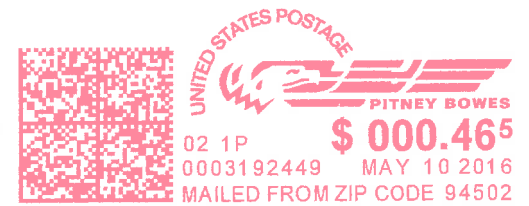




ALAMEDA COUNTY  
**HEALTH CARE SERVICES AGENCY**  
 DEPARTMENT OF ENVIRONMENTAL HEALTH  
 1131 Harbor Bay Parkway, Suite 250  
 Alameda, CA 94502-6577

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 28456 Century Street  
 Hayward, CA 94545-4800

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May 10, 2016

Raj Mulkh & Bhatia Kulwinder, et. al.  
4445 Pinewood Drive  
Union City, CA 94587-4824

Vintners Distributors, Inc  
28456 Century Street  
Hayward, CA 94545-4800

Hollis Phillips  
ARCADIS U.S., Inc  
100 Montgomery, Suite 300  
San Francisco, CA 94104  
(Sent via email to:  
[Hollis.Phillips@arcadis-us.com](mailto:Hollis.Phillips@arcadis-us.com))

Jim Smith  
BP Contracts Manager  
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Houston, TX, 77079  
(Sent via email to:  
[Jim.Smith2@bp.com](mailto:Jim.Smith2@bp.com))

Subject: Request for Data and Analysis; Fuel Leak Case No. RO0000076 and GeoTracker Global ID T0600100110, ARCO #04931, 731 W MacArthur Blvd, Oakland, CA 94609

Dear Responsible Parties:

This letter is in followup to a meeting held in the offices of the Alameda County Department of Environmental Health (ACDEH) on January 12, 2016, in an effort to move the case toward closure under the State Water Resource Control Board's Low Threat Closure Policy (LTCP). Thank you for attending the meeting. During the meeting, site data was reviewed to limit the areas of remaining concern under the LTCP.

Based on the meeting discussions ACDEH requests that you address the following technical comments and send us the items requested below.

#### **TECHNICAL COMMENTS**

- 1. 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 in the meeting indicates that sufficient data collection and analysis has not been presented to support the requisite characteristics of plume stability or plume classification as follows:

- a. Potential Receptor Separation Distance From Contamination** – As discussed in the meeting, all residential homes facing the service station across West Street, and all residential homes at least two parcels to the east of the service station (along both W. MacArthur Boulevard and 37<sup>th</sup> Street), did not respond to the sensitive receptor survey questionnaire which asked, among other items, about the presence of basements. It is understood that the immediately adjacent residential parcel to the northeast contains at least a partial basement.

Despite the number of soil bores and groundwater wells installed to investigate the site, depth to first groundwater at the site remains poorly understood due to past data collection methods. Available data provides conflicting data and the potential for either a water table aquifer, or a confined aquifer to be present. Based on the bore log for recently installed SB-7, the depth to first water downgradient of the site is approximately eight feet below grade surface (bgs). The known presence of a partial basement immediately adjacent to the site may result in the removal of approximately eight feet of separation (based on standard basement depths) between contaminated groundwater or soil vapor and a receptor, and place these undefined receptors at risk of exposure to the contamination. Therefore as discussed in the meeting, it appeared reasonable to conduct a desktop