CONESTOGA-ROVERS
& ASSOCIATES

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January 27, 2012

Reference No. 521000

Ms. Barbara Jakub
Alameda County Health Care Services Agency
Department of Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

Dear Ms. Jakub:

Re: Proposed Elimination of Groundwater Monitoring and Sampling of Select Wells at 1137-1167 65th St
1137-1167 65th Street, Oakland, California 94608
Agency Case No. RO0000082

This letter is in response to the technical comments in your December 14, 2011 letter to Mr. John Nady, owner of the 1137-1167 65th Street site. Your letter requested Mr. Nady to perform work additional to what he proposed in his recent workplans. In particular, you requested that he re-sample, during the current winter months, the nine vapor probes he installed at the 65th Street site and submit the technical report by March 15, 2012.

The unanticipated cost of re-sampling the nine vapor probes and reporting on them this winter along with the cost of the second semi-annual groundwater sampling and reporting scheduled for February would cause Mr. Nady to exceed the budget imposed on his case by the Tank Fund. The Tank Fund has recommended for the Fiscal Year 2011-2012 that "claimants and regulators discuss strategies to continue corrective action work, perhaps at a smaller-scale or in a phased approach, for those sites with reduced available budgets from the Fund." A reduction in scope of the semi-annual groundwater monitoring would help toward reducing the costs that are in excess of the FY 2011-2012 budget. Groundwater in the existing wells, listed in the Hydrocarbons in Groundwater Table below, has been periodically monitored for up to 8 1/2 years. Monitoring of these chemicals has shown that for the past year or more all are at levels below the non-drinking water ESLs and most are at non-detect ("ND") levels. Based on our review and the justification presented in the tables below, we propose to eliminate monitoring, sampling and petroleum hydrocarbon analysis of samples collected from all wells that have been monitored since 2005 constructed in the loosely defined B- and C-Zones beneath the site and, additionally, eliminate monitoring, sampling and analysis of two A-Zone wells. The wells that are proposed for elimination are MW-2A, MW-4A, MW-1B, MW-3B, MW-6B, MW-7B, MW-3C, MW-6C and MW-7C.

HYDROCARBONS IN GROUNDWATER

Well	Second Most Recent Sampling Concentration and Date	Most Recent Sampling Concentration and Date
MW-2A	ND all, 10/01/2010	ND all, 03/29/2011
MW-4A	ND all, 10/01/2010	ND all, 03/29/2011
MW-1B	ND all, 09/28/2010	ND all, 03/29/2011
MW-3B	ND all, 10/01/2010	ND all, 03/29/2011
MW-6B	850 µg/l SS, 03/28/2011 610 µg/l GRO, 03/28/2011 370 µg/l DRO, 03/28/2011	670 µg/l SS, 08/29/2011 490 µg/l GRO, 08/29/2011 710 µg/l DRO, 08/29/2011
MW-7B	120 µg/l SS, 09/30/2010 52 µg/l GRO, 09/30/2010 94 µg/l DRO, 09/30/2010	ND all, 03/28/2011
MW-3C	ND all, 10/01/2010	ND all, 03/29/2011
MW-6C	ND all, 12/12/2005	ND all, 08/29/2011
MW-7C	110 µg/l SS, 09/30/2010 87 µg/l GRO, 09/30/2010 62 µg/l DRO, 09/30/2010	ND all, 03/28/2011

SS = Stoddard Solvent (SS), Drinking water ESL = 100 micrograms per liter (µg/l,)
Non-drinking water ESL (based on Gross Contamination Ceiling Value) = 2,500 µg/l
GRO = Gasoline-Range Organics (TPHg), Drinking water ESL = 100 µg/l,
Non-drinking water ESL (based on Gross Contamination Ceiling Value) = 5,000 µg/l
DRO = Diesel-Range Organics (TPHd), Drinking water ESL = 100 µg/l,
Non-drinking water ESL (based on Gross Contamination Ceiling Value) = 2,500 µg/l

These concentrations are in reference to California Regional Water Quality Control Board - San Francisco Bay Region's (RWQCB-SFBR) drinking water ESLs presented in Table F-1a of the document *Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater*, Interim Final, November 2007 (Revised May 2008 RWQCB-SFBR. The ESLs for both drinking water resources and non-drinking water resources are defined above. The non-drinking water ESL, as shown in Table F-1b of the referenced document, is 210 µg/l based on aquatic habitat exposure. As there is no aquatic habitat in the vicinity of the subject site, this ESL is not relevant. The most relevant ESL is the value established for gross contamination levels (odors, etc). That ESL for gasoline-range hydrocarbons (TPHg) is 5,000 µg/l, and for diesel-range

hydrocarbons (TPHd) it is 2,500 µg/l. Stoddard solvent (TPHss) is a suite of chemicals that overlap between gasoline and diesel so the use of the diesel-range hydrocarbon ESL is appropriate, being the lower of the two. Reported concentrations of these three hydrocarbons from the two most recent sampling events are all well below the ESLs based on Gross Contamination Values.

HVOCS IN GROUNDWATER

Well	Second Most Recent Sampling Concentration and Date	Most Recent Sampling Concentration and Date
MW-1A	6.7 µg/l PCE, 03/29/2011 7.7 µg/l cis-1,2-DCE, 03/29/2011 <0.5 µg/l VC, 03/29/2011	0.6 µg/l PCE, 08/29/2011 10 µg/l cis-1,2-DCE, 08/29/2011 1.3 µg/l VC, 08/29/2011
MW-3A	83 µg/l Chlorobenzene, 09/30/2010 <2.5 µg/l 1,2-DCB, 09/30/2010	86 µg/l Chlorobenzene, 03/29/2011 13 µg/l 1,2-DCB, 03/29/2011
MW-6A	ND all, 09/30/2010	ND all, 03/28/2011
MW-7A	0.8 µg/l Chlorobenzene, 09/22/2009	1.8 µg/l Chlorobenzene, 9/30/2010
MW-1B	5.8 µg/l cis-1,2-DCE, 03/29/2011 16 µg/l 1,1-DCA, 03/29/2011 6.1 µg/l 1,2-DCA, 03/29/2011	11 µg/l cis-1,2-DCE, 08/29/2011 18 µg/l 1,1-DCA, 08/29/2011 9.3 µg/l 1,2-DCA, 08/29/2011
MW-3B	ND all, 09/30/2010	ND all, 03/29/2011
MW-6B	0.95 µg/l Chloroethane, 09/30/2010 0.69 µg/l cis-1,2-DCE, 09/30/2010	ND all, 03/28/2011
MW-7B	ND all, 09/30/2010	ND all, 03/28/2011
MW-3C	ND all, 09/30/2010	ND all, 03/28/2011
MW-6C	ND all, 09/30/2010	ND all, 08/29/2011
MW-7C	ND all, 09/30/2010	ND all, 03/28/2011

PCE = Tetrachloroethene, Drinking water ESL = 5.0 µg/l,
Non-drinking water ESL (based on Gross Contamination Ceiling Value) = 3,000 µg/l
cis-1,2-DCE = cis-1,2-Dichloroethene, Drinking water ESL = 6.0 µg/l,
Non-drinking water ESL (based on Indoor Air Impacts) = 6,200 µg/l
VC = Vinyl Chloride, Drinking water ESL = 0.5 µg/l,
Non-drinking water ESL (based on Indoor Air Impacts) = 3.8 µg/l
Chlorobenzene, Drinking water ESL = 70 µg/l,

Non-drinking water ESL (based on Gross Contamination Ceiling Value) = 500 µg/l
1,2-DCB = 1,2-Dichlorobenzene, Drinking water ESL = 10 µg/l,
Non-drinking water ESL (based on Gross Contamination Ceiling Value) = 100 µg/l
1,1-DCA = 1,1-Dichloroethane, Drinking water ESL = 5.0 µg/l,
Non-drinking water ESL (based on Indoor Air Impacts) = 1,000 µg/l
1,2-DCA = 1,2-Dichloroethane, Drinking water ESL = 0.5 µg/l,
Non-drinking water ESL (based on Indoor Air Impacts) = 200 µg/l
Chloroethane, Drinking water ESL = 12 µg/l,
Non-drinking water ESL (based on Gross Contamination Ceiling Value) = 160 µg/l

These concentrations are in reference to the RWQCB-SFBR drinking water ESLs. This area of Oakland is served by municipal water supply. The first water bearing zone, and the loosely defined B- and C-Zones, occur at very shallow depths, within 25 feet of ground surface. Additionally, in general, the area surrounding the subject site has a history of light industrial and commercial development. Based on these factors, it is more appropriate to compare chemical concentrations to ESLs where groundwater is not a current or potential future drinking water resource. The non-drinking water ESLs are established in consideration of the gross contamination ceiling values (odors, etc), indoor air impacts, and aquatic habitat exposure. Again, there is no aquatic habitat in the vicinity of the subject site. While some chemical concentrations remain slightly above drinking water ESLs, no groundwater usage is known to occur in the area. Therefore, we request your concurrence for the elimination of EPA Method 8260 analysis for HVOCs in wells MW-1A, MW-3A, MW-6A, MW-7A, MW-1B, MW-3B, MW-6B, MW-7B, MW-3C, MW-6C and MW-7C.

Please review this proposed modification to the groundwater scope of activities at the subject site. In the interest of remaining within the USTCF FY 2011-2012 budget allocation, we wish to implement this monitoring and sampling reduction during the first quarter 2012 sampling event, scheduled for February. Please contact me either by email at bfoss@craworld.com or by phone at 510-420-3348 if you wish to discuss this proposal. Thank you in advance for your attention to this matter.

CONESTOGA-ROVERS
& ASSOCIATES

January 27, 2012

Reference No. 521000

Sincerely,
CONESTOGA-ROVERS & ASSOCIATES

Robert Foss

Robert Foss, P.G.

PROFESSIONAL GEOLOGIST
ROBERT C. FOSS
No. 7445
STATE OF CALIFORNIA

RCF/cm/16

Encl.: Site Plan

c.c.: Mr. Frederic Schrag, Esq.

I declare under penalty of perjury that the information and/or recommendations contained in this document are true and correct to the best of my knowledge.

Nady Trust U/D/T dated 1/21/1997

John Nady

John Nady, trustee

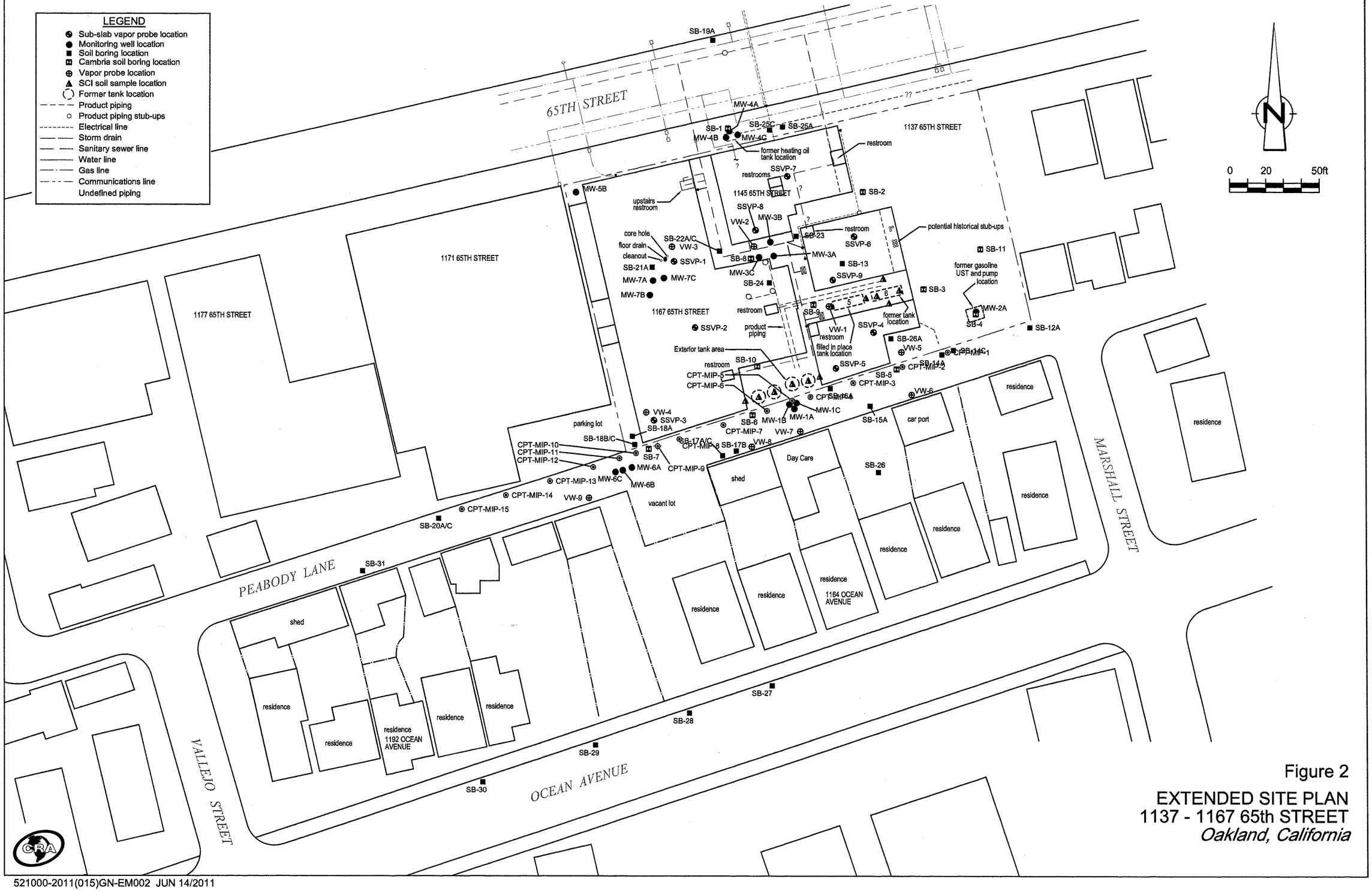

Figure 2

EXTENDED SITE PLAN
1137 - 1167 65th STREET
Oakland, California

521000-2011(015)GN-EM002 JUN 14/2011