



ENVIRONMENTAL HEALTH DEPARTMENT  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

April 29, 2011

Jennifer Sedlachek  
Exxon Mobil  
4096 Piedmont Avenue #194  
Piedmont, CA 94611  
(Sent via E-mail to: [jennifer.c.sedlachek@exxonmobil.com](mailto:jennifer.c.sedlachek@exxonmobil.com))

Victor and Lye Chu  
3915 Forest Hill Ave.  
Oakland, CA 94602

Mohammed Mashoon  
Mash Petroleum  
428 13<sup>th</sup> Street, 10<sup>th</sup> Floor  
Oakland, CA 94612  
(Sent via E-mail to: [mashpetroleum@yahoo.com](mailto:mashpetroleum@yahoo.com))

Subject: Work Plan Request for Fuel Leak Case No. RO0000491 and GeoTracker Global ID T0600100552, EXXON #7-3006, 720 High Street, Oakland, CA 94601

Dear Ms. Sedlachek and Messrs. Mashoon and Chu:

Thank you for the recently submitted document entitled *Site Assessment Report* dated October 19, 2009, which was prepared by Environmental Resolutions Inc., for the subject site. Alameda County Environmental Health (ACEH) staff has reviewed the case file including the above-mentioned report and has determined that additional work is needed to define the off-site extent of contamination.

Work to date has consisted of on-site investigation and remediation of floating product at the site. Remediation consisted of operation of an on-site air-sparg system from 1996 to 1999 and a biosparge system from 2001 to 2003. Confirmation borings were advanced in 2005. Off-site boring (CPT-2) had a detection of 1,060,000 micrograms per liter ( $\mu\text{g/L}$ ) total petroleum hydrocarbons as gasoline (TPHg) and over 1,380  $\mu\text{g/L}$  benzene in groundwater at 10 feet below ground surface (bgs). The investigation shows that although on-site remediation has been performed, significant off-site contamination is present and its extent is undefined. Additionally, sampling at the downgradient Ekotek site in 2010 detected hydrocarbons at concentrations of 46,000  $\mu\text{g/L}$  TPHg and 58,000  $\mu\text{g/L}$  TPHd that potentially originate from your site. Therefore, an investigation as to the off-site extent of petroleum hydrocarbons is needed.

ACEH requests that you address the following technical comments and send us the report requested below.

### **TECHNICAL COMMENTS**

1. **Off-Site Petroleum Hydrocarbons** – Previous work performed by Exxon-Mobil off-site indicates that petroleum hydrocarbons are present in free-product range. As discussed above, groundwater concentrations from samples collected in boring CPT-2 indicate TPHg was detected at 1,060,000 parts per billion (ppb) and benzene at 1,380 ppb. ACEH approved a work plan to investigate this contamination on August 5, 2008. However, the wells have yet to be installed due to Caltrans restrictions for work during the High Street project.

In 2009, East Bay Municipal Utility District was required to move a sewer line downgradient of the Exxon/Mobil site for the Caltrans High Street project. Petroleum hydrocarbons were encountered and the Regional Water Quality Control Board required the Ekotek Lube site at 4200 Alameda Avenue, Oakland, CA to advance soil borings south of Highway 880 to investigate the petroleum hydrocarbons. The results from boring SB-8 revealed 46,000 µg/L TPHg and 58,000 µg/L TPHd. This boring is downgradient of the Exxon/Mobil site and from the free product which was detected in CPT-2. The chromatogram suggests that these hydrocarbons differ from the constituents detected at the Ekotek site, indicating Ekotek is not the source. Therefore, additional investigation is needed in this area to determine the downgradient extent of the petroleum hydrocarbons originating from the Exxon/Mobil site. Please prepare a work plan to evaluate the extent of contamination downgradient of your site by the due date requested below.

2. **Contaminant Source Area Characterization** – On-site petroleum hydrocarbons remain near the former waste-oil tank at concentrations of up to 3,100 mg/kg TPHg and 1,338 mg/kg TPHd. Groundwater concentrations remain elevated in this area (MW-7) and had increased before the well was destroyed in 2000 and no remediation was performed here. Also no apparent volatile organic analysis was performed adjacent to the waste oil UST and no vapor survey has been performed at the site. Please address these aspects in the work plan requested below.
3. **Groundwater Contaminant Plume Monitoring** – Please reduce groundwater monitoring to semi-annual for all site wells and report on a semi-annual basis.

### **TECHNICAL REPORT REQUEST**

Please submit technical reports to ACEH (Attention: Barbara Jakub), according to the following schedule:

- **July 15, 2011** – Soil and Water Investigation Work Plan
- **July 31, 2011** – Semi-annual Monitoring Report (2nd Quarter 2011)
- **December 30, 2011** – Semi-annual Monitoring Report (4th Quarter 2012)

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Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 639-1287 or send me an electronic mail message at [barbara.jakub@acgov.org](mailto:barbara.jakub@acgov.org).

Sincerely,

Barbara J. Jakub, P.G.  
Hazardous Materials Specialist

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

cc: Paula Sime, Environmental Resolutions, Inc., 601 North McDowell Blvd.Petaluma, CA 94954 (*Sent via E-mail to: [psime@ERI-US.com](mailto:psime@ERI-US.com)*)  
Mansour Sepehr, Ph.D., P.E., SOMA Environmental Engineering, Incorporated, 6620 Owens Drive, Suite A, Pleasanton, California 94588 (*Sent via E-mail to: [msepehr@somaenv.com](mailto:msepehr@somaenv.com)*)  
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (*Sent via E-mail to: [lgriffin@oaklandnet.com](mailto:lgriffin@oaklandnet.com)*)  
Donna Drogos, ACEH (*Sent via E-mail to: [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org)*)  
Barbara Jakub, ACEH (*Sent via E-mail to: [barbara.jakub@acgov.org](mailto:barbara.jakub@acgov.org)*)  
GeoTracker, e-file

## 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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) 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 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 Spills, Leaks, Investigations, and Cleanup (SLIC) 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 for more information on these requirements ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)).

### PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH 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, later 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.

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|---|--|
| <b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b> | <b>REVISION DATE:</b> July 20, 2010  |
|   | <b>ISSUE DATE:</b> July 5, 2005  |
|   | <b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010 |
| <b>SECTION:</b> Miscellaneous Administrative Topics & Procedures              | <b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions                                  |

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) 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](mailto: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) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
    - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site.
  - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
  - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - e) 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](mailto: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.