excavations described in the September 18, 2015 *Draft Feasibility Study/Corrective Action Plan* (*draft FS/CAP*) submitted to ACDEH by e-mail:

1. Square-shaped area measuring 20-feet by 20-feet encompassing two former gasoline underground storage tank (USTs) and a pump island on the eastern portion of the property;
2. Rectangular-shaped area measuring 16-feet by 50-feet encompassing an area with elevated Total Petroleum Hydrocarbons (TPH) in soil and groundwater along the southern portion of the property.

ACDEH concurred with the two proposed excavation locations because the 20 feet by 20 feet excavation encompassed the two former USTs and the pump island and the 16 feet by 50 feet excavation encompassed the soil borings that detected elevated benzene in soil 10 to 12 feet bgs with the maximum benzene in SB-22 (MW-5) as documented in Table 1 and Attachment A, Figure 3, draft Revised CAP.

**Table 1: Benzene detections milligrams per kilogram (mg/kg) in
 Soil borings SW-NE along 13th Avenue**

Depth feet bgs	SG-3	SB-23 (MW-7)	SB-22 (MW-5)	SB-3	MW-2	SB-2	MW-6
5				0.048			
10-11	3.1	3.4	78	8.6	0.140	0.061	<0.2
15-16		7.3	1.4	8.5	0.036		
21		1.2					

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ACDEH suspects that benzene-impacted soil in the vicinity of MW-5 continues to be the source of sustained elevated dissolved benzene concentration in groundwater both on- and off-site. The proposed 15 feet by 12 feet excavation of the draft Revised CAP excludes the area shown to contain the maximum soil benzene detections; consequently, ACDEH does not approve the draft CAP until further definition is performed in the vicinity of MW-5 as described below.

Request for up to three additional soil borings: ACDEH requests installation of up to three soil borings at a reasonable distance around MW-5 to better define the extent of benzene-impacted soil to ensure successful corrective action.

Please e-mail a Draft Soil Boring Work Plan by the date provided below that is comprised of:

- i. A figure showing the proposed boring locations;
- ii. A description of the rationale for the boring placement;
- iii. Proposed soil and groundwater sampling methods and analytical methods;
- iv. Reference to Standard Operating Procedures for performance of soil borings.

TECHNICAL REPORT REQUEST

Please e-mail the draft Work Plan to my attention (karel.detterman@acgov.org)

- **October 26, 2018:** E-mailed draft Work Plan for Soil Borings

Approval of the Draft Soil Boring Work Plan and the MW-8 installation Work Plan will be provided under separate cover along with a request to upload the technical reports to the State Water Resources Control Board's Geotracker website, in accordance with the provided specified file naming convention and schedule.

This report is 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

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

Attachment A: Figure 3, Draft Revised CAP

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cc: John Williamson, 1511 Wellington Street, Oakland, CA 94602-1751

Trent Weise, AEI Consultants, (Sent via E-mail to: tweise@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>.

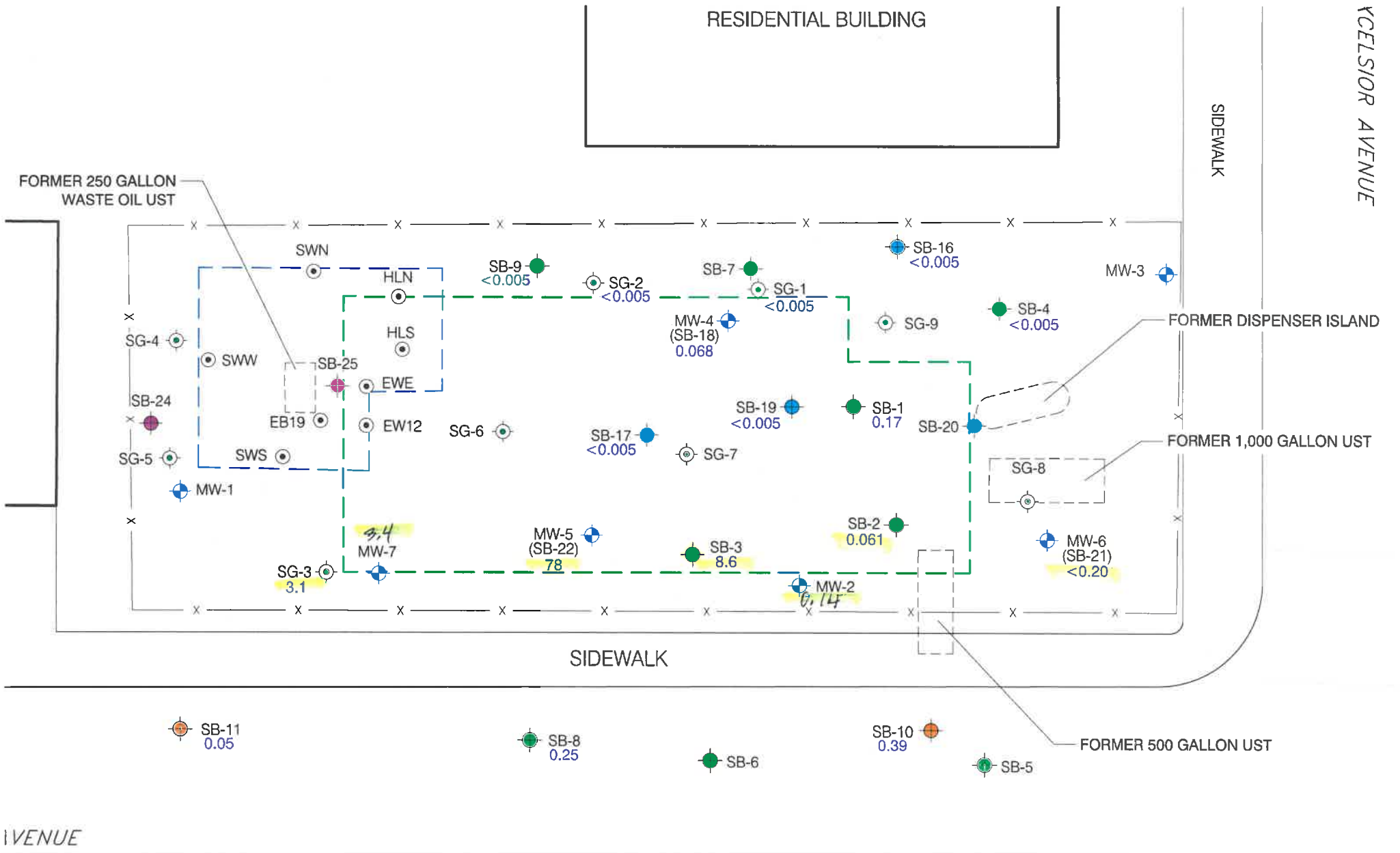
UNDERGROUND STORAGE TANK CLEANUP FUND

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.

ATTACHMENT A



Benzene Concentrations in Soil
9'-12' bgs

STOP

Enlargement from
Fig 3
draft CAP
9/21/2018

B SB-14

SB-13