



November 21, 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 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)
- September 21, 2018 *Draft Revised Corrective Action Plan* (draft Revised CAP) including the Proposed Groundwater Monitoring Well Installation Work Plan for MW-8
- October 26, 2018 *Soil Boring Work Plan* (Work Plan)

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.

ACDEH generally concurred with the locations of the two proposed excavations described in the draft *FS/CAP* consisting of:

- 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.

ACDEH concurred with the 16-feet by 50-feet proposed excavation because of the suspected benzene-impacted soil in the vicinity of MW-5 that continues to sustain elevated dissolved benzene concentration in groundwater. The location and size of the proposed 16-feet by 50-feet excavations had been changed in the draft Revised CAP. ACDEH is not in agreement with the change because the proposed excavation was not in the suspected benzene-impacted area in the vicinity of MW-5. In the October 12, 2018 Directive Letter, ACDEH requested the 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. AEI's *Soil Boring Work Plan* proposed the ten soil borings; consequently, as described below, ACDEH approves three specific locations of the proposed ten locations.

TECHNICAL COMMENTS

A. September 21, 2018 Draft Revised Corrective Action Plan Proposed Groundwater Monitoring Well Installation:

1. The proposed installation of MW-8 as described in the *draft Revised CAP* is approved for implementation **provided that all of the modifications specifically requested in the following technical comments are addressed and incorporated during the field implementation.** Submittal of a revised work plan or a work plan addendum is not required unless any alternate scope of work outside that described in the work plan or the technical comments are proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: karel.detterman@acgov.org) prior to the start of field activities.

Please include the report documenting the installation of MW-8, including the boring log, table summarizing soil sample results, well development and survey data, well construction diagram, and characterization and disposal of investigation-derived waste, with the Draft 2nd Revised CAP, Updated SCM, & Well Installation Report requested below.

2. Semi-Annual Groundwater Monitoring and Sampling Events:

- a. Please incorporate new well MW-8 into the semi-annual monitoring and sampling events.
- b. Please continue semiannual groundwater monitoring and sampling events until otherwise directed by ACDEH. As discussed during the June 27, 2018 JET call, please analyze groundwater samples collected from MW-1 and MW-8 only for both full scan volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs) due to the location of MW-1 and new MW-8 directly downgradient of the former waste oil UST.
- c. Please include documentation describing characterization and disposal of groundwater sampling waste with the appropriate report requested below.

B. October 26, 2018 Soil Boring Work Plan:

1. Three authorized soil borings:

- a. At this time, installation of soil borings SB-26 through SB-28 and SB-33 through SB-35 are **not authorized.**
- b. Please relocate proposed soil borings SB-30 and SB-31 (currently 3 feet from MW-5) to approximately 6 feet from MW-5 and move SB-32 approximately 6 feet southwest of MW-5. Soil boring SB-3, located nine feet east of MW-5, detected 8.6 mg/kg benzene and provides lateral extent of benzene for the fourth side.

The resulting locations of SB-30, SB-31, SB-32, and SB-3 are intended to provide the lateral and vertical extent of benzene around MW-5 and define the extent of the excavation around MW-5 in the four compass directions.

Using the same scale as shown in Attachment A, Figure 3, from the Draft Revised CAP, please e-mail a revised figure of the proposed locations of SB-30, SB-31, and SB-32 adjacent to MW-5 and SB-3 to karel.detterman@acgov.org by the date provided below. Upon approval of the figure, please include the figure with the draft Second Revised Corrective Action Plan and Updated SCM requested below.

2. Soil and Groundwater Sample Collection and Analysis:

- a. MW-5 has and will provide groundwater quality data in this location until such time as it is destroyed in preparation for excavation; consequently, groundwater sample collection and analysis **is not necessary** for approved borings SB-30, SB-31, or SB-32.
- b. Please collect **soil** samples from a depth between 0 to 5 feet, 5 to 10 feet, at 15 feet, and at 20 feet below ground surface (bgs), at the groundwater interface, lithologic changes, and in areas of obvious contamination in SB-30, SB-31, and SB-32. Please ensure that adequate soil samples are collected from each of the three soil borings to ensure vertical contaminant definition to inform the excavation depth around MW-5.
- c. Please analyze all soil samples for Total Petroleum Hydrocarbons as Gasoline (TPHg), TPH as Diesel (TPHd), full scan volatile organic compounds (VOCs) including naphthalene.
- d. Please include the boring logs for SB-30, SB-31, and SB-32 with the Draft 2nd Revised CAP, Updated SCM, & Well Installation Report requested below.

TECHNICAL REPORT REQUEST

Please e-mail a revised figure of the proposed locations of SB-30, SB-31, and SB-32 adjacent to MW-5 and SB-3 to karel.detterman@acgov.org by the date provided below:

- **December 14, 2018:** Revised figure of the proposed locations of SB-30, SB-31, and SB-32 adjacent to MW-5 and SB-3

Please upload the technical report to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention:

- **January 23, 2019:** Draft 2nd Revised CAP, Updated SCM, & Well Installation Report
File to be named: RO159_Draft 2nd CAP_SCM_R_yyyy-mm-dd
- **February 28, 2019:** Semiannual Groundwater Monitoring and Sampling Report, 1st Half 2019 for the January 2019 Event
File to be named: RO159_GWM_R_yyyy-mm-dd

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- **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 28, 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

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

Attachment A, Figure 3, from the Draft Revised CAP

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

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| 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

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| 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>.

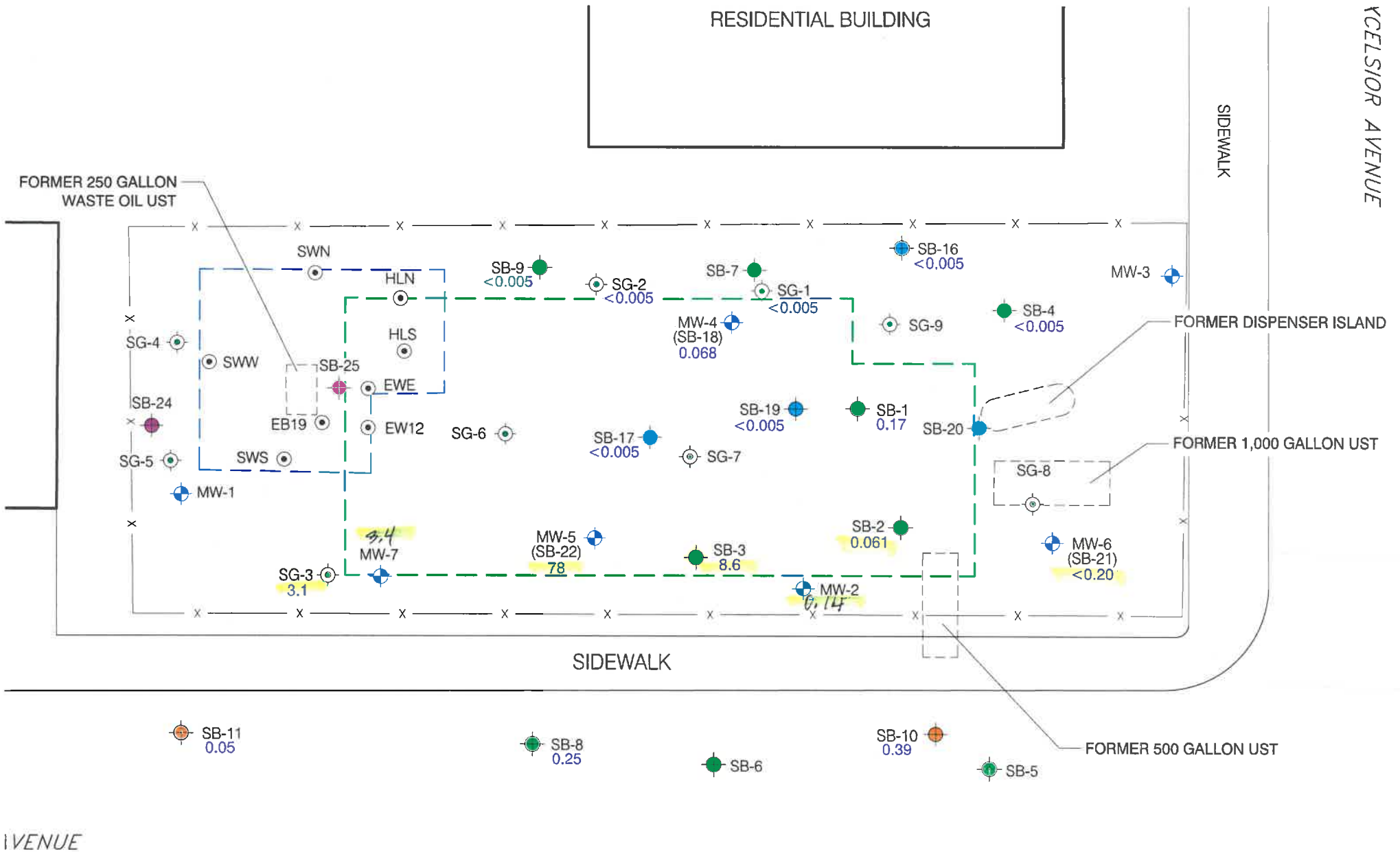
UNDERGROUND STORAGE TANK CLEANUP FUND

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