



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

July 10, 2015

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

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

(Sent via E-mail to:

jennifer.c.sedlachek@exxonmobil.com)

Subject: Conditional Approval of Remedial Design Implementation Plan and Data Gap Investigation Work Plan; Fuel Leak Case No. RO0002974 and GeoTracker Global ID T0619716673, Exxon, 990 San Pablo Ave., Albany, CA 94706

Dear Ms. Sedlachek and Ms. Blank:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including the *Remedial Design Implementation Plan and Data Gap Investigation Work Plan*, dated May 15, 2015, and the Draft Public Comment Fact Sheet, dated April 2015. The documents were prepared and submitted on your behalf by Cardno.

The FS/CAP proposes the installation of a High Intensity, Targeted (HIT) Dual Phase Extraction (DPE) system, using mobile remediation equipment, at the site. The mobile system is proposed to operate for periods of 5 to 30 days, but has the flexibility to extend the periods of operation depending on site specifics, such as contaminant extraction rates. The system is proposed to be operated at the site on a semi-annual basis in the 1st and 3rd quarters of a year, and groundwater monitoring is proposed to occur in the 2nd and 4th quarters to allow groundwater concentration stabilization in the interim period of time. Included in the system is the installation of four extraction wells, and the installation of one new groundwater monitoring well, to monitor groundwater concentrations in a downgradient location not currently monitored. The estimated period of time required for the proposed system to operate at the site is anticipated to be three years on the proposed schedule. Please be aware that the Low Threat Closure Policy (LTCP) generally expects that secondary source removal to occur within one year. This may require modifications to the approach to accelerate the rate of removal.

Based on ACEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is 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: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Data Gap Investigation Work Plan Approval** – The referenced work plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests a modification to the approach. Please submit a report by the date specified below.
 - a. **Subsurface Clearance Protocols** – Please ensure that all soil bores are cleared using hand augering, or other, non-biasing clearance techniques. The use of an air knife will low-bias soil analytical results.

- b. Soil Sample Selection** – Please ensure soil samples are collected and submitted for laboratory analysis from each groundwater and vapor well, based on indications of contamination (PID results, staining, olfactory, etc.) and at significant changes in lithology, within the 0 to 5 and the 5 to 10 foot depth intervals, as appropriate, as required by the Low Threat Closure Policy (LTCP).
 - c. Laboratory Analysis** - Please ensure soil, groundwater, and vapor sample analysis includes naphthalene, consistent with the LTCP. Please also ensure that, a minimum of one time, vapor samples include chlorinated volatile organic compounds (VOCs) due to the detection of several of these compounds at the site. The need for inclusion of the chlorinated VOC analytical suite can be revisited upon confirmation that these compounds are not in vapor collected at the site.
- 2. Corrective Action Plan Approval** – The referenced corrective action plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests the following. Please submit reports as outlined below.
 - a. Remedial Progress Reporting** – Due to the planned corrective action time period of up to three years, monthly Remedial Progress Reports (RPR) are requested, by the dates identified below. These are intended to monitor site progress and DPE system effectiveness. These can be included in groundwater monitoring reports, when appropriate. Please copy ACEH on system discharge reports to the POTW and the BAAQMD.
 - b. Groundwater Monitoring** – Semi-annual groundwater monitoring during corrective action activities is an acceptable interval with the monthly submittal of RPRs as requested above.
 - c. Public Participation Notification** – The proposed scope of work to perform HIT DPE is acceptable for public comment at this time. Therefore, we request that you distribute the revised Fact Sheet to the mailing list (Attachment 2). Following distribution of the Fact Sheet, please provide your personal certification by e-mail or letter, that the Fact Sheet was distributed by U.S. Mail to the attached mailing list no later than July 17, 2015.

At the end of the 30-day public comment period, ACEH requests the submittal of a document that addresses any comments received from the public. If no public comments are received, ACEH can approve implementation of the DPE.

TECHNICAL REPORT REQUEST

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

- **July 17, 2015** – Send out Fact Sheet
- **July 31, 2015** – Certification of Fact Sheet Distribution
File to be named: RO2974_CAP_PPRP_CERT_L_yyyy-mm-dd
- **August 17, 2015** – Public Comment Period Ends
- **August 21, 2015** – Email Notification of Public Comments Received
- **60 Days After Groundwater and Vapor Well Installation** – First Monthly DPE System Remedial Progress Report; File to be named: RO2974_REM_R_yyyy-mm-dd
- **December 18, 2015** – Fourth Quarter 2015 Semi-Annual Groundwater Monitoring Report
File to be named: RO2974_GWM_R_yyyy-mm-dd
- **TBD** – Monthly DPE System Remedial Progress Reports
File to be named: RO2974_GWM_R_yyyy-mm-dd

Ms. Sedlachek and Mrs. Blank
RO0002974
July 10, 2015, Page 3

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.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

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

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

Attachment 2 – Public Notification Fact Sheet on Remedial Actions and Mailing List

cc: Greg Gurss, Cardno ERI, 601 North McDowell Blvd., Petaluma, CA 94954 (Sent via E-mail to: greg.gurss@cardno.com)

David Daniels, Cardno ERI, 601 North McDowell Blvd., Petaluma, CA 94954 (Sent via E-mail to: david.daniels@cardno.com)

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

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

Dilan Roe (sent via electronic mail to dilan.roe@acgov.org)

Mark Detterman (sent via electronic mail to mark.detterman@acgov.org)

Electronic File, GeoTracker

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/).

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: 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
 - 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 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.

ATTACHMENT 2
PUBLIC NOTIFICATION
FACT SHEET ON REMEDIAL ACTIONS
AND
MAILING LIST



FACT SHEET ON CORRECTIVE ACTION PLAN

Exxon #79374

990 San Pablo Avenue, Albany, CA 94706

Fuel Leak Case No. RO0002974 and

GeoTracker Global ID T0619716673

Site Remediation Summary

This fact sheet has been prepared to inform community members and other interested stakeholders regarding the status of a proposed soil, groundwater, and soil vapor cleanup at the former Exxon Service Station located at 990 San Pablo Avenue, Albany, California. Alameda County Environmental Health (ACEH) is the lead agency overseeing the site investigation and cleanup at the location, while ExxonMobil is the lead responsible party for the fuel leak case. ExxonMobil's consultant, Cardno, Inc, has proposed Periodic High Intensity Targeted (HIT) Dual Phase Extraction (DPE) as the appropriate remediation technology to clean up the site.

Site Background

The site is located on the northwest corner of San Pablo Boulevard at Buchanan Street in Albany. The site is currently a retail store for paint and painting products. Surrounding properties are a mix of residential and commercial use. A service station formerly occupied the site and the underground storage tanks (USTs) were removed in 1983. At that time four gasoline USTs and one waste oil UST were removed from the property.

Since 2008, investigations including the installation of soil borings, groundwater monitoring wells, and soil vapor wells have been performed. During the ongoing investigation, concentrations of fuel constituents have been reported in soil, groundwater, and soil vapor. The current maximum concentrations are primarily located in the southwestern portion of the site.

Proposed Cleanup Actions

Periodic HIT DPE has been selected as the most appropriate corrective action for the site. Three existing soil vapor extraction wells (SVE1 to SVE3) have been proposed to be augmented by the addition of four additional wells (SVE4 through SVE7) at the site, followed by the performance of short-term vapor extraction events using mobile extraction and abatement equipment to extract soil vapor and / or groundwater from the site. Vapor extraction is a remedial method that uses a vacuum to remove vapor-phase and residual hydrocarbons absorbed on soil from the subsurface through the wells. Depending on the site conditions, groundwater may be extracted as well. The mobility of the system allows varying SVE wells to be selectively targeted, based on changing site conditions and extraction and recovery rates. Prior to discharge, soil vapor will be treated to eliminate hydrocarbon vapor concentrations above allowed air discharge limits set by the Bay Area Air Quality Management District

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(BAAQMD). Multiple analytical samples will be collected to verify these limits have been met. Additionally, prior to discharge, extracted groundwater will also be treated to remove contamination above allowed discharge limits set by the local sanitary sewer district. Multiple analytical samples will also be collected of the water prior to discharge to verify the limits have been met. Reports will be submitted to document these findings.

Depending on the vapor and / or groundwater extraction rates obtained at the site, corrective actions may require up to three years to achieve the selected goals. The HIT DPE is expected to be discontinuous over this estimated period of time in order to allow groundwater to re-equilibrate with any residual contamination in soil.

During this time semi-annual groundwater and soil vapor monitoring will be performed to assess the effectiveness of the corrective action and the need for additional extraction events.

Next Step

ExxonMobil is working with ACEH to implement a soil, groundwater, and soil vapor cleanup at the site. The proposed corrective action alternative is described in the reports *Feasibility Study/Corrective Action Plan (FS/CAP)*, dated February 14, 2015, and the *Remedial Design Implementation Plan and Data Gap Investigation Work Plan*, dated May 15, 2015, prepared by Cardno, Inc. on behalf of ExxonMobil. The public is invited to review and comment on the proposed cleanup action. The reports are available on ACEH's website (<http://www.acgov.org/aceh/lop/ust.htm>) or the State Water Resources Control Board's GeoTracker website (<http://www.geotracker.waterboards.ca.gov/>).

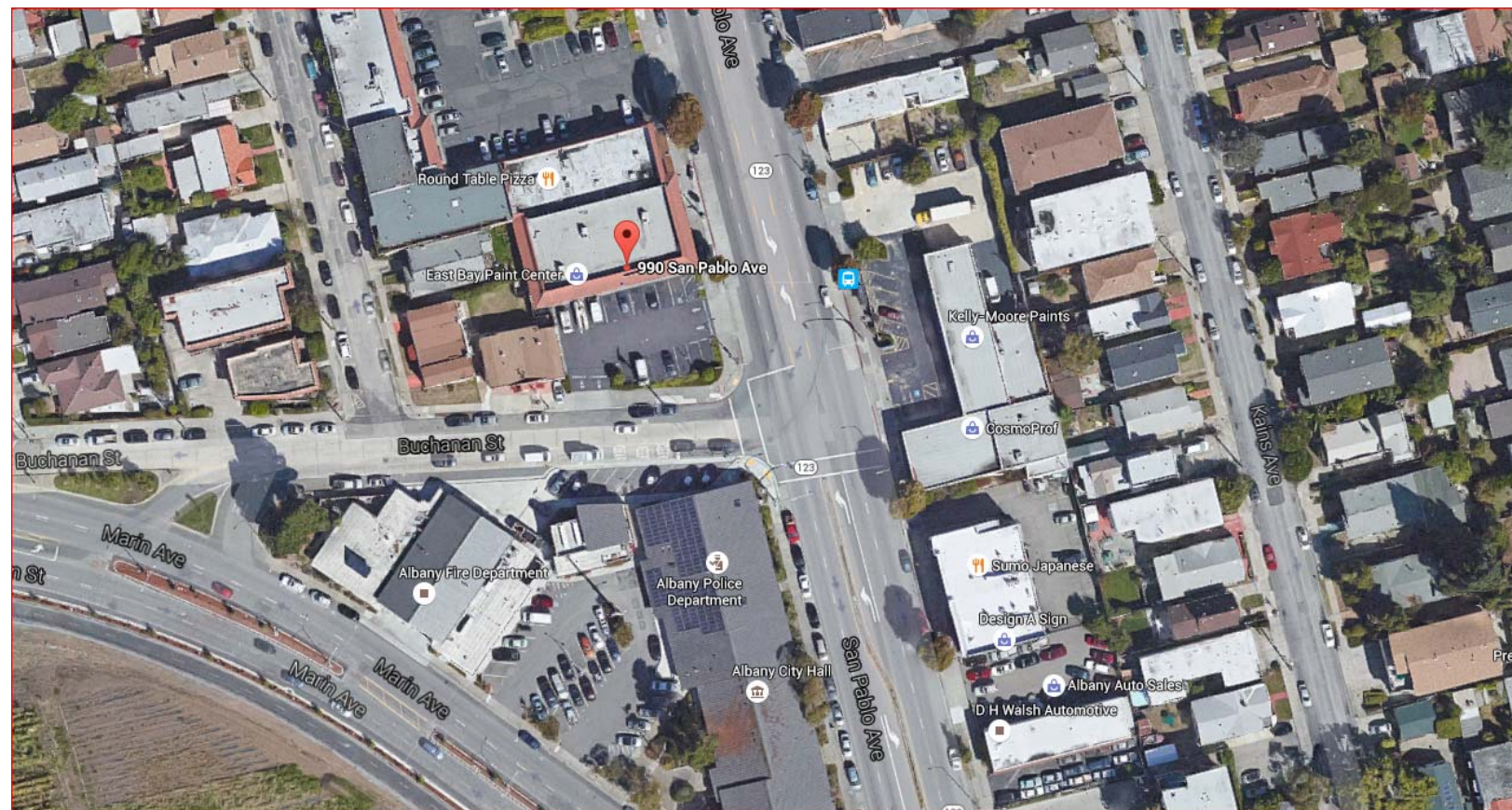
Please send written comments regarding the corrective action to Mark Detterman at the address below. All written comments received by **August 18, 2015** will be forwarded to the Responsible Party and will be considered and responded to prior to a final determination on the proposed cleanup.

For Additional information, please contact:

Mark Detterman
ACEH
1131 Harbor Bay Parkway
Alameda, CA 94502
Phone: 510-567-6876
E-mail:
mark.detterman@acgov.org

David Daniels
Cardno, Inc.
601 North McDowell Blvd.
Petaluma, CA 94954
Phone: 707-766-2024
E-mail: david.daniels@cardno.com

Aerial View of Property (Google Earth, 2015)



BECKHUSEN LEE
PARCEL #: 66-2722-29
910 FILLMORE ST
ALBANY CA 94706-1524

BLANK MURIEL T & AUSMAN D B & KELLY MA
PARCEL #: 66-2721-23-11
856 CARMEL AVE
ALBANY CA 94706-1812

CITY OF ALBANY PUBLIC FACILITIES FINANC
PARCEL #: 66-2692-2-2
1000 SAN PABLO AVE
ALBANY CA 94706-2226

COMMON AREA OF TR 5046 57 THRU 66
PARCEL #: 66-2722-67
975 ARLINGTON BLVD
EL CERRITO CA 94530-2703

GEE GORDON
PARCEL #: 65-2661-47
1594 PORTLAND AVE
BERKELEY CA 94707-1512

HOCHMAN ADAM B & BAUMER JENNIFER
PARCEL #: 66-2722-30-4
957 MADISON ST
ALBANY CA 94706-2024

KELLY MOORE PAINT CO
PARCEL #: 65-2661-43-3
987 COMMERCIAL ST
SAN CARLOS CA 94070-4018

KROEGER CLAUS F TR
PARCEL #: 65-2661-50
1328 MARIN AVE
ALBANY CA 94706-2131

LEVEQUE DUANE E & JANICE L TRS
PARCEL #: 66-2722-23
13600 SKYLINE BLVD
WOODSIDE CA 94062-4564

LINDERMAN R I & KUO BARBARA TRS
PARCEL #: 66-2722-24-1
P O BOX 112439
CAMPBELL CA 95011-2439

MAK MICHAEL & VUONGMAK JOANN ETAL
PARCEL #: 66-2721-12-1
P O BOX 6612
MORAGA CA 94570-6612

NG VICTOR Y TR
PARCEL #: 66-2722-30-3
825 HILLDALE AVE
BERKELEY CA 94708-1319

OCCUPANT
PARCEL #: 66-2721-23-11
990 SAN PABLO AVE
ALBANY CA 94706

OCCUPANT
PARCEL #: 66-2721-25-7
1043 BUCHANAN ST
ALBANY CA 94706

OCCUPANT
PARCEL #: 66-2721-26-6
950 SAN PABLO AVE
ALBANY CA 94706

OCCUPANT
PARCEL #: 65-2661-43-3
969 SAN PABLO AVE
ALBANY CA 94706

OCCUPANT
PARCEL #: 65-2661-43-2
953 SAN PABLO AVE
ALBANY CA 94706

OCCUPANT
PARCEL #: 65-2661-45-1
953 SAN PABLO AVE
ALBANY CA 94706

OCCUPANT
PARCEL #: 66-2722-67
970 ADAMS ST
ALBANY CA 94706

OCCUPANT
PARCEL #: 66-2722-24-1
962 ADAMS ST
ALBANY CA 94706

OCCUPANT
PARCEL #: 66-2722-23
954 ADAMS ST
ALBANY CA 94706

OCCUPANT
PARCEL #: 66-2722-29
959 MADISON ST
ALBANY CA 94706

OCCUPANT
PARCEL #: 66-2722-30-3
955 MADISON ST
ALBANY CA 94706

OCCUPANT
PARCEL #: 65-2661-46
949 SAN PABLO AVE
ALBANY CA 94706

OCCUPANT
PARCEL #: 65-2661-47
945 SAN PABLO AVE
ALBANY CA 94706

OCCUPANT
PARCEL #: 65-2661-38-1
979 SAN PABLO AVE
ALBANY CA 94706

OCCUPANT
PARCEL #: 65-2661-49-1
943 SAN PABLO AVE
ALBANY CA 94706

OCCUPANT
PARCEL #: 66-2721-12-1
938 SAN PABLO AVE
ALBANY CA 94706

OCCUPANT
PARCEL #: 65-2661-50
933 SAN PABLO AVE
ALBANY CA 94706

REYNOLDS BEVERLY D & RICHARD D
PARCEL #: 66-2722-28
963 MADISON ST
ALBANY CA 94706-2024

RITCHEY DEBORAH L & HASSLER TIMOTHY ,
PARCEL #: 66-2721-26-6
1029 SOLANO AVE #B
ALBANY CA 94706-1684

TABATABAEE AHMAD TR
PARCEL #: 65-2661-49-1
941 SAN PABLO AVE
ALBANY CA 94706-2009

TABATABAEE HASHEM TR
PARCEL #: 65-2661-38-1
1742 SOLANO AVE
BERKELEY CA 94707-2213

WU CALVIN
PARCEL #: 66-2721-25-7
901 HILLDALE AVE
BERKELEY CA 94708-1417

Z GRAND LLC
PARCEL #: 65-2661-43-2
150 GRAND AVE #201
OAKLAND CA 94612-3781

Z GRAND LLC
PARCEL #: 65-2661-45-1
150 GRAND AVE #201
OAKLAND CA 94612-3781

Z GRAND LLC
PARCEL #: 65-2661-46
150 GRAND AVE #201
OAKLAND CA 94612-3781

ZHENG WINNIE
PARCEL #: 66-2722-30-1
953 MADISON ST
ALBANY CA 94706-2024