

**ANIKO R. MOLNAR**  
**Environmental Consultant**

**MAR 25 2002**

March 18, 2001

Ms. Eva Chu  
Alameda Health Care Agency  
Department of Environmental Health  
1131 Harbor Bay Parkway, 2<sup>nd</sup> Floor  
Alameda, California 94502

RE: Request for Site Closure  
2801 MacArthur Blvd.  
Oakland, CA  
StID 23

Dear Ms. Chu:

The APA Fund has completed remediation at the above referenced site. As documented in a letter to you dated February 26, 2001, the remediation was conducted in accordance with the Corrective Action Plan (CAP) prepared by Subsurface Consultants, Inc. (SCI) dated August 13, 1999. The plan was approved in a letter dated August 20, 1999. However, before the CAP could be implemented, minor changes were made to the Oakland Risk-Based Corrective Action (RBCA) model that needed to be incorporated into the CAP. The revised cleanup level for benzene was determined to be 43 ppm at 15 feet below ground surface (bgs) for commercial property uses and 1.3 ppm at 15 feet bgs for residential property use as documented by you in an email dated July 31, 2000.

The remediation was performed by WRS Infrastructure & Environment, Inc. (WRS) in November and December 2000. The excavation sidewalls and bottom were sampled by Chaney, Walton & McCall (CW&M). As specified in the CAP, the remediation included excavation and removal of petroleum and benzene affected soils in the former pump island area extending west to include the area of boring B-9 and piezometer P-3 (shown on Figure 5 of the CAP). The depth of the excavation was approximately 15 feet bgs with the exception of the southwest corner that was excavated to a depth of 18 feet bgs. It was necessary to temporarily remove the existing canopy (which was subsequently replaced) and to permanently remove the former pump islands in order to excavate the affected soils.

A copy of CW&M's report documenting the confirmation sampling conducted prior to backfilling the excavation was enclosed with my letter of February 26, 2001. All confirmation samples with the exception of CD-1 (a bottom sample collected at 15 feet bgs in the southwest corner) had benzene levels below detection limits. Sample CD-1 was found to have benzene at a concentration of 99 ug/kg, well below the cleanup level. However, because soils still appeared to be discolored in this area, the southwest corner was excavated to a depth of 18 feet bgs. The sample DC-18 was collected from the bottom of this corner at 18 feet bgs and was not found to have benzene above the detection limit. The excavation was backfilled with clean imported fill and was supposed to have been compacted to 90% relative compaction.

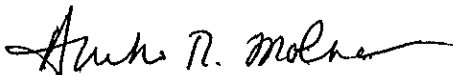
As we have discussed by telephone several times over the last year, the excavation was not adequately compacted by WRS. This resulted in serious subsidence issues during the winter of 2000/2001. Therefore, after lengthy negotiations with WRS, the clean backfill was excavated and backfilled again such that it was properly compacted to achieve the specified 90% relative compaction.

As you requested in your email dated July 3, 2001, additional soil samples were collected at the bottom of the excavation prior to backfilling to assure that cleanup levels had been achieved during the original remediation effort. Two samples were collected of native material at the bottom of the excavation, approximately 15 feet below the ground surface beneath the former dispenser islands. The soil samples were analyzed for benzene, toluene, ethyl benzene, and xylene using EPA Method 8021. The only compound detected was xylene at a concentration of 0.78 mg/kg in one of the samples. All other results were non detect. A copy of the letter report prepared by Geomatrix Consultants, Inc. documenting the environmental field sampling and laboratory testing activities performed is enclosed.

Based on the successful completion of the corrective action plan for the site, we are requesting final site closure without deed restrictions. The risk assessment performed showed that a benzene cleanup level of 1.3 ppm would result in no risk to human health if the property use was residential (it is currently zoned as commercial). We are also requesting permission to abandon the remaining monitoring wells and piezometers. The last groundwater sampling event was conducted in December 1999 and was documented in a letter report by SCI dated March 10, 2000.

Please call me at 415.389.0810 if you have any questions regarding this submittal.

Sincerely,



Aniko R. Molnar  
Representative for APA Fund, Ltd.

Cc: Nicholas D. Molnar, APA Fund Ltd. (w/o enclosure)  
Raymond Yu, Property Owner (w/ enclosure)

Enclosures (1)