



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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July 7, 2014

Ms. Jennifer Sedlachek  
ExxonMobil  
4096 Piedmont Ave., #194  
Oakland, CA 94611

(Sent via E-mail to:

[jennifer.c.sedlachek@exxonmobil.com](mailto:jennifer.c.sedlachek@exxonmobil.com))

Mrs. Muriel Blank  
Blank Family Trust  
1164 Solano Ave., #406  
Albany, CA 94706

Subject: Request for a Work Plan; Fuel Leak Case No. RO0002974 and GeoTracker Global ID T0619716673, Exxon, 990 San Pablo Ave., Albany, CA 94706

Dear Ms. Sedlachek and Mrs. Blank:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Soil, Soil Vapor, and Groundwater Investigation Report and Site Conceptual Model*, dated May 2, 2014, which was prepared and submitted on your behalf by Cardno ERI (Cardno) for the subject site. The report recommended work to address identified data gaps including the offsite monitoring of groundwater by the installation of two wells, and evaluation of seasonal soil vapor concentrations beneath the site to evaluate the risk of vapor intrusion at the site. In general, ACEH is in agreement with the proposed work; however, discusses differences in the sections below.

ACEH has previously evaluated the data and recommendations presented in the above-mentioned reports, in conjunction with the case files, to determine if the site is eligible for closure as a low risk site under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on the recent investigation and ACEH staff review, we have revised the checklist and have determined that the site fails to meet the Media-Specific Criteria for Groundwater and the Media-Specific Criteria for Vapor Intrusion to Indoor Air (see Geotracker for an updated copy).

Based on the review of the case file ACEH requests that you address the following technical comments and send us the documents requested below.

#### **TECHNICAL COMMENTS**

1. **Request for a Work Plan** – ACEH requests the submittal of a work plan by the date referenced below.
  - a. **Groundwater Delineation** - The downgradient extent of the dissolved-phased groundwater plume remains undefined. It is appropriate to monitor the extent the offsite migration of the dissolved-phased plume to the south of the site utilizes the sanitary sewer installed at an approximate depth of 12.7 feet below grade surface (bgs) beneath Buchanan Street. The proposed installation of a well near bore B12 appears warranted. A second well was proposed to be installed near soil bore B8 to monitor the terminal end of the plume; however, ACEH requests that the well be placed near bore B9 due to the apparent split in the plume migration suggested by very low to trace grab groundwater sample concentrations collected from bores B8 and B10, and higher concentrations detected at soil bore B9 downgradient of offsite residential homes.

- b. Seasonal Soil Vapor Evaluation** – The referenced report also recommended seasonal soil vapor sampling. As communicated in previous directive letters ACEH is in agreement with this recommendation; however, ACEH requests the inclusion of Halogenated Volatile Organic Compounds (HVOCs) due to the documented, but unknown location, of a former waste oil underground storage tank (UST) at the site, and the detection of exceptionally high photoionization detector (PID) results in wells MW-3 and MW-4, and high results in MW-2, without the detection of significant petroleum hydrocarbon volatiles in soil samples collected at the time of well installation. The presence of sandy soils may also contribute to the generation of a subsurface vapor cloud; however, it is appropriate to verify that chlorinated solvents related to the former waste oil UST are not a part of this vapor.

An evaluation of the foundation of the building at the subject site, or of the immediately downgradient adjacent residential homes was not included in the referenced report. The September 17, 2013 directive letter requested the evaluation of the onsite and offsite residential buildings prior to installation of vapor wells at the site. Based on a review of the residential homes on Google Earth Street View, it appears that one residential foundation may be partially below grade. This may effectively reduce the minimum five foot separation distance allowed by one LTCP vapor intrusion scenario, but also affects the appropriateness of the vapor well installation depth under the LTCP (required to be five feet below building foundations). ACEH requests a review of these foundations be undertaken, and a discussion of the depth of the existing vapor wells relative to the foundations be provided by the date requested below.

- 2. Draft Feasibility Study / Corrective Action Plan** – ACEH's evaluation of the vapor well results indicates that the site does not satisfy the LTCP Petroleum Vapor Intrusion to Indoor Air criterion. Based on ACEH's analysis, three of four vapor samples contained oxygen less than 4% oxygen, benzene concentrations in groundwater beneath the site were recently as high as 590 micrograms per liter ( $\mu\text{g/l}$ ), and the bioattenuation zone at the site appears to be approximately 6 feet (greater than 5 feet, but less than 10 feet). This combination of site characteristics eliminates each available scenario within the LTCP Vapor Intrusion to Indoor Air criteria.

At this time, a Draft Feasibility Study / Corrective Action Plan (FS/CAP) prepared in accordance with Title 23, California Code of Regulations, Section 2725 appears warranted. The FS/CAP must include a concise background of soil and groundwater investigations performed in connection with this case and an assessment of the residual impacts of the chemicals of concern (COCs) for the site and the surrounding area where the unauthorized release has migrated or may migrate. The FS/CAP should also include, but is not limited to, a detailed description of site lithology, including soil permeability, and most importantly, contamination cleanup levels and LTCP appropriate cleanup goals in accordance with the San Francisco Regional Water Quality Control Board (SFRWQCB) Basin Plan. Should other non-petroleum contaminants be documented, other non-LTCP cleanup goals may be required, such as San Francisco Bay Regional Water Quality Control Board (RWQCB) Environmental Screening Levels (ESL) guidance for all COCs, or other generated site-specific risk-based goals. Please note that soil cleanup levels should ultimately (within a reasonable timeframe) achieve water quality objectives (cleanup goals) for groundwater in accordance with the SFRWQCB Basin Plan. Please specify appropriate cleanup levels and cleanup goals in accordance with 23 CCR Section 2725, 2726, and 2727 in the CAP.

The CAP must evaluate at least three viable alternatives for remedying or mitigating the actual or potential adverse affects of the unauthorized release(s) besides the 'no action' and 'monitored natural attenuation' remedial alternatives. Each alternative shall be evaluated not only for cost-effectiveness but also its timeframe to reach cleanup levels and cleanup goals, and ultimately the Responsible Party must propose the most cost-effective corrective action. Please submit the Draft FS/CAP by the date identified below.

- 3. Groundwater Monitoring** – Please continue semi-annual groundwater monitoring in accordance with the approved groundwater monitoring plan for the site and submit groundwater monitoring report in accordance with the schedule below. For the reason discussed above for vapor, please also include analysis for HVOCs on a one time basis. The appropriateness of additional HVOC sampling is requested to be evaluated thereafter.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACEH ftp site (Attention: Barbara Jakub), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **July 25, 2014** – Semi-Annual Groundwater Monitoring Report  
File to be named: RO2974\_GWM\_R\_YYYY-MM-DD
- **September 5, 2014** – Data Gap Investigation Work Plan and Foundation Analysis  
File to be named: RO2974\_WP\_R\_YYYY-MM-DD
- **September 19, 2014** – Draft Feasibility Study / Corrective Action Plan  
File to be named: RO2974\_DRAFT\_FEASSTUD\_R\_YYYY-MM-DD
- **60 Days After Work Plan Addendum Approval** – Site Investigation Report  
File to be named: RO2974\_SWI\_R\_YYYY-MM-DD
- **December 5, 2014** – Semi-Annual Groundwater Monitoring Report  
File to be named: RO2974\_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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address does not appear on the cover page of this notification, ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Thank you for your cooperation. If you have any questions, please call me at (510) 567-6876 or send me an electronic mail message at [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org).

Sincerely,

Mark E. Detterman, PG, CEG  
Senior Hazardous Materials Specialist

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

cc: Rebekah Westrup, Environmental Resolutions, Inc., 601 North McDowell Blvd., Petaluma, CA 94954 (Sent via E-mail to: [rebekah.westrup@cardno.com](mailto:rebekah.westrup@cardno.com))

Mrs. Marcia B. Kelly, 641 SW Morningside Rd., Topeka, KS 66615 (Sent via E-mail to: [marciakelly@earthlink.net](mailto:marciakelly@earthlink.net))

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Rev. Deborah Blank, 1563 Solano Ave. #344, Berkeley, CA 94707 (Sent via E-mail to: [miracoli@earthlink.net](mailto:miracoli@earthlink.net))

Dilan Roe, ACEH (Sent via E-mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))

Mark Detterman, ACEH (sent via electronic mail to [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))

GeoTracker, file

## Attachment 1

### 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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> May 15, 2014
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 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 as they are NOT being supported at this time.
  - 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.