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Alameda County
Environmental Health



January 10, 2011

Project 013300000.00006

Mr. Mark E. Detterman, PG, CEG
Hazardous Materials Specialist
Alameda County Health Care Services Agency
County Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Subject: Fuel Leak Case No. RO0000079 (Geotracker ID#T0600101659)
One National Engravers (ONE)
1001 42nd Street, Oakland, CA 94608

Dear Mr. Detterman:

On behalf of 1001 42nd Street, LLC, AMEC Geomatrix, Inc. ("AMEC"), has prepared this letter in response to the Alameda County Environmental Health (ACEH) directive letter dated December 16, 2010 requesting the status of: i) a Data Gap Work Plan for additional on and off-site investigations (i.e., utility mains and laterals, additional sources near the southeastern corner and other areas of the property, and off-site groundwater); ii) a Pilot Study and Groundwater Monitoring Report; and iii) a Groundwater Monitoring and Sampling Report. This letter summarizes the status of these reports and includes technical responses to two of ACEH's comments from the July 1, 2010 directive.

CURRENT STATUS

With respect to the Data Gap Work Plan, we wish to reiterate that further investigations of the utility corridors and other possible sources as requested in ACEH directives dated July 13, 2009 and March 4, 2010 (technical comments 6, 7, and 8) are not adequate uses of funds given that:

- only a finite amount of funds is available, as indicated by representatives of 1001 42nd Street, LLC to ACEH in previous meetings;
- the results of our June 5, 2007 screening-level risk evaluation indicated there is no apparent unacceptable health risk; and
- ACEH, in its directive letter dated January 3, 2006, had previously indicated that the extent of total petroleum hydrocarbons as mineral spirits (TPHms) "appears to be defined laterally and vertically" and "chlorinated compounds do not require further investigation or analysis at this time". To our knowledge, no new information has been collected since January 3, 2006 that would change ACEH's conclusion.

As indicated in our October 1, 2009 Responses to Comment letter, any new information from additional investigation activities is not expected to significantly alter the elements of the proposed corrective remedy to remove separate-phase mineral spirits from the subsurface,

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AMEC Geomatrix



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given the size of the property, the expected continued use of the existing buildings, our understanding of the primary sources, and the logistics of implementing a remedy given current site conditions. With the limited amount of funds available at this time, it is our recommendation that available funds be directly focused on reducing the known source by implementing the pilot test studies presented in our October 1, 2009 Work Plan for Vacuum Extraction Pilot Test and our May 3, 2010 Work Plan Addendum for Pilot Study to confirm the feasibility of the proposed remedial measures.

Consequently, no action has been undertaken regarding the Pilot Study or Groundwater Monitoring activities. Upon ACEH concurrence with this proposal to direct available funds to the Pilot Study, AMEC will proceed with field implementation. The Pilot Study and Groundwater Monitoring and Sampling Report will be submitted within 120 days of ACEH approval.

TECHNICAL RESPONSES TO JULY 1, 2010 COMMENTS

1. Vapor Monitoring Points and Extraction Well

ACEH is correct in that the proposed vapor monitoring wells (VP1, VP2, and VP3) are considered both alternative and contingency wells and final well designs will be based on the most recent depth to groundwater levels. As clarification and depending upon field conditions, the vapor monitoring points and extraction well will be advanced to depths across the actual first water-bearing zones.

2. Relocating / Replacing Well MW-B1

In its work plan, AMEC indicated that well MW-B1 may require replacement. ACEH recommended that well MW-B1 be replaced with a single well using a multiport sampling system, such as a continuous multichannel tubing (CMT) system or similar technology to allow for the sampling of multiple depth discrete intervals throughout a 20 foot interval instead of installation of two replacement wells - one with a 20-foot, and a second with a 5-foot screen length, as proposed. AMEC agrees that a CMT system or similar technology to facilitate sampling a number of discrete groundwater zones within a single borehole can provide high-resolution data, where appropriate. The purpose of such an installation would be to better understand flow pathways, the vertical distribution of chemicals in groundwater, and detailed definition on the extent of chemical plumes to facilitate the design of remedial measures. However, AMEC respectfully disagrees with ACEH's suggestion for this type of alternative well for this project:

- existing monitoring wells in the vicinity of the site are constructed with 20-foot screens; groundwater data from depth-discrete depth intervals from one new well would not be comparable due to a lack of an analogous dataset; and

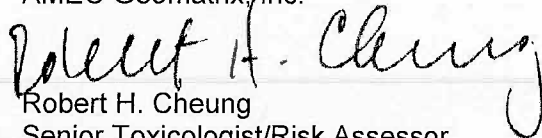
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- it is important to note that groundwater samples collected from existing monitoring wells do not indicate significant concentrations of dissolved constituents, except for total petroleum hydrocarbons as mineral spirits (TPHms) and the presence of separate phase product; hence there is no benefit to more detailed analysis, such as depth-discrete sampling, at this time.

Should data from the proposed replacement wells and other monitoring wells indicate the need for depth-discrete sampling, the installation of new wells can be discussed at a future time.

Please contact the undersigned if you have any question or comments.

Sincerely yours,
AMEC Geomatrix, Inc.



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cc: Deborah Castles, 1001 42nd Street, LLC