



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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January 8, 2016

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))

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

Subject: Request for 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 *Data Gap Investigation, Well Installation, and Remedial Progress Report*, dated November 12, 2015, and the *Groundwater Monitoring and Remediation Status Report, Fourth Quarter 2015*, dated December 17, 2015. These reports were prepared and submitted on your behalf by Cardno. Thank you for submitting the reports.

Thank you also for initiating corrective actions at the site. As you are likely aware, the initial groundwater monitoring report subsequent to the initial High Intensity Targeted (HIT) event documents marked decreases in Total Petroleum Hydrocarbons as gasoline (TPHg) concentrations in groundwater.

ACEH has 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 data generated during recent investigation and ACEH staff review, we have revised the checklist. ACEH has determined that the site continues to fail 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), but the site may also fail General Criteria f (Secondary Source Removal). Technical comments relative to each of criteria are discussed below.

Therefore, 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. General Criteria f – Secondary Source Has Been Removed to the Extent Practicable –**  
“Secondary source” is defined as petroleum-impacted soil or groundwater located at or immediately beneath the point of release from the primary source. Unless site attributes prevent secondary source removal (e.g. physical or infrastructural constraints exist whose removal or relocation would be technically or economically infeasible), petroleum-release sites are required to undergo secondary source removal to the extent practicable as described in the policy. “To the extent practicable” means implementing a cost-effective corrective action which removes or destroys-in-place the most readily recoverable fraction of source-area mass. It is expected that most secondary mass removal efforts will be completed in one year or less. Following removal or destruction of the secondary source, additional removal or active remedial actions shall not be required by regulatory agencies unless (1) necessary to abate a demonstrated threat to human health or (2) the groundwater plume does not meet the definition of low threat as described in this policy.

Removal of the former fuel underground storage tanks (USTs) and the waste oil UST are reported to have occurred at in 1983. Based on available records it is not certain that over excavation beneath the USTs occurred at that time. Soil and groundwater characterization in the vicinity around, and beneath, the former UST locations have been conducted; however, the former tank holds have not been characterized and may contain residual contamination at concentrations of concern. The installation of bores to characterize shallower tank-hold materials can provide baseline tank-hold concentrations near the initiation of corrective actions.

Please present a strategy in a Data Gap Work Plan (described in Technical Comment 4 below) to address the items discussed above. Alternatively, please provide justification of why the site satisfies this general criterion in the focused SCM described in Technical Comment 4 below.

2. **LTCP Media Specific Criteria for Groundwater** – To satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites listed in the policy.

Our review of the case files indicates that insufficient data collection and analysis has been presented to support the requisite characteristics of plume stability or plume classification as follows:

- a. **Plume Areal Extent and Groundwater Gradient** – Over a period of time, and depending on the number of wells installed and the time of year, it appears that the groundwater gradient at the site is highly variable. At present the groundwater gradient is to the south-southeast, and the extent of the groundwater plume to the south of wells MW-2 and MW-7, especially towards the police station across Buchanan Street, has not been adequately defined. This concern is not limited to petroleum hydrocarbon concentrations, but also to undefined halogenated volatile organic compounds (HVOCs) south of MW-2. Tetrachlorethene (PCE) and Trichloroethene (TCE) were documented in well MW-1 and MW-2 at concentrations up to 92 micrograms per liter ( $\mu\text{g/l}$ ) and 79  $\mu\text{g/l}$  respectively, in the recent groundwater monitoring event. The concentration of PCE in both wells was analyzed after the holding period, thus the concentrations are likely to have been higher. Both concentrations are over the drinking water and the non-drinking water Environmental Screening Levels (ESLs) promulgated by the San Francisco Bay Regional Water Quality Control Board (RWQCB).

Please present a strategy in a Data Gap Work Plan (described in Technical Comment 4 below) to address the items discussed above. Alternatively, please provide justification of why the site satisfies the Media-Specific Criteria for Groundwater in the focused SCM described in Technical Comment 4 below.

3. **Risk of Indoor Air Vapor Intrusion** – Recent review of the site on Google Earth indicates that the elevation of the immediately adjacent periodically downgradient residential home to the west is approximately 1 to 2 feet lower than the onsite elevation. Google Earth also indicates that an enclosed garage is located within feet of the downgradient property line. It appears appropriate to determine the risk of vapor intrusion at the home, including the garage. Indoor air sampling of the garage may be biased high due to potential use of the garage as an actual garage; however, the use of the space has not been determined. Alternative methods to evaluate the garage and home are available, including sub-slab vapor sampling. The lower site elevation at the home effectively reduces a portion of the bioattenuation zone that may be available at the site.

Please present a strategy in a Data Gap Work Plan (described in Technical Comment 4 below) to address the items discussed above. Alternatively, please provide justification of why the site satisfies the Media-Specific Criteria for Vapor Intrusion in the focused SCM described in Technical Comment 4 below.

4. **Data Gap Investigation Work Plan and Focused Site Conceptual Model** – Please prepare a Data Gap Investigation Work Plan to address the technical comments listed above. Please support the scope of work in the Data Gap Investigation Work Plan with a focused SCM and Data Quality Objectives (DQOs) that relate the data collection to each LTCP criteria. For example please clarify which scenario within each Criterion a sampling strategy is intended to apply to.

In order to expedite review, ACEH requests the focused SCM be presented in a tabular format that highlights the major SCM elements and associated data gaps, which need to be addressed to progress the site to case closure under the LTCP.

5. **HVOC Analysis for Soil Vapor Extraction (SVE) Events** – Due to the presence of HVOCs in the eastern portion of the site, it is appropriate to include laboratory analysis for HVOCs in vapor extraction discharge monitoring and reporting. Please incorporate this sampling and reporting in the next regularly scheduled event.
6. **HIT System Reporting and BAAQMD Site Specific Permit** – Due to the intermittent nature of the planned HIT events, Cardno has recommended quarterly Remedial Progress Reports (RPR). At this time, the recommendation appears appropriate. Please submit reports by the dates identified below.  
  
Cardno additionally recommended that a site specific permit for remediation discharges to the atmosphere from the Bay Area Air Quality Management District (BAAQMD). This also appears appropriate. Please copy ACEH on system discharge reports to a POTW and to the BAAQMD.
7. **Groundwater Monitoring and Analytical Data** – In future groundwater monitoring reports please tabulate chlorinated solvents and other detected compounds under individual column headers. The intent is to quickly discern contaminant trends and not determine which footnote applies to which compound. Please continue to analyze for chlorinated solvents at the site in wells MW-1 and MW-2.

#### **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:

- **March 25, 2016** – Data Gap Investigation Work Plan  
File to be named: RO2974\_WP\_R\_yyyy-mm-dd
- **March 25, 2016** – Remedial Progress Report  
File to be named: RO2974\_REM\_R\_yyyy-mm-dd
- **July 15, 2016** – Second Quarter 2016 Semi-Annual Groundwater Monitoring and Remedial Progress Report; File to be named: RO2974\_GWM\_REM\_R\_yyyy-mm-dd
- **September 23, 2016** – Remedial Progress Report  
File to be named: RO2974\_REM\_R\_yyyy-mm-dd
- **60 Days After Work Plan Approval** – Site Investigation Report  
File to be named: RO2974\_SWI\_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.

ACEH appreciates work progress at the site and your cooperation. Should you have any questions, please contact 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

Ms. Sedlachek and Mrs. Blank  
RO0002974  
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Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations and  
Electronic Report Upload (ftp) Instructions

cc: Christine Capwell, Cardno, 601 North McDowell Blvd., Petaluma, CA 94954 (Sent via E-mail to:  
[christine.capwell@cardno.com](mailto:christine.capwell@cardno.com))

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

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

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

Dilan Roe (sent via electronic mail to [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))

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