

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

COLLEEN CHAWA, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
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June 21, 2018

Lynn Worthington (Sent via E-mail to: caferealty@aol.com)
Golden Empire Properties
5942 Macarthur Boulevard, #B
Oakland, CA 94605

Subject : Well Retention and Monitoring at Fuel Leak Case No. RO0000271 and GeoTracker Global ID T0600100538, Exxon, 3055 35th Avenue, Oakland, CA 94619

Dear Mr. Worthington,

As you are aware, ACDEH approved destruction of soil vapor probes and groundwater monitoring and remediation wells in our correspondence dated June 13, 2018. While reviewing the case for site closure, Alameda County Department of Environmental Health (ACDEH) noted that information transmitted by Weber, Hayes and Associates (WHA) in their March 1, 2018 email to the JET members has not been uploaded to GeoTracker. This data presented groundwater and soil vapor data collected on February 7 and 8, 2018. Therefore, ACDEH reviewed the case file to ensure that the data was incorporated into the Site Conceptual Model to support case closure. Based on our review, it appears prudent to modify our directives on well destruction as described below.

In the JET meeting on March 7, 2018, the majority of the discussion during the meeting pertained to the disagreements regarding the Site Conceptual Model as it related to the transport of contaminants, upward contaminant migration through monitoring well screened intervals intersecting deeper and shallow water bearing zones, and collection of off-site soil, groundwater, and soil vapor data to evaluate human health risk to occupants of the adjacent residential neighborhood.

The agreed upon plan of action included collection of off-site soil, soil vapor, and shallow groundwater data at three properties located at 3006, 3014 and 3020 Bartlett Street to evaluate human health risk based on residual contamination. These three properties were identified as being located in the vicinity of documented free product migration as evidenced by concentrations of 41 milligrams per kilogram of benzene in a soil sample collected from boring B-16. JET members agreed to try to gain access to three properties, and if site access was not granted within 30 days, ACDEH would move forward with site closure based on existing data and would approve destruction of existing monitoring wells associated with the site (with the exception of upgradient wells MW-5 and MW-6, which potentially could be transferred to the upgradient Quik Stop site).

ACDEH sent certified letters to the property owners of 3006, 3014 and 3020 Bartlett, however, did not receive any responses and thus the risk to residents in the adjacent downgradient neighborhood remains a concern. Without off-site data documenting biodegradation of the contaminant plume, the documented elevated concentrations of benzene in onsite piezometer PZ-1B of 20,000 and 26,000 micrograms per liter (ug/L) collected in February 2018 demonstrates that biodegradation has not reduced concentrations in the shallow water bearing zone. Piezometer PZ-1B is screened in the 17-to 20-foot interval, the groundwater concentrations, and the visual, olfactory, and photoionization detector (PID) readings, presented in the boring logs support the hypothesis that shallow groundwater impacts may have occurred at the site. The current concentrations in piezometers PZ-1B are significantly higher than concentrations observed in monitoring wells screened across both shallow and deep water bearing zones and therefore indicate that upward migration may not be the source of the shallow groundwater contaminant concentrations detected in the piezometers. Consequently, it appears appropriate to destroy the monitoring wells that are screened between two water bearing zones, while retaining the shallow piezometers for further monitoring to evaluate the impacts to the shallow water bearing zone, without bias from the deeper water bearing zone.

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Lastly, the soil vapor analytical data collected in February 2018 documents the presence of tetrachloroethylene (PCE) in soil vapor, both on and off-site. In WHA's email, transmitting the data, they state that the presence of PCE in vapor probes SV-10, SG-17, SG-19 is unusual and unexplained and note the relative disparate locations of the probes and the absence of PCE in previous soil gas samples. WHA concludes that PCE concentrations do not alter the status of the case. A review of ACDEH's case file notes indicates that the PCE results were not discussed during the March 7, 2018 JET as also indicated by JET meeting notes prepared by the State.

ACDEH does not agree with WHA that the PCE detections do not alter the status of the case, as sufficient data is not available to derive that conclusion. PCE has been detected in soil gas samples at the upgradient site at maximum concentrations of 310 µg/L in 2017. Site investigation activities at that site were conducted to evaluate whether an onsite PCE source exists. However, PCE was not detected in soil or groundwater at that site. Therefore, the source has not been identified. A similar investigation needs to be conducted at your site to evaluate whether there is an onsite source of PCE detected in soil vapor at the site vicinity from historic land uses, including, but not limited to the former waste oil UST. Site boring logs and contaminant detection locations indicate that contaminant transport at and in the vicinity of the site may be along preferential pathways such as sand stringers or buried stream channels. Peralta Creek is located approximately 500 feet northwest of the site, increasing the likelihood of such preferential pathways for contaminant migration. Therefore, at this juncture, ACDEH requests the following:

- Retain the piezometers and conduct periodic monitoring to evaluate shallow groundwater conditions;
- Collect groundwater samples from monitoring wells MW-1, MW-3 and RW-8 and off-site well MW-6 and analyze for VOCs (full scan) by EPA test method 8260 to evaluate whether the site is a potential source of chlorinated hydrocarbons in soil gas, prior to well destruction. Based on groundwater sample analytical results, retain well(s) if warranted;
- Collect additional soil vapor samples from on-site soil gas probes SV-2, SV-3, SG-17 & SG-18 during dry season conditions to reduce the probability of flooded probes.

The data collected along with the February 2018 data must be incorporated in the Site Conceptual Model to support site closure. To that end, ACDEH requests submittal a technical report addressing the above-mentioned concerns by **August 20, 2018**.

Prior to case closure consideration, please ensure the case is GeoTracker compliant and all submittals have been uploaded. ACDEH notes that EDF data for the February 2018 soil gas and groundwater data has not been uploaded to GeoTracker. Upon upload completion, please submit a listing of the uploaded documents via electronic mail, Attention: Keith Nowell, by **July 29, 2018**. Thank you for your cooperation. ACDEH looks forward to working with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 777- 2478 or send an electronic mail message at paresh.khatri@acgov.org.

Sincerely,

Paresh C. Khatri
Supervising Hazardous Materials Specialist
Local Oversight & Site Cleanup Programs

cc: Pat Hoban (Sent via E-mail to: pat@weber-hayes.com)
Craig Drizin (Sent via E-mail to: craig@weber-hayes.com)
Harrison Hucks (Sent via E-mail to: harrison@weber-hayes.com)
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Dilan Roe, ACDEH, (*Sent via electronic mail to: dilan.roe@acgov.org*)

Paresh Khatri, ACDEH, (*Sent via electronic mail to: paresh.khatri@acgov.org*)

Keith Nowell, ACDEH, (*Sent via electronic mail to: keith.nowell@acgov.org*)

Electronic File; GeoTracker

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.