Mr. Jerry Wick ham
Hazardous Materials Specialist
Alameda County Health Care Services Agency
Environmental Health Services.

July 12th, 2006.

RE: Eagle Gas
4301 Sanleandro St.
Oakland, CA 94601
Fuel Leak Case No. RO000096
USTCF Claim NO. 014551

Dear Sir

As the legally authorized representative of the above site,
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 knowledge.

Sincerely,

MOHAMMAD JAMIL
40092 Davis St
Fremont, CA 94538
Phone: (510) 656-3487
E-Mail: raheel400@hotmail.com

CLEARWATER
GROUP
Environmental Services

July 7, 2006

Mr. Jerry Wickham, PG
Alameda County Environmental Health Services
Environmental Protection Division
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

RE: Response to Technical Comments
June 27, 2006 Letter from Alameda County Environmental Health Services
Soil and Groundwater Investigation Report of June 1, 2006
Eagle Gas Station
4301 San Leandro Street
Oakland, California 94601

LOP St ID #2118
USTCF Claim No. 014551
Clearwater Group Project #ZP046D

Dear Mr. Wickham,

Clearwater Group (Clearwater) has reviewed your June 27, 2006 letter regarding Clearwater's June 1, 2006, "Soil and Groundwater Investigation Report" Eagle Gas, 4301 San Leandro Street, Oakland, California and has the following comments and questions.

Technical Comment 1: Grab Groundwater Sample Data Quality

Clearwater concurs with the ACEH regarding the suitability of grab groundwater samples and will incorporate grab groundwater sample analyses into the future Work Plan for Additional Soil and Groundwater Investigation (Work Plan).

229 Tewksbury Avenue ◆ Point Richmond, California 94801 ◆ Telephone: 510-307-9943 ◆ Fax: 510-232-2823

Technical Comment 2: Water Level Differences and Unrealistic Hydraulic Gradients

The existing water levels data, soil boring logs and well construction data were reviewed in an attempt to identify possible causes for the significant differences in water levels across the site. No cause of the overly steep gradients was found. Potential causes of the steep gradients include the following: 1) leakage from the onsite domestic water supply system, 2) perched water bearing zones, 3) onsite flow of shallow groundwater from an offsite, up-gradient direction, or 4) an error in surveying the well locations. The water level data was presented as recorded and the groundwater contours were drawn using the water level data. The Work Plan will include steps to determine the cause of the apparent steep gradients. Until such cause is found the data will be presented as recorded. If a cause is found, the previously presented groundwater data will be re-evaluated and corrected.

Technical Comment 3: Deep Monitoring Wells

Clearwater will propose in the Work Plan the installation of two onsite groundwater monitoring wells to intercept the "deep layer". Well MW-9 will be located near boring SB-7D. Well MW-10 will be located along the southwest property boundary and installed to intercept contamination migrating to the southwest. Pilot borings will be used for both borings in order to locate the screened intervals across more permeable lithologic layers. In general the screen intervals will not exceed 5 feet, unless thick permeable layers are encountered. The groundwater elevation data from the four onsite deep wells will allow a rough estimation of the groundwater flow direction and gradient of the "deep layer".

Technical Comment 4: Search for Additional USTs

The ground penetrating radar (GPR) search will focus on the area where Sanborn maps showed three possible USTs; however, the search will extend from the west corner to the north corner of the site along High Street.

Technical Comment 5: Chromatography/Dating of MTBE

Existing and future chromatographs will be examined to determine if the MTBE and other hydrocarbons detected in separate wells appear to be from similar or dissimilar sources. Dating of petroleum hydrocarbons and MTBE will be used in the mass flux calculations to determine the date of release of specific compounds. These data will be evaluated to help determine if an offsite source is impacting the site.

Technical Comment 6: Vapor Intrusion Into Buildings

For the off-site indoor vapor intrusion sampling, does ACEH concur that separate indoor vapor samples should be collected from within the two buildings to the southwest and southeast of the site? A separate vapor sample will be collected from within the onsite building. The Work Plan will discuss the vapor sample collection protocol and analysis of the samples.

Technical Comment 7: Leaking Water Lines

Selected groundwater samples will be analyzed for water treatment chemicals and coliform bacteria. Clearwater believes it possible that leaking domestic water or sewer lines are contributing water to the subsurface. The leaking water system may be responsible for the mounded groundwater observed near the center of the site and creating the anomalously steep groundwater gradients. If water treatment chemicals or coliform bacteria are detected, Clearwater will request that the client repair the onsite plumbing to stop the leakage. Wells MW-4, MW-7, MW-8, IS-1 and IS-5 will be sampled for water treatment chemicals and coliform bacteria.

Technical Comment 8: Off Site Investigation

Clearwater must perform due diligence for its client and needs to investigate the possibility that an offsite up-gradient source is impacting the site. The highest concentrations of MTBE in groundwater occur in wells EW-1 and MW-4 (700,00 and 740,000 ug/L, respectively) along the southeast edge of the site. Groundwater appears to be generally flowing toward the west to southwest and the highest groundwater elevations occur along the southeast edge of the site. Therefore, the possibility of an offsite source exists.

Clearwater proposes to increase the number of offsite borings from 4 to 8 borings. The two up-gradient borings will be drilled in the locations proposed in the Soil and Groundwater Investigation Report. Three borings will be drilled southwest of the site, in the sidewalk along High Street, and three soil borings will be drilled to the southeast, in the sidewalk along San Leandro Street. The spacing of the borings will be adjusted in the field, based upon the contaminant concentrations detected during drilling. The Work Plan will show the proposed starting locations and proposed step-out locations. The borings will start near the site and step-out increasingly further distances until non-detect conditions are encountered or it becomes apparent that an offsite source may be involved.

In order to be able to drill 3 or more step out borings per sidewalk, Clearwater will obtain soil boring permits from the Alameda County Public Works Agency (ACPWA) for approximately 10 borings per sidewalk, spaced at approximate 50 foot intervals. After the soil borings have been performed, the ACPWA will be notified of which boring locations were not drilled.

Clearwater seeks clarification regarding the offsite investigation. Is the ACEH requesting grab groundwater samples be collected and analyzed during the drilling of groundwater well borings, in order to select the lithologic intervals to be screened across?

One method to do this is to have a mobile analytical laboratory onsite during the well installations. However this approach would necessarily increase the amount of time needed to install each well. Ideally each well would be logged with a combination of a pilot boring using a continuous soil conductivity, or CPT, log and conventional soil logging by a field geologist, combined with analysis of grab groundwater samples from field-identified permeable zones.

Another approach is to use two mobilizations. During the first mobilization, in the pilot soil boring a continuous soil conductivity, or CPT, log is recorded and a lithologic log is prepared by a field geologist. A second borehole is driven to collect the grab groundwater samples, based on the lithology encountered in the borehole. The grab groundwater samples are sent out to be analyzed by a conventional fixed location analytical laboratory. After reviewing the site lithology and grab groundwater sample analytical results from the pilot boring a second mobilization to the site is used to install the groundwater monitoring wells.

Technical Comment 9: Screened Intervals for Well Cross Sections

Future cross section and well construction diagrams will show the screened sections of the wells.

Technical Comment 10: Quarterly Groundwater Monitoring

The quarterly groundwater monitoring program will incorporate all newly installed wells in the next quarterly groundwater monitoring event following their installation. Well installation should occur such that groundwater monitoring data is reflected in the Fourth Quarter 2006 groundwater monitoring event. The analytical results for EDB, EDC, methanol, and ethanol will be assessed to determine if these analyses should be continued.

CLEARWATER
GROUP, INC.
Environmental Services

Technical Report Request

Due to the revised understanding of the site's lithology and groundwater flow regime presented in the Site Conceptual Model section of the Soil and Groundwater Investigation Report, the Interim Remediation Start Up has not occurred and an Interim Remediation Start Up Report was not prepared.

Currently six ISOC oxygen enhancement wells have been installed onsite. The trenches, piping, controls, water treatment compound, and discharge system have not been installed. A discharge permit from EBMUD is in place. Completion of the Interim Remediation System is currently on hold.

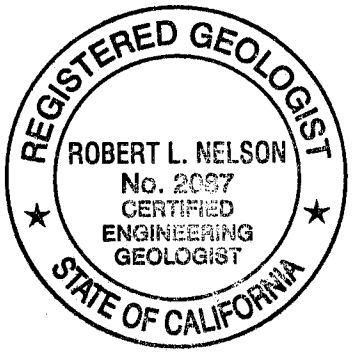
Clearwater believes that installing the previously planned interim remediation system is not warranted at this time, due to the revised understanding of the site's lithology and groundwater. Clearwater requests direction on whether to proceed as planned or to revise the Interim Remediation System Design. Clearwater also requests an extension until December 2006 for the start of the Interim Remediation, in order to incorporate the new site information presented in the (completed) Soil and Groundwater Investigation and the new data obtained from the future Additional Soil and Groundwater Investigation.

If there are any questions regarding this Response to Technical Comments, please do not hesitate to contact me at 510-307-9943 ext 237.

Sincerely,
Clearwater Group

Robert L. Nelson

Robert L. Nelson, PG, CEG
Senior Geologist



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4301 San Leandro Street
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