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Alameda County Environmental Health



Remedial Action Plan

Heitz Trucking 4919 Tidewater Avenue, Unit B Oakland, California 94601

Fuel Leak Case Number: RO0000107

September 2007

Prepared For:

R.W.L. Investments, Inc. 4919 Tidewater Avenue, Unit B Oakland, California 94601

Prepared By:

ETIC Engineering, Inc. 2285 Morello Avenue Pleasant Hill, California 94523



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<u>Siptember 14, 2007</u> Date

' Date



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GENERAL INFORMATION

Site Location

Heitz Trucking 4919 Tidewater Avenue, Unit B Oakland, California 94601

Alameda County Township 2 South, Range 3 West, Section 17 of the Mount Diablo Baseline and Meridian

Responsible Party

Bob Lawlor R.W.L. Investments, Inc. 4919 Tidewater Avenue, Unit B Oakland, California 94601

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Donna Drogos LOP Program Manager (510) 567-6721 donna.drogos@acgov.org

1.0 INTRODUCTION

On behalf of R.W.L. Investments, Inc., ETIC Engineering, Inc. (ETIC) has prepared this *Remedial Action Plan* (RAP) for the Heitz Trucking (formerly DiSalvo Trucking) facility located at 4919 Tidewater Avenue in Oakland, California (the Site). This RAP was prepared in accordance with the request by the Alameda County Health Care Services (ACHCS) in their letter dated May 29, 2007 and subsequent email correspondence dated June 25, 2007 and August 21, 2007 (Appendix A).

2.0 SITE BACKGROUND

2.1 DESCRIPTION OF SITE

The Site is located east of the San Francisco Bay in southwest Oakland, approximately 500 feet southeast of the Tidewater Avenue and Lasser Street intersection, on the southwest side of Tidewater Avenue (Figure 1). The Site is located in Section 17 of Township 2, Range 3. The Site is currently owned by R.W.L. Investments, Inc. and leased to Heitz Trucking.

The 3.61 acre property contains an approximately 11,800 square-foot concrete warehouse and loading dock terminal along the north side of the Site, an office trailer, and an approximately 2,770 square-foot truck repair shop and maintenance building along the southern side of the Site (ART, 2007). An aboveground fuel storage tank is located north of the maintenance building and outside yard areas are located along the northwest side of the building and between the buildings.

The Site is listed as a fuel leak case and is overseen by ACHCS.

2.2 LOCAL GEOLOGY AND HYDROGEOLOGY

Soil borings from previous onsite investigations indicate that the area beneath the Site was likely filled to create land and lift the surface roughly 5 feet above the high tide line (ART, 2007). The soil beneath the Site consists mostly of gravel and sand fill with concrete and asphalt debris (ART, 2007). The thickness of the fill material varies across the site from about 1.5 feet thick near the southern corner and 4 to 5 feet along the northern property to greater than 9 feet thick along Tidewater Avenue (ART, 2007). The fill is underlain by organic clay with thin interbeds of peat material.

Groundwater flow direction in the area of the Site is toward the San Francisco Bay. Historically, depths to groundwater measured in monitoring wells at the Site have ranged from 1.14 to 3.88 feet below ground surface (bgs) (Table 2). The hydraulic gradient has historically ranged from 0.001 to 0.007 foot-per-foot. However, there may not be a dominant gradient or flow direction due to the influence of tidal fluctuations from the nearby tidal canal.

2.3 TOPOGRAPHY AND SURFACE WATER

The land surface in the area of the Site generally slopes down to the west toward San Francisco Bay. The Site property is relatively flat with little topographic change. The elevation of the Site is approximately 5 feet above mean sea level (msl).

The San Leandro Bay is located approximately 350 feet to the south of the site. Lake Merritt is a tidal lagoon located 5.7 miles northwest of the Site. The salt/freshwater lake covers an area of approximately 155 acres and the primary uses are recreation and aesthetics.

2.4 UST HISTORY

The Site reportedly operated one 10,000-gallon diesel underground storage tank (UST), one 5,000-gallon diesel UST, and one 280-gallon used-oil UST until their removal in March 1989 (GET,1989a). The USTs were reportedly installed in 1968 with a remote dispenser system (GET, 1989b). The remote dispenser system consisted of four remote hydrants in two separate lines, one on the north side and one on the south side of the trucking terminal building. Two pressurized single-wall 2-inch diameter galvanized steel lines were connected to a red jacket pump located on the 10,000-gallon diesel UST. One 2-inch diameter product line crossed underneath the trucking terminal building and connected to the first remote hydrant on the north side of the building, adjacent to the USTs. A 1-½-inch diameter galvanized steel line connected the first hydrant to the second remote hydrant in each line. The hydrant lines were located approximately 2 feet bgs (GET, 1989b).

In March 1989, the three USTs, fill lines, and the southern remote hydrant dispenser lines were removed. Two areas of corrosion were visible when the hydrant line was removed (GET, 1989b). During removal activities a 550-gallon UST was discovered and also removed. Visual inspection identified two holes in the 550-gallon UST. In addition, a 10-inch diameter pipe line crossing the excavation was discovered. The pipe was broken during excavation activities and "diesel-like fuel" drained into the UST excavation (GTE, 1994a). The pipe was cut, the middle section was removed, and the ends were capped at the limits of the excavation (GTE, 1994a).

Petroleum hydrocarbons were detected at concentrations up to 240 milligrams per kilogram (mg/kg) in soil samples collected from the UST excavation. Diesel-impacted groundwater was observed flowing into the open UST excavation from the northeastern corner.

Approximately 3,000 cubic yards of excavated soil were treated onsite by enhanced biodegradation (GTE, 1991). The excavated soil was placed into a landscape berm located between Tidewater Avenue and the Site boundary and used as fill across the Site (GTE, 1994c).

The liquid-phase hydrocarbons (LPH) and contaminated groundwater were pumped from the excavation pit for disposal. In April 1989, a recovery well and recovery trench were installed from which an estimated 2,400 gallons of diesel fuel and 20,000 gallons of contaminated groundwater were recovered between April and August 1989 (GTE, 1991).

2.5 SUBSURFACE INVESTIGATIONS (1989 THROUGH 2006)

Subsurface investigations were performed at the Site from 1989 to 2006. Historical groundwater monitoring well, soil, and grab groundwater sampling data are presented in Tables 3, 4, and 5, respectively. These investigations confirmed the presence of diesel- and gasoline-impacted soil and groundwater beneath the Site and identified LPH at various locations including in monitoring wells MW-2 and MW-3. Total petroleum hydrocarbons in the diesel range (TPH-d), total petroleum hydrocarbons in the gasoline range (TPH-g), benzene, toluene, ethylbenzene, and xylenes (BTEX), and fuel oxygenate methyl tertiary butyl ether (MTBE) have been detected in groundwater samples collected at the Site.

In May 1989, Geo-Environmental Technology (GET) performed a shallow soil investigation at the Site in which 11 soil samples and one groundwater sample were collected from 22 shallow soil borings (BH-1 through BH-22). Samples were not collected from borings with obvious petroleum impacts (GET, 1989b). Soil sampling confirmed the presence of diesel-impacted soil in the area of the former UST excavation and along the former fuel dispenser hydrant line extending from the former USTs to the northeast. The maximum TPH-d concentration (46,000 mg/kg) was detected in a soil sample collected at 5 feet bgs from boring BH-11, located approximately 10 feet west of the former UST excavation (GET, 1989b). Oil and grease was detected in this same sample at a concentration of 27,000 mg/kg.

In an April 1994 soil and groundwater investigation, Gen-Tech Environmental (GTE) drilled 14 borings (EB-1 through EB-11 and MW-1 through MW-3), collected soil and groundwater samples, and installed three groundwater monitoring wells (MW-1 through MW-3) (GTE, 1994b). The maximum concentrations of TPH-d (29,000 mg/kg) and oil and grease (36,000 mg/kg) in soil were detected in samples from boring MW-2. The maximum concentrations of TPH-d detected during grab groundwater sampling were 64,000 micrograms per liter (μ g/L) from boring EB-2 and 73,000 μ g/L from boring EW-4. Groundwater monitoring well sampling conducted on April 14, 1994 indicated LPH in monitoring well MW-2 and elevated concentrations of TPH-d and TPH-g (7,700 μ g/L and 250 μ g/L, respectively) in well MW-3 (GTE, 1994b).

In July 1995, Environmental Restoration Services (Enrest) drilled two soil borings and installed monitoring well MW-4 (ART, 2007). MW-4 was installed on the northern side of the terminal building. TPH-g (250 μ g/L) and low concentrations of BTEX were detected in the August 1995 groundwater sample from MW-4.

PIERS Environmental (PIERS) drilled 16 soil borings (SB-1 through SB-16) during a soil and groundwater investigation in December 2000. Eight soil samples between 6 and 7 feet bgs and 16 grab groundwater samples were collected and analyzed for TPH-d. The only TPH-d detection in soil was 14 mg/kg in a sample collected from SB-16 at 6.5 feet bgs. The maximum TPH-d concentration in groundwater was 670,000 μ g/L (SB-10). PIERS identified two main areas of TPH-d impacted soil: 1) located in the area of the former UST excavation and 2) from the northeast end of the recovery trench to the area of MW-2. TPH-d concentrations in groundwater along the northwestern property boundary were 44,000 μ g/L (SB-14) and 48,000 μ g/L (SB-15) and PIERS concluded that the groundwater contamination plume extended offsite to the northwest.

In February and April 2006, ERAS Environmental (ERAS) conducted additional subsurface investigations to further delineate vertical and lateral extents of diesel impacts in soil and groundwater at the Site (ERAS, 2006b). In February 2006, ERAS collected soil and groundwater samples from soil borings B-1 through B-9 for TPH-d analysis and Murray Engineers, Inc. (Murray) collected soil samples from borings B-6 through B-9 for geotechnical analysis (named B-1 through B-4 for the Murray report). In April 2006, an 8-inch dewatering well (EW-1) and four observation wells (OB-3 through OB-6) were installed and soil and groundwater samples were collected from borings B-10 through B-15. No LPH was encountered during these investigations. The maximum detection of TPH-d in soil was 5,400 mg/kg collected from B-9 at 4.5 feet bgs, located adjacent to the southwestern corner of the former UST excavation. The maximum concentration of TPH-d in groundwater was 2,500,000 μ g/L collected from B-12 located northwest of the former UST excavation.

Geotechnical results were reported by Murray in an April 2006 *Limited Geotechnical Evaluation Contaminated Soil Replacement Report*. The report summarized the subsurface geology and provided shoring design parameters for potential excavation activities at the Site.

Applied Remedial Technologies, Inc. (ART) conducted a groundwater aquifer test and construction dewatering analysis. ART performed both a step down drawdown pumping test and a constant-rate aquifer test at well EW-1. Pumping from EW-1 (screened across the fill material and approximately three feet into the clay unit underlying the fill material) resulted in drawdowns in all observation wells screened in fill material. No drawdown was observed in well OB-5, which was screened in the clay unit, located approximately seven feet from EW-1 (ART, 2006).

In February 2007, ART prepared a *Feasibility Study Report* to address the removal of petroleum hydrocarbons from the Site subsurface. Based on the feasibility evaluation of remedial alternatives, ART recommended groundwater extraction and treatment with limited source area remediation.

2.6 GROUNDWATER MONITORING (1994 THROUGH 2007)

Groundwater monitoring has been conducted at the site intermittently since April 1994. Two monitoring wells, MW-2 and MW-3, historically have had LPH, which was removed by bailing. Groundwater flow direction has been difficult to determine due to tidal influence and it has generally flowed to the southwest and west with a shallow gradient. The first semi-annual 2007 groundwater sampling event took place in June 2007. Groundwater analytical results for this monitoring event are consistent with historical sample results.

2.7 CURRENT SITE STATUS

In their May 29, 2007 letter, ACHCS requested the following:

- Submit a RAP to include a description of how the affected soil area would be precisely determined and how remedial alternatives other than excavation would be evaluated.
- Continue semi-annual groundwater monitoring.

On June 27, 2007, ETIC performed the first semi-annual groundwater monitoring event for 2007. A report summarizing the results of the sampling activities was submitted on July 26, 2007. The second semi-annual groundwater monitoring event for 2007 is scheduled for December.

This document includes a site conceptual model to detail the current understanding of the chemicals of concern and the affected media at the Site. Section 4.0 proposes remedial activities including a geophysical survey, soil and groundwater investigation and monitoring well installation. Review of historical documents indicates that remote fuel hydrant dispenser piping on the northern side of the trucking terminal building, under a portion of the building, and between the former UST excavation and the building were left in place. A geophysical survey will provide information on the existence and location of underground piping at the Site.

Additional soil and groundwater sampling is proposed to delineate the vertical and lateral extent of the soil and groundwater TPH-d contamination on the Site. This sampling would take place after the geophysical survey to include locations adjacent to any identified piping. An

additional monitoring well is also proposed to monitor the groundwater in the northern corner of the Site.

Once the source(s) of contamination and the vertical and lateral extent of the contamination have been determined, remedial actions including pipe removal, soil excavation, and groundwater extraction may be utilized to address the contamination at the Site.

3.0 SITE CONCEPTUAL MODEL

3.1 CHEMICALS-OF-CONCERN AND AFFECTED MEDIA

Analytical data from historical and current soil and groundwater sampling (Tables 3, 4, and 5) indicate the subsurface beneath the Site has been impacted by the presence of petroleum hydrocarbons. TPH-d, total oil and grease (O&G), TPH-g and BTEX have been detected in soil samples collected on the Site. A limited number of soil samples collected from the vadose zone indicate concentrations of up to 29,000 mg/kg TPH-d and 36,000 mg/kg O&G (MW-2 at 2 feet bgs) downgradient of the former USTs. In Section 4.0, additional sampling is proposed to evaluate the extent of petroleum hydrocarbons in soil on the Site.

Petroleum hydrocarbons have also been detected in groundwater samples collected at the Site. Concentrations of TPH-d up to 2,500,000 μ g/L have been detected in grab groundwater samples collected at the site (B-12). In Section 4.0, additional sampling is proposed to evaluate the downgradient extent of petroleum hydrocarbons in the subsurface.

Due to the volatility of petroleum hydrocarbon compounds, soil vapor beneath the site may also be impacted.

3.2 SOURCES OF CONTAMINATION

The former fuel USTs and the diesel remote hydrant piping system at the property are sources of contamination, as indicated by historical data.

3.3 TRANSPORT MECHANISMS

Historically, petroleum hydrocarbon contamination has been detected in soil and groundwater samples. The primary transport mechanisms for the petroleum hydrocarbons are advection, adsorption, desorption, and volatilization. Petroleum hydrocarbons in the vicinity of the former UST excavation and remote fuel dispenser system can migrate downgradient and offsite primarily through advection. The soil and groundwater data indicate that both media are

affected in the shallow aquifer, and consequently adsorption and desorption between the two phases may be occurring. Petroleum hydrocarbons (particularly TPH-g and BTEX) may volatilize from soil and/or groundwater into soil vapor. Volatilization of petroleum hydrocarbons from soil and groundwater into the vapor pore space may result in the subsequent migration to the ground surface.

3.4 POTENTIAL EXPOSURE PATHWAYS AND RECEPTORS

Potential exposure pathways and receptors at the site and neighboring properties were evaluated based on current and potential future usage. The Site is currently used for commercial/industrial purposes, with nearby land used for commercial and industrial purposes. The property is largely paved.

Potentially-complete exposure pathways and receptors have been identified for the site, with the following criteria:

- A source and mechanism of chemical release;
- One or more retention or transport media (e.g., soil, groundwater, soil vapor, air, or surface water);
- A point of potential contact with the impacted medium (referred to as the exposure point); and
- An exposure route at the point of contact (e.g., inhalation, ingestion, or dermal contact).

Figure 4 illustrates a schematic diagram of the site conceptual model, and Figure 5 shows the exposure pathway flow chart. Site-specific, potentially-complete exposure pathways and potential receptors are depicted on the figures, and are summarized as follows:

- Inhalation of chemicals volatilizing from soil or groundwater to indoor or outdoor air (onsite or offsite residential, commercial, or industrial receptors);
- Inhalation of volatiles, dermal contact, or incidental ingestion of contaminated soil or groundwater through excavation (onsite or offsite construction workers);
- Ingestion of or dermal contact with contaminated groundwater from a potential current or future water supply well (onsite or offsite residential, commercial, or industrial receptors); and
- Dermal contact with or incidental ingestion of contaminated surface water (offsite residential, commercial, or industrial receptors or construction workers).

Based on the potential for residual petroleum hydrocarbon impacts at depths less than 5 feet bgs, occupants could be subject to direct exposure (ingestion or dermal contact) to residual petroleum hydrocarbons in soil for current land use at the Site. Construction workers could also have direct exposure to the residual contamination, if excavation occurs in the future.

Ingestion of or dermal contact with impacted groundwater at the site is a potential human health risk for occupants. Installation of a shallow water-producing well within the contaminant plume could create a direct and complete exposure pathway. A survey of waterproducing wells present in the site vicinity will demonstrate whether this exposure pathway is currently complete. A future sensitive receptor survey may be performed which would include a well search determine whether there are any production wells in the vicinity of the site. Construction workers may also have direct exposure to the residual contamination in groundwater if excavation and/or dewatering activities occur in the future.

The vapor intrusion pathway from impacted soil and/or groundwater to outdoor or indoor air is potentially complete. A future soil vapor investigation and intrusion study may be performed to evaluate the potential health risks associated with indirect exposure via inhalation of volatiles from the subsurface, depending on results of future soil and groundwater investigation and potential remediation.

Should contaminated groundwater discharge to surface water, there could be a potentiallycomplete exposure pathway for occupants or construction workers in the vicinity

4.0 PROPOSED REMEDIAL ACTIVITIES

4.1 GEOPHYSICAL SURVEY

In order to identify subsurface conditions including the location of potential fuel hydrant dispenser lines left in place on the north side of the trucking terminal building, a geophysical survey will be performed at the Site. Geophysical surveys use non-invasive techniques to identify the presence of subterranean objects or anomalies. The geophysical survey will be performed under the direction of a California Professional Geophysicist and observed by an ETIC geologist.

The geophysical survey may include an electromagnetic survey and ground penetrating radar. An electromagnetic survey is used to measure the apparent conductivity of the subsurface. The terrain conductivity meter uses a radio-frequency signal to investigate the subsurface and may detect variations at depths of 15 feet bgs or less. Variations in the characteristics of the reflected signal indicate variations in the conductivity of the subsurface. Measurements will be taken on an approximate 5-foot by 5-foot grid over the property in the areas shown on Figure 6.

The electromagnetic survey may be followed by ground penetrating radar, used to further investigate areas identified during the electromagnetic survey to better define the extent of objects or anomalies within the upper 3 to 5 feet of the subsurface. Ground penetrating radar continuously radiates an electromagnetic pulse into the subsurface and detects variations in electrical properties of the subsurface.

4.2 SOIL AND GROUNDWATER INVESTIGATION

The results of previous soil and groundwater investigations performed indicate that additional characterization of the extent of contamination is needed. Additional information is needed to delineate the vertical and lateral extent of TPH-d contamination in the area of the former UST excavation, the potential fuel hydrant lines on the northern and southern sides of the building in the area of MW-2 and in the northern corner of the property. Soil and shallow groundwater samples will be collected from 10 borings to further characterize petroleum hydrocarbon contamination in these areas. The proposed boring locations (C-1 through C-10) are shown on Figure 7.

Drilling will be performed by a C57-licensed contractor, using a direct-push drilling rig. Drilling equipment and sampling tools will be decontaminated prior to beginning the field program. Reusable sampling equipment will be thoroughly washed with a Liqui-Nox solution, rinsed with tap water, and then rinsed with distilled water prior to each use. An ETIC geologist will supervise drilling and sampling activities. Soil samples will be examined for lithologic identification and visible signs of contamination in accordance with the Unified Soil Classification System and the Standard Practice for Description and Identification of Soils (Visual-Manual Procedure), American Society for Testing and Materials (ASTM) Designation D2488 (ASTM 2000), and the observations will be recorded in the field logs. Technical guidance for the program will be provided by a California Professional Geologist.

A photoionization detector or flame ionization detector will be used to monitor for organic vapors. Measurements of headspace vapors from soil samples will be recorded on the boring logs. If any unusual stains or odors are evident in the soil, additional samples will be collected for laboratory analyses.

Each soil boring will be drilled to a total depth of no more than approximately 10 feet bgs. A slide hammer will be used to collect an initial sample at 2 feet bgs at each location. Additional soil samples will be collected from the borings at approximate 5-foot intervals, at changes in lithology, at the soil-water interface, and where contamination is evident. The samples will be

submitted for laboratory analyses. Additional soil samples may be collected and held for subsequent analysis, pending the results of the initial sample analyses.

The samples will be cut directly from the direct-push acetate liners. The liners will be sealed with Teflon tape and vinyl end caps, labeled, stored on ice in a thermally insulated cooler, and transported under chain-of-custody protocol to a state-certified analytical laboratory.

Each of the soil borings will be drilled into the first aquifer for the collection of groundwater samples. A groundwater sample will be collected from each boring using a new disposable bailer or tubing with check valve. The samples will be collected in clean 40-milliliter, hydrochloric-acid-preserved, volatile organic analysis (VOA) vials supplied by the analytical laboratory. The sample containers will be sealed, labeled, stored on ice in a thermally-insulated cooler, and then transported under chain-of-custody protocol to a state-certified analytical laboratory.

The soil and groundwater samples will be analyzed for TPH-d by EPA Test Method 8015M with silica gel cleanup and BTEX by EPA Method 8260B.

Reusable groundwater sampling equipment will be thoroughly washed with a Liqui-Nox solution, rinsed with tap water, and then rinsed with distilled water prior to each use. The completed borings will be filled and sealed with a grout mixture consisting of neat cement, in accordance with ACHCS and Department of Water Resources (DWR) requirements.

4.3 GROUNDWATER MONITORING WELL INSTALLATION

ETIC proposes to install one additional 2-inch diameter groundwater monitoring well downgradient of the former UST excavation in the northern corner of the subject property. The location for the well, and details concerning its construction will be based on the results of the direct-push subsurface investigation proposed in this plan. Details summarizing well installation procedures are presented below.

4.3.1 Drilling and Soil Sampling

Drilling permits and variance permits to allow for a less than 10-foot grout seal in the well construction will be obtained from ACHCS. A health and safety plan will be prepared and implemented during drilling and sampling activities. Prior to drilling activities, the proposed soil boring locations will be marked and checked for the presence of underground utilities by Underground Service Alert. A private utility-locating contractor will also be hired to check for the presence of underground utilities.

Drilling will be performed by a C57-licensed contractor using a truck-mounted rig equipped with 8-inch diameter hollow-stem continuous-flight augers. Drilling equipment and sampling tools will be decontaminated prior to beginning the field activities. Reusable sampling equipment will be washed with a Liqui-Nox solution, rinsed with tap water, and rinsed with distilled water prior to each use. An ETIC geologist will supervise the drilling and sampling activities. Soil samples will be examined for lithologic identification in accordance with the Unified Soil Classification System and the Standard Practice for Description and Identification of Soils (Visual-Manual Procedure), American Society for Testing and Materials (ASTM) Designation D2488 (ASTM 2000), visible signs of contamination, and observations will be recorded on a field log. A field meter will be used to monitor for organic vapors and to measure headspace vapors from soil samples. Technical guidance for the activities will be provided by a California Professional Geologist.

Soil samples will be collected at 5-foot intervals for lithologic identification and laboratory analyses. The samples will be collected in clean stainless steel liners. The liners will be sealed, labeled, stored on ice in a thermally-insulated cooler, then transported and delivered to a state-certified analytical laboratory under chain-of-custody protocol. If evidence of contamination exists, then additional soil samples may be collected and submitted for laboratory analyses. At a minimum, the soil samples will be analyzed for TPH-d by EPA Test Method 8015M with silica gel cleanup and BTEX by EPA Method 8260B.

4.3.2 Groundwater Monitoring Well Construction

Each groundwater monitoring well will be constructed using 2-inch diameter Schedule 40 polyvinyl chloride (PVC) casing. The total depth of each well and the slot size used in the screened portion of the wells will be determined based on the results of the direct-push subsurface investigation proposed in this RAP. The screened intervals will be selected based upon hydrogeologic data obtained during drilling. An appropriately-sized filter pack will be placed in the annular space of the borehole adjacent to the screened interval. The filter pack will be extended slightly above the top of the screened interval to allow for settlement during well development. A transitional seal, consisting of hydrated bentonite, will be placed above the filter pack in the annular space of the borehole. A grout slurry, consisting of neat cement, will be placed in the annular space above the bentonite seal to near ground surface. An inspector from ACHCS will observe and approve the grouting procedures. A traffic-rated vault box, expandable locking cap, and padlock will be installed to secure each monitoring well. Following installation activities, a DWR 188 Well Completion Report will be prepared for each monitoring well and submitted to ACHCS and DWR.

4.3.3 Well Development and Sampling

The monitoring wells will be developed at least 72 hours after their installation. The depth to water and product thickness (if present) will be measured in each monitoring well to the nearest 0.01 foot, using an electronic oil/water interface probe. Development will consist of surging the screened interval of the monitoring well with a vented surge block of the same diameter as the casing for approximately 10 minutes. The monitoring well will be purged using one of the following methods:

- A vacuum truck equipped with a dedicated PVC stinger or disposable tubing;
- An inertial pump;
- A submersible electric pump;
- A centrifugal pump;
- An air-lift pump; or
- A bailer.

As part of the development, each monitoring well will be purged until at least 10 casing volumes of groundwater have been removed, the water is free of silt and apparent turbidity, and water quality parameters (including temperature, pH, specific conductance, dissolved oxygen, and oxidation-reduction potential) have stabilized.

A record of the purging methods, water quality parameters, and volumes of water purged will be maintained. Purge water will be contained `in properly labeled 55-gallon drums and transported to an appropriate treatment or disposal facility. Reusable sampling equipment will be washed with a Liqui-Nox solution, rinsed with tap water, and rinsed with distilled water.

Following at least 48 hours after development, each monitoring well will be purged and groundwater samples will be collected in clean bottles supplied by the analytical laboratory. Sample bottles will be sealed, labeled, placed in resealable plastic bags and immediately placed on ice in a thermally-insulated cooler, and transported to a state-certified analytical laboratory under chain-of-custody protocol. At a minimum, the groundwater samples will be analyzed for TPH-d by EPA Test Method 8015M with silica gel cleanup and BTEX by EPA Method 8260B. Following the initial sampling, sampling of the newly-installed wells will be incorporated into the quarterly groundwater monitoring schedule.

4.4 MONITORING WELL SURVEYING

In accordance with the State of California *GeoTracker* requirements, the locations and elevations of monitoring wells will be surveyed. The survey will be performed by a Californialicensed Professional Land Surveyor and include latitude, longitude, ground-surface elevation, and top of casing elevation at each monitoring well. Latitude and longitude will be referenced to the NAD83 datum and elevation will be referenced to the NAVD88 datum.

A survey data report will be uploaded into California *GeoTracker*, and will be used to prepare future groundwater elevation maps for the subject site.

4.5 DISPOSAL OF INVESTIGATIVE-DERIVED WASTE

Soil and water derived from the subsurface investigation will be contained in Department of Transportation (DOT)-approved drums stored temporarily at the property. A composite soil sample and a water sample will be collected and submitted for laboratory analyses to allow the waste to be profiled and delivered to an approved disposal facility.

5.0 POTENTIAL REMEDIATION ACTIVITIES

5.1 PIPELINE EXCAVATION AND REMOVAL

If the geophysical survey identifies fuel hydrant piping, ETIC proposes to excavate and remove the remaining fuel pipe lines to the extent practicable. Prior to removal, the contents of the pipelines will be drained and the lines will be pressure washed with a biodegradeable cleaning solution. The cleaning rinsate will be contained in 55-gallon drums, pending offsite disposal. The dimensions of the each component will be measured and recorded and the lines will be inspected for cracks, seams, holes, and evidence of leakage. The piping debris will then be excavated and placed on, and covered with, plastic sheeting, pending transportation to an appropriate recycling or disposal facility. If piping is located beneath the existing trucking terminal building, the line will be flushed, cut, filled with concrete or cement grout, and capped in-place. Impacted soil will be excavated as part of removal activities.

Confirmation soil samples will be collected at 20-foot intervals along the piping runs and at areas of visible contamination. The samples will be submitted for laboratory analyses.

5.2 SOIL EXCAVATION

Excavation may be proposed for areas of elevated levels of TPH-d. Potential areas of excavation may include the former UST excavation, remote hydrant fuel lines, and the area in the vicinity of well MW-2. If groundwater did not accumulate in the bottom of the excavations, soil samples will also be collected from the floor of each excavation. Soil generated during excavation may be directly loaded into trucks for offsite disposal or stockpiled on, and covered with, plastic sheeting and temporarily stored onsite until transported to an approved disposal facility. Upon completion of source removal activities, the remedial excavations will be backfilled, compacted, and resurfaced. Any water in the excavations will backfilled and the surface restored.

5.3 EXCAVATION DEWATERING

If excavation is conducted, each excavation will be dewatered to remediate affected groundwater, to provide stability for the excavations, and to allow for proper backfilling and compaction. Groundwater will be pumped into a holding tank, removed from the tank as necessary, and transported to a licensed treatment or disposal facility. If present, groundwater samples will be collected from the excavations and submitted for laboratory analyses.

5.4 GROUNDWATER EXTRACTION

An assessment of remediation options may indicate that groundwater extraction is an appropriate remedial alternative for the Site. If required, then this activity could include the installation of a network of 4-inch diameter extraction wells. The locations of any proposed extraction wells will be discussed with ACHCS, prior to installation. Extraction well installation activities will be performed in accordance with the procedures described in Section 4.3. The extraction wells will be designed and constructed to target the zone of residual contamination for remediation.

5.5 POST-REMEDIATION SAMPLING PLAN

Once remedial options have been implemented, a sampling plan will be developed to monitor petroleum hydrocarbon concentrations at the Site. The plan may include confirmation soil sampling and some groundwater monitoring.

6.0 SCHEDULE

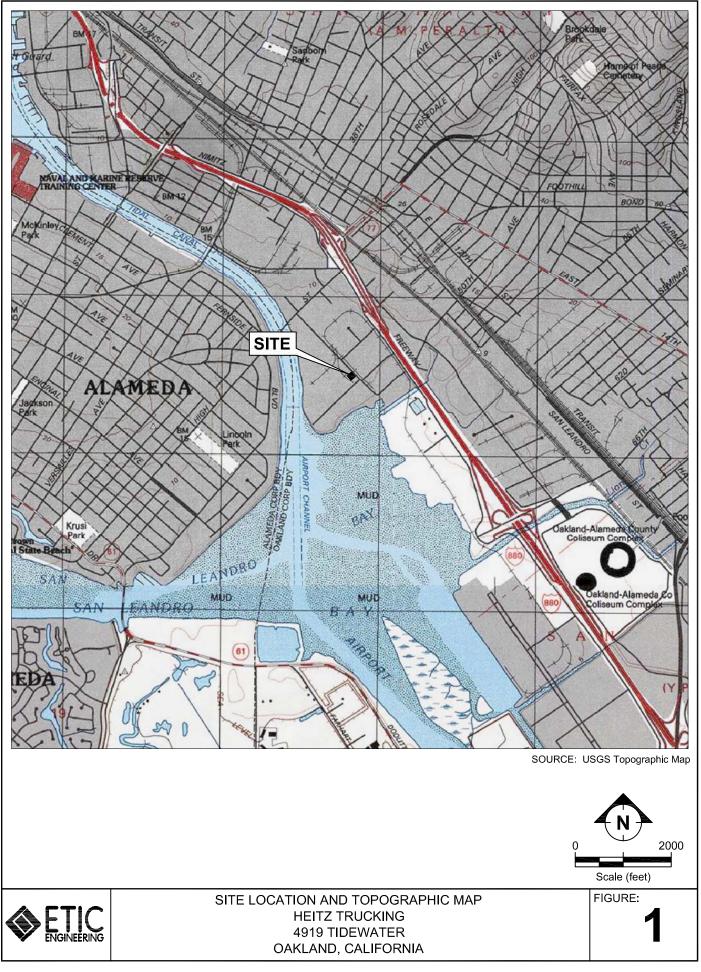
A geophysical survey will be scheduled upon approval of the work plan from ACHCS. Drilling and sampling can be scheduled upon receipt of geophysical survey results. The written report summarizing the results of both the geophysical survey, the soil and groundwater investigation, and monitoring well installation will be completed within eight weeks following the receipt of analytical data for soil and groundwater samples collected during the investigation. The investigation report will include an assessment of the remedial options for the Site and a remedial plan.

7.0 **REFERENCES**

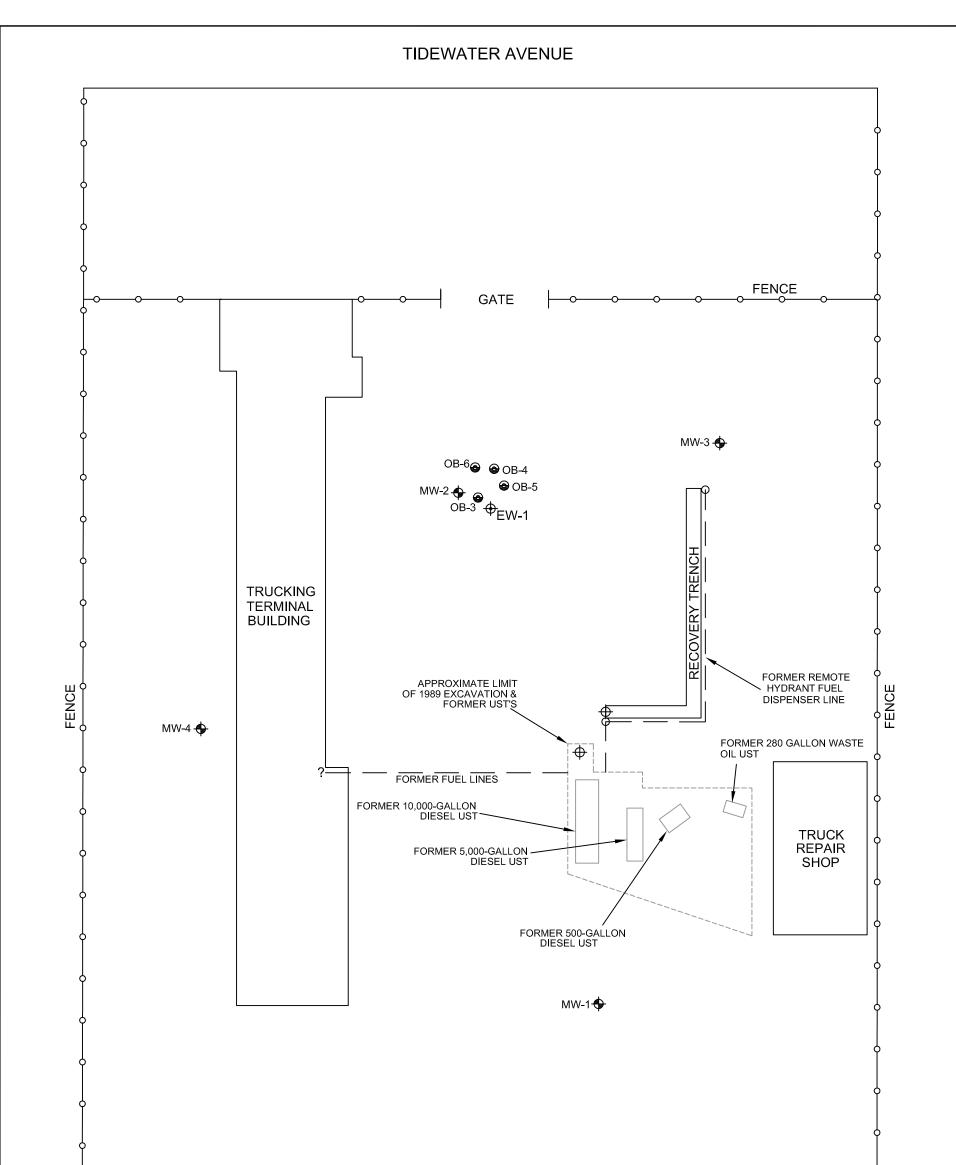
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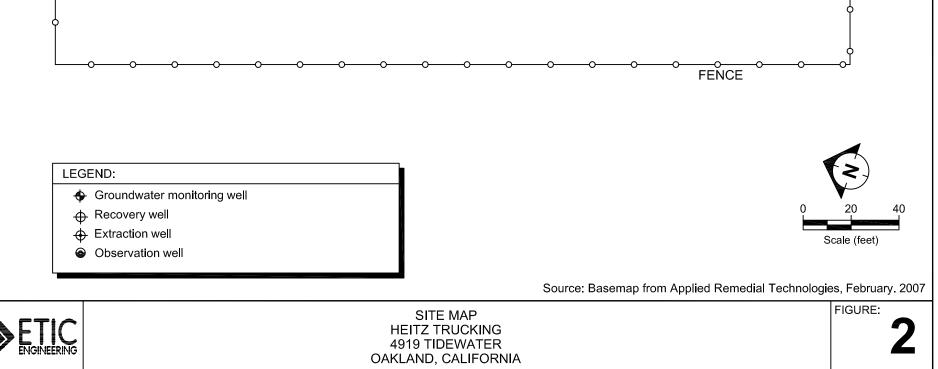
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Figures

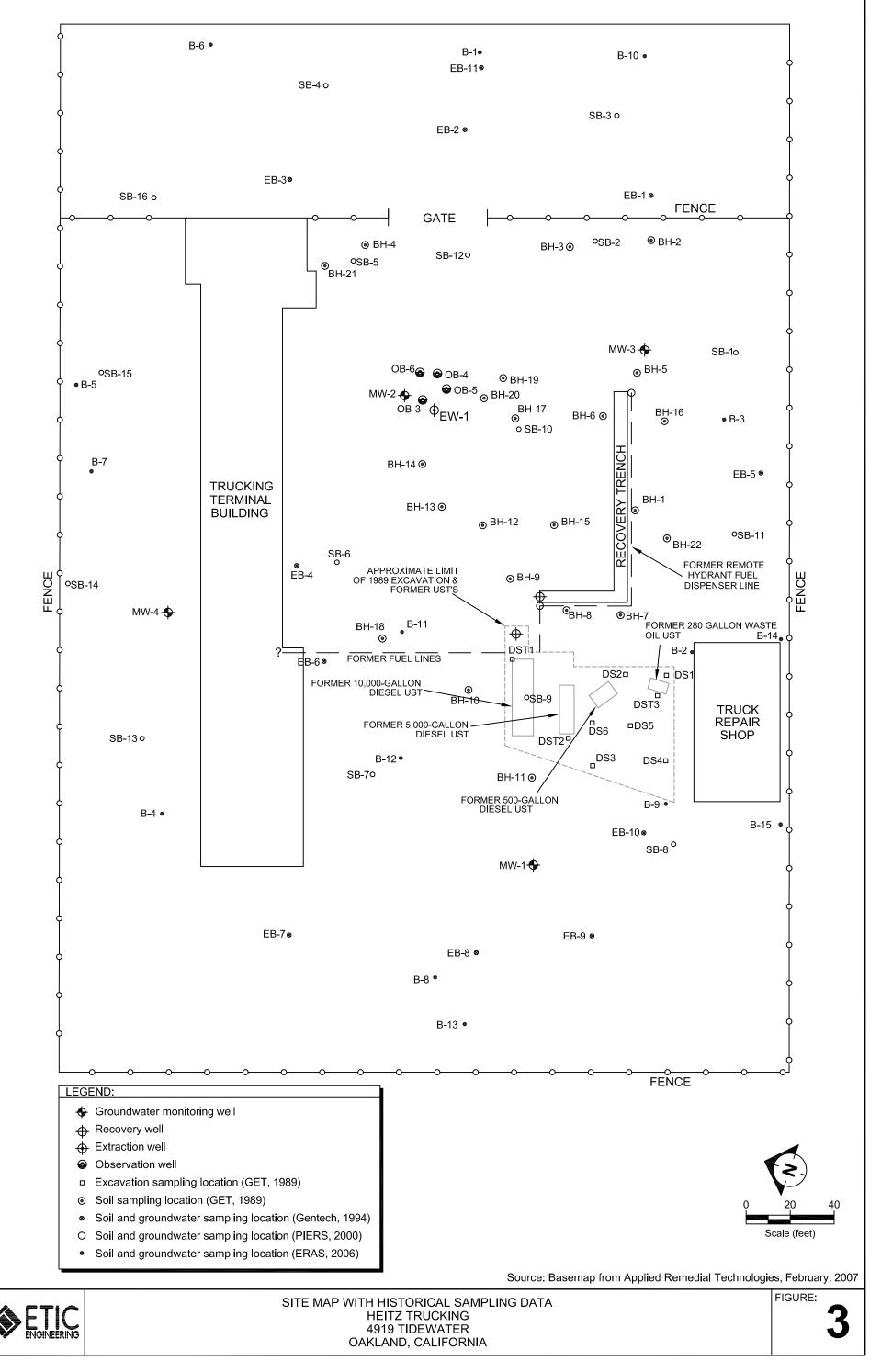


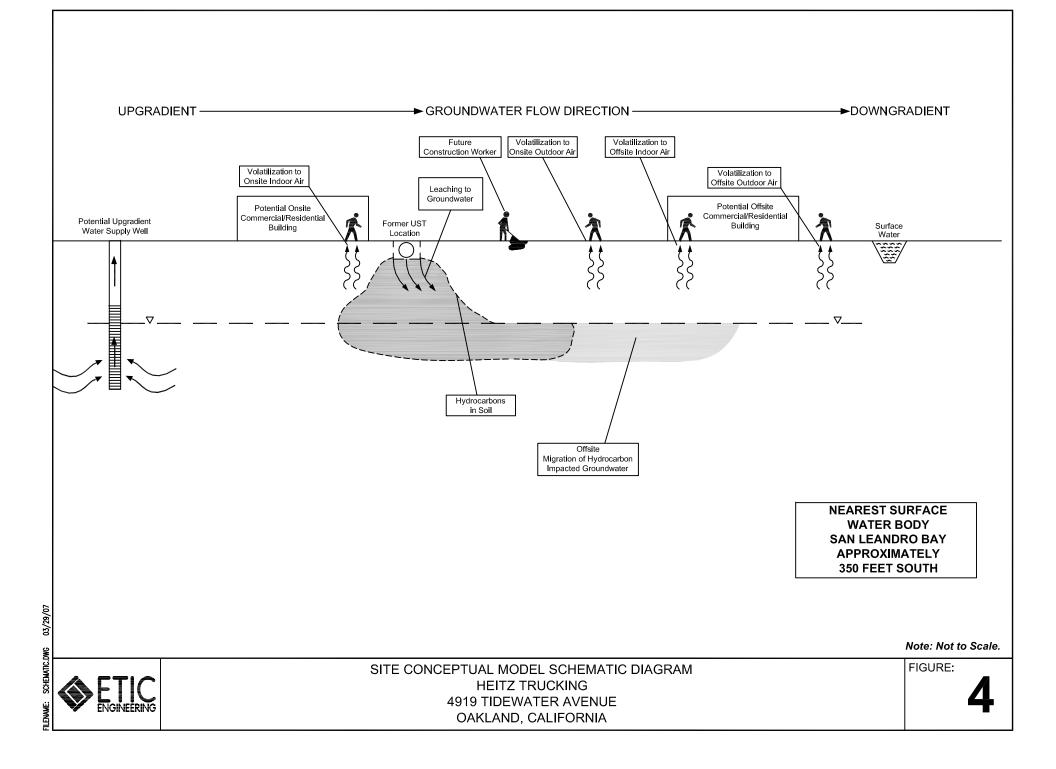
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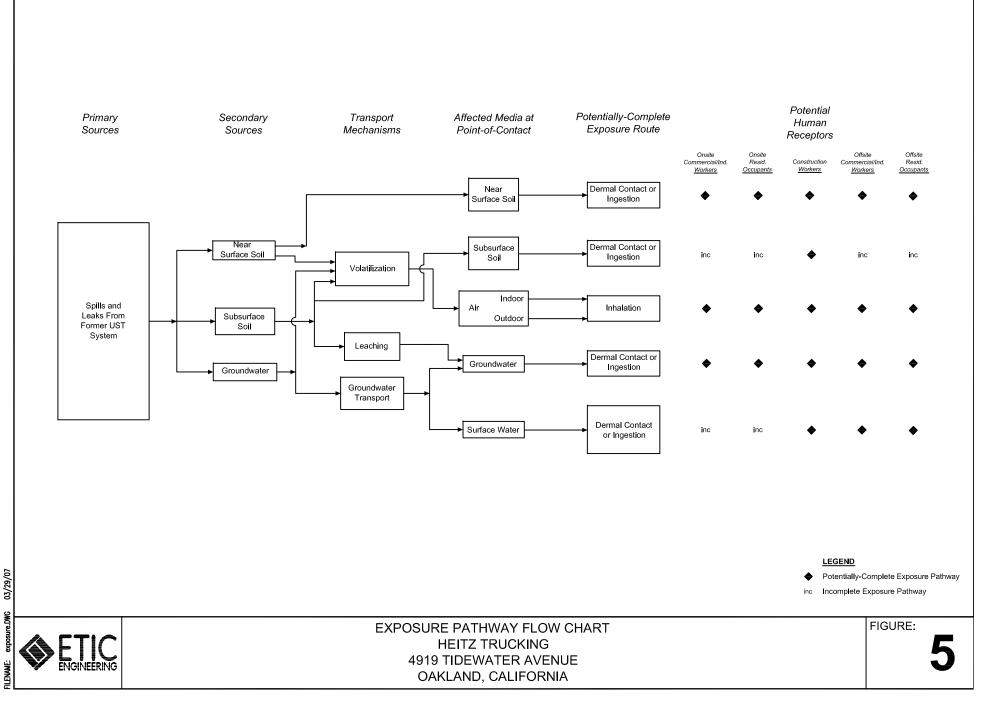




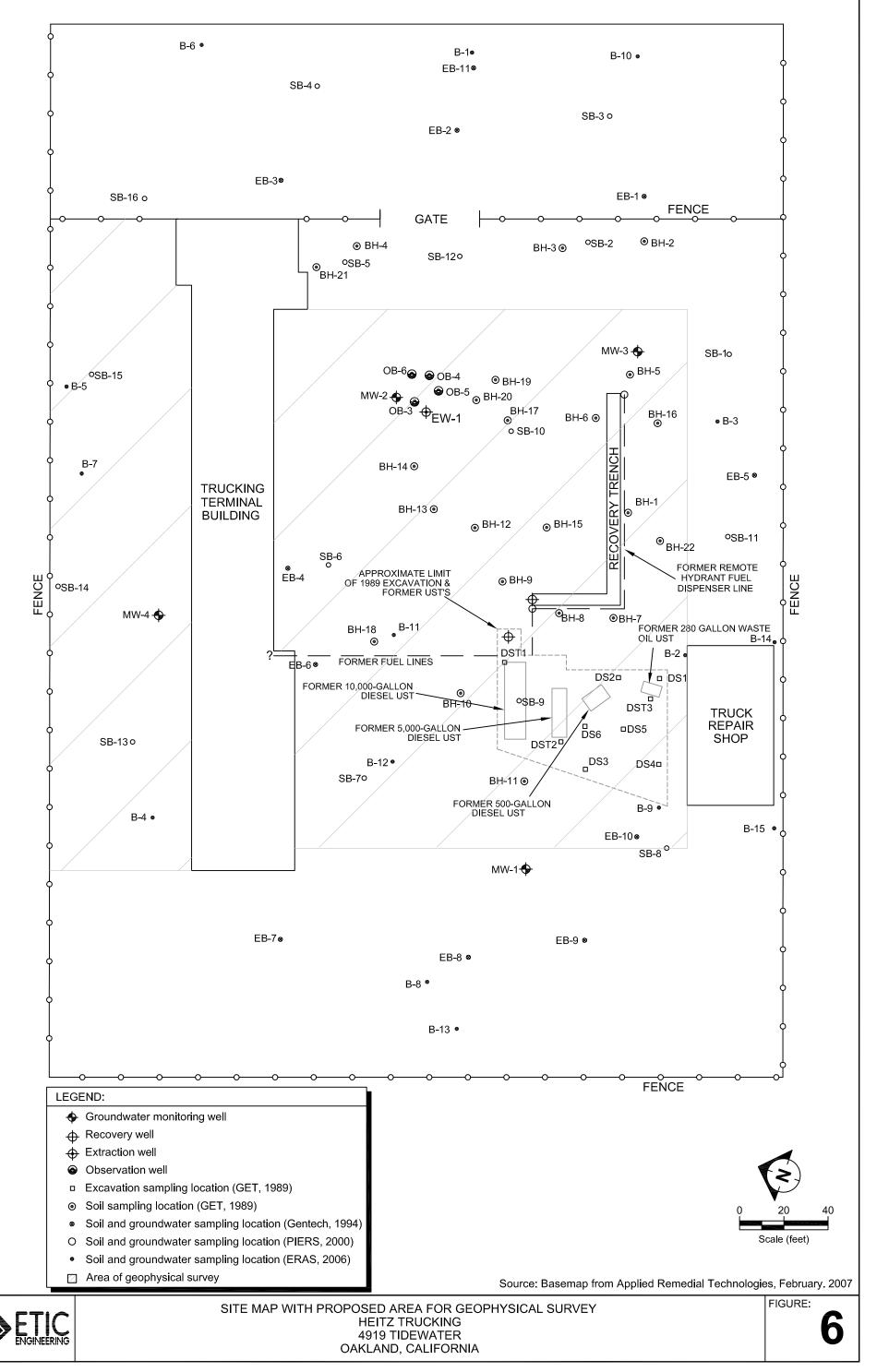
TIDEWATER AVENUE



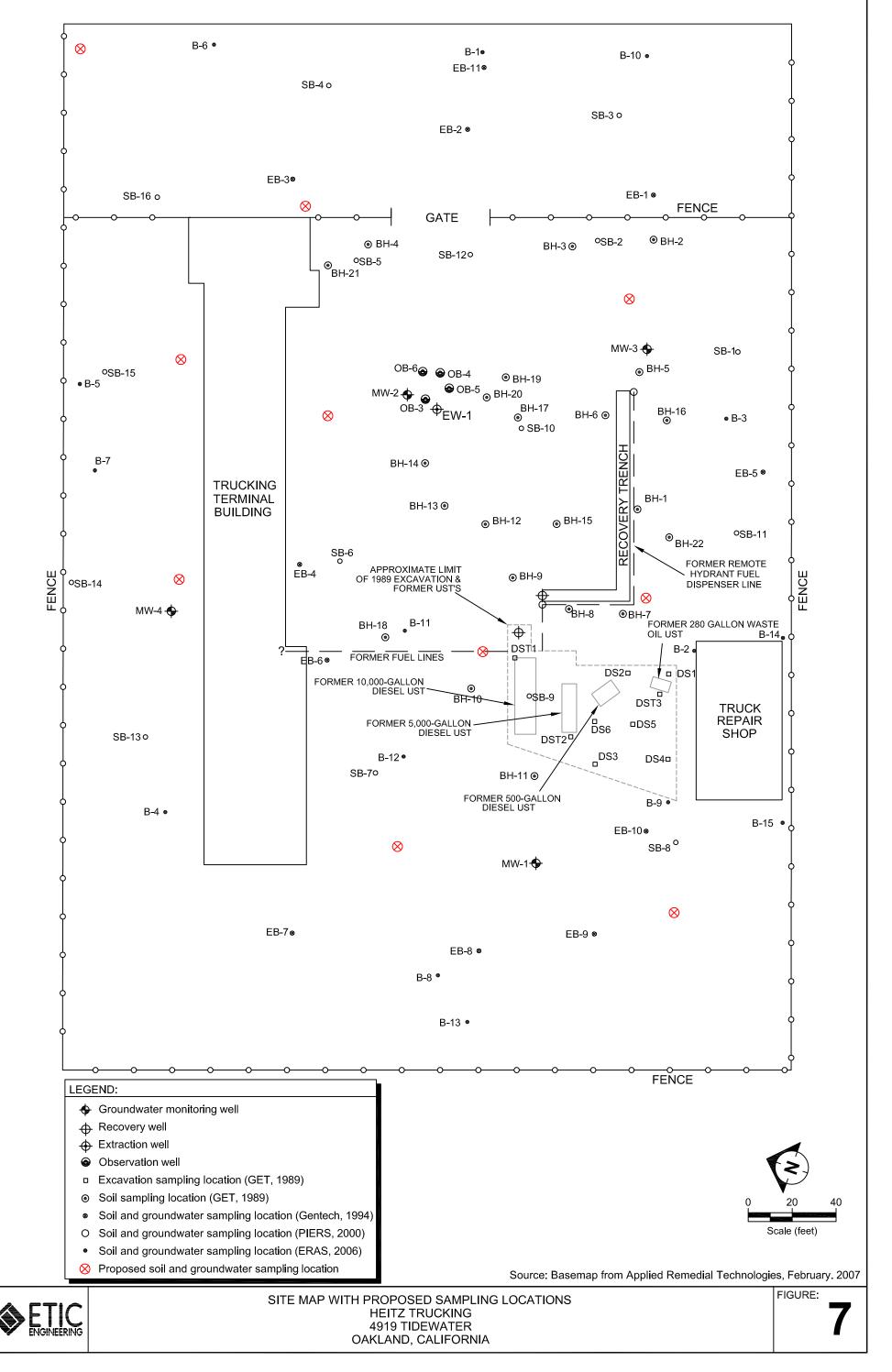




TIDEWATER AVENUE



TIDEWATER AVENUE



Tables

Table 1 Monitoring Well Construction Data Heitz Trucking 4919 Tidewater Avenue Oakland, California 94601

Monitoring Well	Date Installed	Top of Casing Elevation (feet msl)	Casing Material	Boring Depth (feet)	Well Depth (feet)	Boring Diameter (inches)	Casing Diameter (inches)	Slot Size (inches)	Screened Interval (feet)	Filter Pack Interval (feet)	Filter Pack Material
MW-1	4/8/1994	2.68	Sch. 40 PVC	8	8	NDA	2	0.020	3-8	2.5-8	#2/12 Sand
MW-2	4/1994	3.50	Sch. 40 PVC	8	8	NDA	2	0.02	3-8	2.5-8	#2/12 Sand
MW-3	4/8/1994	2.90	Sch. 40 PVC	8	8	NDA	2	0.020	3-8	2.5-8	#2/12 Sand
MW-4	7/19/1995	3.87	Sch. 40 PVC	8	8	NDA	2	0.020	3-8	2.5-8	#2/12 Sand
OB3	4/7/2006	NDA	Sch. 40 PVC	8	8	8	2	0.020	2-7	1.5-7	#2/12 Sand
OB4	4/7/2006	NDA	Sch. 40 PVC	NDA	10	8	2	0.020	2.5-10	2-10	#2/12 Sand
OB5	4/7/2006	NDA	Sch. 40 PVC	NDA	15	NDA	2	0.020	10-15	8.5-15	#2/12 Sand
OB6	4/7/2006	NDA	Sch. 40 PVC	NDA	7.5	8	2	0.020	2-6.5	1-6.5	#2/12 Sand
EW1	4/14/2006	NDA	Sch. 40 PVC	11.5	11.5	36	8	0.032	NDA	NDA	#2/12 Sand-1/4" gravel mix

Notes:

Sch. 40 PVC = Schedule 40 polyvinyl chloride.

msl = Mean sea level.

NDA = No data available.

Table 2Groundwater Elevation DataHeitz Trucking4919 Tidewater AvenueOakland, California 94601

Monitoring Well	0 0 0		Depth to Water (feet bgs)	Free Product Thickness (feet)	Groundwater Elevation (feet msl)
MW-1	4/14/1994	2.68	1.26	NDA	1.42
MW-1	11/17/1994	2.68	3.88	NDA	-1.20
MW-1	8/13/1995	2.68	3.09	NDA	-0.41
MW-1	8/23/1999	2.68	2.17	NDA	0.51
MW-1	5/26/1999	2.68	2.29	NDA	0.39
MW-1	4/26/2001	2.68	1.14	NDA	1.54
MW-1	9/5/2002	2.68	2.15	NDA	0.53
MW-1	8/18/2005	2.68	2.54	0	0.14
MW-1	8/19/2005	2.68	6.1	0	-3.42
MW-1	1/25/2006	2.68	2.02	0	0.66
MW-1	5/9/2006	2.68	0.30	0.00	2.38
MW-1	7/12/2006	2.68	1.81	0.00	0.87
MW-1	6/27/2007	2.68	1.82	0.00	0.86
MW-2	4/14/1994	3.50	1.92	NDA	1.58
MW-2	11/18/1994	3.50	1.78	NDA	1.72
MW-2	8/13/1995	3.50	2.95	NDA	0.55
MW-2	8/23/1999	3.50	2.89	NDA	0.61
MW-2	5/26/1999	3.50	2.96	NDA	0.54
MW-2	4/26/2001	3.50	1.74	NDA	1.76
MW-2	9/5/2002	3.50	3.06	NDA	0.44
MW-2	8/18/2005	3.50	2.62	0	0.88
MW-2	8/19/2005	3.50	2.62	0	0.88
MW-2	1/25/2006	3.50	1.27	0	2.23
MW-2	7/12/2006	3.50	2.42	0.00	1.08
MW-2	6/27/2007	3.50	2.46	0.00	1.04
MW-3	4/14/1994	2.90	1.33	NDA	1.57

Table 2Groundwater Elevation DataHeitz Trucking4919 Tidewater AvenueOakland, California 94601

Monitoring Well	Gauging Date	Top of Casing Elevation (feet msl)	Depth to Water (feet bgs)	Free Product Thickness (feet)	Groundwater Elevation (feet msl)
MW-3	11/18/1994	2.90	1.23	NDA	1.67
MW-3	8/13/1995	2.90	2.18	NDA	0.72
MW-3	8/23/1999	2.90	2.18	NDA	0.72
MW-3	5/26/1999	2.90	2.50	NDA	0.40
MW-3	4/26/2001	2.90	1.29	NDA	1.61
MW-3	9/5/2002	2.90	2.34	NDA	0.56
MW-3	8/18/2005	2.90	2.08	0.04	0.85
MW-3	8/19/2005	2.90	2.10	0.03	0.82
MW-3	1/25/2006	2.90	0.97	0	1.93
MW-3	7/12/2006	2.90	1.82	0.00	1.08
MW-3	6/27/2007	2.90	1.90	0.00	1.00
MW-4	8/13/1995	3.87	3.33	NDA	0.54
MW-4	5/26/1999	3.87	3.31	NDA	0.56
MW-4	4/26/2001	3.87	1.69	NDA	2.18
MW-4	9/5/2002	3.87	3.31	NDA	0.56
MW-4	8/18/2005	3.87	3.37	0	0.50
MW-4	8/19/2005	3.87	3.46	0	0.41
MW-4	1/25/2006	3.87	2.50	0	1.37
MW-4	7/12/2006	3.87	3.09	0.00	0.78
MW-4	6/27/2007	3.87	3.26	0.00	0.61

Notes:

msl = Mean sea level.

bgs = Below ground surface.

NDA - No data available

Table 3Analytical Data for Monitoring Well Groundwater SamplesTPH-d, TPH-g, BTEX, and MTBEHeitz Trucking4919 Tidewater AvenueOakland, California 94601

Monitoring Well	Sampling Date	TPH-d (µg/L)	TPH-g (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)
MW-1	4/14/1994	<50	<50	<0.5	< 0.5	<0.5	< 0.5	NA
MW-1	11/17/1994	<50	<50	< 0.3	< 0.3	<0.3	< 0.3	NA
MW-1	8/13/1995	<50	<50	< 0.5	< 0.5	<0.5	< 0.5	NA
MW-1	5/26/1999	<50	60	0.6	< 0.5	0.8	1.9	< 0.50
MW-1	8/23/1999	<50	NA	< 0.5	< 0.5	<0.5	< 0.5	NA
MW-1	10/16/2000	150	<50	< 0.5	< 0.5	<0.5	< 0.5	NA
MW-1	4/26/2001	1,300	<50	< 0.5	< 0.5	<0.5	< 0.5	NA
MW-1	9/5/2002	<50	NA	< 0.5	< 0.5	<0.5	<1	9.8
MW-1	8/18/2005	410^{1}	<50	<1	<1	<1	<1	6.0
MW-1	1/25/2006	$3,600^2$	<50	2.3	< 0.5	<0.5	1.2	11.0
MW-1	7/12/2006	100	<50	< 0.5	< 0.5	<0.5	<1	6.2
MW-1	6/27/2007	<50	<50	< 0.50	< 0.50	< 0.50	< 0.50	4.4
MW-2	4/14/1994			Not san	pled due to fi	ree product.		
MW-2	11/17/1994	28,000	<50	< 0.5	< 0.5	<0.5	< 0.5	NA
MW-2	8/13/1995	180	<50	< 0.5	< 0.5	<0.5	< 0.5	NA
MW-2	5/26/1999	120	<50	< 0.5	< 0.5	<0.5	< 0.5	<50
MW-2	8/23/1999	61	NA	< 0.5	< 0.5	<0.5	< 0.5	NA
MW-2	10/16/2000	3,400	570	< 0.5	< 0.5	<0.5	< 0.5	NA
MW-2	4/26/2001	57,000	2,400	< 0.5	< 0.5	<0.5	< 0.5	NA
MW-2	9/5/2002	27,100	NA	< 0.5	< 0.5	<0.5	<1	5.1
MW-2	8/18/2005	13,300	<50	<10	<10	<10	<10	<30
MW-2	1/25/2006	110,000 ²	1,200	<10	<10	<10	<20	<10
MW-2	7/12/2006	5,900	330	< 0.5	< 0.5	<0.5	<1	3.6
MW-2	6/27/2007	10,000	200	< 0.50	< 0.50	< 0.50	< 0.50	1.8
MW-3	4/14/1994	7,700	250	<0.5	<0.5	<0.5	1.2	NA
MW-3	11/17/1994	160,000	<50	<0.5	<0.5	<0.5	< 0.5	NA
MW-3	8/13/1995	1,500	<50	<0.5	<0.5	<0.5	< 0.5	NA
MW-3	5/26/1999	1,100	160	1.6	1.1	16	54.00	< 0.50
MW-3	8/23/1999	84	NA	<0.5	<0.5	<0.5	< 0.5	NA
MW-3	10/16/2000	42,000	130	0.52	<0.5	<0.5	< 0.5	NA
MW-3	4/26/2001	21,000	310	< 0.5	<0.5	<0.5	< 0.5	NA

Table 3Analytical Data for Monitoring Well Groundwater SamplesTPH-d, TPH-g, BTEX, and MTBEHeitz Trucking4919 Tidewater AvenueOakland, California 94601

Monitoring Well	Sampling Date	TPH-d (µg/L)	TPH-g (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)
MW-3	9/5/2002	1,990	NA	< 0.5	< 0.5	<0.5	<1	31.1
MW-3	8/18/2005			Not san	pled due to fi	ree product.		
MW-3	1/25/2006	21,000 ²	440	<2.5	<2.5	<2.5	<5.0	29
MW-3	7/12/2006	16,000	280	< 0.5	< 0.5	<0.5	<1	47
MW-3	6/27/2007	2,600	140	< 0.50	< 0.50	<0.50	< 0.50	25
MW-4	8/13/1995	<50	450	2.1	0.7	4.1	13	NA
MW-4	5/26/1999	100	600	0.7	< 0.5	<0.5	5.8	< 0.5
MW-4	8/23/1999	180	NA	< 0.5	< 0.5	<0.5	< 0.5	NA
MW-4	10/16/2000	75,000	890	< 0.5	< 0.5	<0.5	11	NA
MW-4	4/26/2001	24,000	2,100	< 0.5	< 0.5	<0.5	< 0.5	NA
MW-4	9/5/2002	17,000	NA	< 0.5	< 0.5	<0.5	<1	1.2
MW-4	8/18/2005	6,200	<50	<1	<1	<1	<1	<3
MW-4	1/25/2006	8,200	110	2.0	0.87	<0.5	2.3	4.5
MW-4	7/12/2006	5,200	250	< 0.5	< 0.5	<0.5	<1	0.93
MW-4	6/27/2007	320	<50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50
Travel Blank	6/27/2007	NA	<50	< 0.50	< 0.50	<0.50	< 0.50	< 0.50
	RWQCB ESLs	640	500	46	130	290	100	1,800
Title	22 CCR MCLs	NE	NE	1	150	300	1,750	13

Notes:

TPH-d = Total petroleum hydrocarbons quantified as diesel.

TPH-g = Total petroleum hydrocarbons quantified as gasoline.

MTBE = Methyl tertiary butyl ether.

 $\mu g/L = Micrograms$ per liter.

NA = Not analyzed.

NE = Not established.

- <50 = Analyte not detected above the laboratory method reporting limit indicated.
- 1. Chromatogram does not resemble the typical diesel pattern.
- 2. TPH-d sample collected on 2/2/2006.

RWQCB ESLs - San Francisco Bay Regional Water Quality Control Board Environmental Screening Levels for groundwater that is not a current or potential source of drinking water (February 2005).

Title 22 CCR MCLs - Title 22 California Code of Regulations Maximum Contaminant Levels (June 2004).

Sampling Location	Sample ID	Sampling Date	Depth (feet bgs)	TPH-d (mg/kg)	TPH-g (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	Total O&G (mg/kg)	TPH-WO (mg/kg)
Excavation											
DST 1	DST-1	3/16/1989	9.0	240	NA	NA	NA	NA	NA	NA	NA
DST 2	DST-2	3/16/1989	8.0	110	NA	NA	NA	NA	NA	NA	NA
DST 3	DST-3	3/16/1989	29 inches	110	NA	NA	NA	NA	NA	15	NA
DS-1	DS-1	3/16/1989	6.0	<3	NA	<.02	<.02	<0.1	<.04	29	NA
DS-2	DS-2	3/24/1989	6.0	<3	NA	<.02	<.02	<0.1	<.04	59	NA
DS-3	DS-3	3/24/1989	7.0	<3	NA	<.02	<.02	<0.1	<.04	NA	NA
DS-4	DS-4	3/24/1989	7.0	64	NA	<.02	<.02	<0.1	<.04	NA	NA
DS-5	DS-5	3/24/1989	8.0	<3	NA	<.02	<.02	<0.1	<.04	NA	NA
DS-6	DS-6	3/24/1989	8.0	<3	NA	<.02	<.02	<0.1	<.04	NA	NA
Line samples											
SB1	Unknown	7/19/1995	4.0	34.0	NA	ND	ND	ND	ND	NA	NA
SB2	Unknown	7/19/1995	4.0	ND	NA	ND	ND	ND	ND	NA	NA
Borings											
 BH-4	LS-1	5/1/1989	6.0	<3	NA	NA	NA	NA	NA	NA	NA
BH-3	LS-2	5/1/1989	6.0	<3	NA	NA	NA	NA	NA	NA	NA
BH-6	LS-4	5/1/1989	3.5	3,000	NA	NA	NA	NA	NA	NA	NA
BH-7	LS-6	5/2/1989	6.0	40	NA	NA	NA	NA	NA	NA	NA

Sampling Location	Sample ID	Sampling Date	Depth (feet bgs)	TPH-d (mg/kg)	TPH-g (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	Total O&G (mg/kg)	TPH-WO (mg/kg)
BH-10	LS-9	5/3/1989	4.25	460	NA	NA	NA	NA	NA	NA	NA
BH-11	LS-10	5/3/1989	5.0	46,000	NA	NA	NA	NA	NA	27,000	NA
BH-13	LS-11	5/3/1989	4.0	420	NA	NA	NA	NA	NA	NA	NA
BH-14	LS-12	5/3/1989	4.5	260	NA	NA	NA	NA	NA	NA	NA
BH-16	LS-16	5/4/1989	3-3.25	<3	NA	NA	NA	NA	NA	NA	NA
BH-18	LS-18	5/4/1989	3.75-4	<3	NA	NA	NA	NA	NA	NA	NA
BH-21	LS-21	5/5/1989	4.3	<3	NA	NA	NA	NA	NA	NA	NA
BH-22	LS-22	5/5/1989	3.3	<3	NA	NA	NA	NA	NA	NA	NA
MW-1	MW#1@C/F	4/7/1994	3.0	4.4	ND	ND	ND	ND	ND	<50	NA
MW-2	MW#2@C/F	4/7/1994	2.0	29,000	ND	ND	ND	ND	ND	36,000	NA
MW-3	MW#3@C/F	4/7/1994	2.0	150	250	0.180	ND	2.1	2.0	<50	NA
EB-3	EB#3@C/F	4/7/1994	2.0	<1	ND	ND	ND	ND	ND	<50	NA
EB-5	EB#5@C/F	4/7/1994	2-2.5	<5	ND	ND	ND	ND	ND	180	NA
EB-6	EB#6@C/F	4/7/1994	2-2.5	2.5	ND	ND	ND	ND	ND	<50	NA
EB-8	EB#8@C/F	4/7/1994	3-3.5	<1	ND	ND	ND	ND	ND	<50	NA
EB-11*	EB#11@C/F	4/7/1994	2-2.5	7.5	ND	ND	ND	ND	ND	<50	NA
MW4	Unknown	7/19/1995	4.0	<1	NA	<.005	<.005	<.005	<.005	NA	NA
MW4	Unknown	7/19/1995	8.0	<1	NA	<.005	<.005	<.005	<.005	NA	NA
SB-2	Unknown	12/20/2000	6.0	<10	NA	NA	NA	NA	NA	NA	NA

Sampling Location	Sample ID	Sampling Date	Depth (feet bgs)	TPH-d (mg/kg)	TPH-g (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	Total O&G (mg/kg)	TPH-WO (mg/kg)
SB-5	Unknown	12/20/2000	6.5	<10	NA	NA	NA	NA	NA	NA	NA
SB-6	Unknown	12/20/2000	7.0	<10	NA	NA	NA	NA	NA	NA	NA
SB-10	Unknown	12/20/2000	6.0	<10	NA	NA	NA	NA	NA	NA	NA
SB-12	Unknown	12/20/2000	6.5	<10	NA	NA	NA	NA	NA	NA	NA
SB-14	Unknown	12/20/2000	7.0	<10	NA	NA	NA	NA	NA	NA	NA
SB-15	Unknown	12/20/2000	6.0	<10	NA	NA	NA	NA	NA	NA	NA
SB-16	Unknown	12/20/2000	6.5	14	NA	NA	NA	NA	NA	NA	NA
B-1	B-1,2.75-3	2/24/2006	2.75	1.9	NA	NA	NA	NA	NA	NA	NA
B-2	B-2,3.5-3.75	2/24/2006	3.5	4,700	NA	NA	NA	NA	NA	NA	NA
B-2	B-2,7-7.25	2/24/2006	7.0	1,100	NA	NA	NA	NA	NA	NA	NA
B-3	B-3,2.75-3	2/24/2006	2.75	74	NA	NA	NA	NA	NA	NA	NA
B-3	B-3,7-7.25	2/24/2006	7.0	6.0	NA	NA	NA	NA	NA	NA	NA
B-4	B-4,5-5.25	2/24/2006	5.0	< 0.99	NA	NA	NA	NA	NA	NA	NA
B-5	B-5,5-5.25	2/24/2006	5.0	< 0.99	NA	NA	NA	NA	NA	NA	NA
B-5	B-5,6.75-7	2/24/2006	6.75	<0.99	NA	NA	NA	NA	NA	NA	NA
B-6	B-6,4-4.5	2/27/2006	4.0	3.6	NA	NA	NA	NA	NA	NA	NA
B-6	B-6,6-6.25	2/27/2006	6.0	4.8	NA	NA	NA	NA	NA	NA	NA
B-7	B-7,4-4.5	2/27/2006	4.0	<0.99	NA	NA	NA	NA	NA	NA	NA
B-7	B-7,6-6.25	2/27/2006	6.0	14	NA	NA	NA	NA	NA	NA	NA
B-8	B-8,3-3.5	2/27/2006	3.0	<1.0	NA	NA	NA	NA	NA	NA	NA
B-8	B-4.5-5	2/27/2006	4.5	1.6	NA	NA	NA	NA	NA	NA	NA

Sampling Location	Sample ID	Sampling Date	Depth (feet bgs)	TPH-d (mg/kg)	TPH-g (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	Total O&G (mg/kg)	TPH-WO (mg/kg)
B-9	B-9,4.5-5	2/27/2006	4.5	5,400	NA	NA	NA	NA	NA	NA	NA
B-9	B-9,10-10.25	2/27/2006	10.0	4.7	NA	NA	NA	NA	NA	NA	NA
OB-5	OB-5,11-1.5	4/7/2006	11.0	1.9 (4.3)	NA	NA	NA	NA	NA	NA	NA
B-10	B-10,4.5-5	4/12/2006	4.5	<1.0 (<1.0)	NA	NA	NA	NA	NA	NA	NA
B-10	B-10,9.5-10	4/12/2006	9.5	<0.99 (<0.99)	NA	NA	NA	NA	NA	NA	NA
B-11	B-11,4.5-5	4/12/2006	4.5	2,900 (3,000)	NA	NA	NA	NA	NA	NA	NA
B-11	B-11,8.5-8.75	4/12/2006	8.5	1.2	NA	NA	NA	NA	NA	NA	NA
B-11	B-11	4/12/2006	8.5	0.69** (0.89)	NA	NA	NA	NA	NA	NA	NA
B-11	B-11,8.75-9	4/12/2006	8.75	<0.99 (<0.99)	NA	NA	NA	NA	NA	NA	NA
B-12	B-12,2.5-2.75	4/12/2006	2.5	990	NA	NA	NA	NA	NA	NA	NA
B-12	B-12	4/12/2006	2.5	5.1** (2.8)	NA	NA	NA	NA	NA	NA	NA
B-12	B-12,2.75-3	4/12/2006	2.75	1,100 (1,300)	NA	NA	NA	NA	NA	NA	NA
B-12	B-12,7.5-8	4/12/2006	7.5	<0.99 (<1.0)	NA	NA	NA	NA	NA	NA	NA
B-13	B-13,4-4.5	4/12/2006	4.0	<0.99 (<0.99)	NA	NA	NA	NA	NA	NA	NA
B-14	B-14,4-4.5	4/12/2006	4.0	92 (73)	NA	NA	NA	NA	NA	NA	NA
B-14	B-14,7.5-8	4/12/2006	7.5	2.5 (1.9)	NA	NA	NA	NA	NA	NA	NA
B-15	B-15,8-8.5	4/12/2006	8.0	<0.99 (<1.0)	NA	NA	NA	NA	NA	NA	NA
Location unknow	<u>m</u>										
Unknown	DS-1	6/20/1989	Unk	<20	NA	0.092	<.05	<.05	1.456	NA	NA

Sampling Location	Sample ID	Sampling Date	Depth (feet bgs)	TPH-d (mg/kg)	TPH-g (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	Total O&G (mg/kg)	TPH-WO (mg/kg)
Unknown	DS-2	6/20/1989	Unk	4,310	NA	<.05	<.05	0.19	0.645	NA	NA
Unknown	DS-3	6/20/1989	Unk	1,690	NA	<.05	<.05	<.05	0.284	NA	NA
Unknown	DS-4	6/20/1989	Unk	420	NA	0.197	<.05	<.05	<.05	NA	NA
Unknown	WOP-1	3/24/1989	Unk	<3,000	NA	<.02	<.02	<.03	<.02	NA	<10,000
Unknown	WOP-2	3/24/1989	Unk	<3,000	NA	<.02	<.02	<.03	<.02	NA	<10,000
Unknown	TANK 4	3/27/1989	Unk	<3	<500	<.03	<.03	< 0.1	<.05	NA	NA

Notes:

TPH-d = Total petroleum hydrocarbons quantified as diesel. Results with silica gell cleanup in parentheses.

TPH-g = Total petroleum hydrocarbons quantified as gasoline.

MTBE = Methyl tertiary butyl ether by EPA Method 8020, with confirmation by EPA Method 8260B.

O & G = Oil and Grease

TPH-WO = Total petroleum hydrocarbons quantified as waste oil

<50 = Analyte not detected above the laboratory method reporting limit indicated.

ND = Analyte not detected above the laboratory method reporting limit.

NA = Not Analyzed

Unk = Unknown sample depth

* = Report as CB in oil and grease results by laboratory

** = Soluble Threshold limit concentration results in milligrams per liter

Sample Location	Sample ID	Sampling Date	TPH-d (µg/L)	TPH-g (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	O & G (µg/L)	VOC (µg/L)
BH-2	WS-1	5/2-3/89	<80	NA	NT A	NA	NA	NA	NA	NA
					NA					
Unknown	WS-1	5/16/1989	NA	NA	110	41	1,000	120	NA	8,000
Unknown	WS-2	5/16/1989	690,000	NA	NA	NA	NA	NA	NA	NA
Unknown	WWOP-1	5/24/1989	<100	NA	<2	120	260	3,300	36,000	ND
EB-1	EB-1GWS	4/7/1994	240	ND	ND	ND	ND	ND	4,000	NA
EB-2	EB-2GWS	4/7/1994	64,000	2,500	ND	1.2	ND	ND	100,000	NA
EB-3	EB-3GWS	4/7/1994	330	ND	ND	ND	ND	ND	4,000	NA
EB-4	EB-4GWS	4/7/1994	73,000	200	200	ND	0.80	4.4	38,000	NA
EB-5	EB-5GWS	4/7/1994	<50	ND	ND	ND	ND	ND	4,000	NA
EB-6	EB-6GWS	4/7/1994	650	ND	ND	ND	ND	ND	4,000	NA
EB-7	EB-7GWS	4/7/1994	<50	ND	ND	ND	ND	ND	4,000	NA
EB-8	EB-8GWS	4/7/1994	<50	ND	ND	ND	ND	ND	4,000	NA
EB-9	EB-9GWS	4/7/1994	<50	ND	ND	ND	ND	ND	4,000	NA
EB-10	EB-10GWS	4/7/1994	220	ND	ND	ND	ND	ND	3,400	NA
EB-11	EB-11GWS	4/7/1994	290	ND	ND	ND	ND	ND	ND	NA
SB-1	SB1-GW	12/20/2000	<100	NA	NA	NA	NA	NA	NA	NA
SB-2	SB2-GW	12/20/2000	26,000	NA	NA	NA	NA	NA	NA	NA
SB-3	SB3-GW	12/20/2000	<100	NA	NA	NA	NA	NA	NA	NA
SB-4	SB4-GW	12/20/2000	<100	NA	NA	NA	NA	NA	NA	NA
SB-5	SB5-GW	12/20/2000	110,000	NA	NA	NA	NA	NA	NA	NA
SB-6	SB6-GW	12/20/2000	230,000	NA	NA	NA	NA	NA	NA	NA

Sample Location	Sample ID	Sampling Date	TPH-d (µg/L)	TPH-g (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	O & G (µg/L)	VOC (µg/L)
SB-7	SB7-GW	12/20/2000	<100	NA	NA	NA	NA	NA	NA	NA
SB-8	SB8-GW	12/20/2000	<100	NA	NA	NA	NA	NA	NA	NA
SB-9	SB9-GW	12/20/2000	<100	NA	NA	NA	NA	NA	NA	NA
SB-10	SB10-GW	12/20/2000	670,000	NA	NA	NA	NA	NA	NA	NA
SB-11	SB11-GW	12/20/2000	<100	NA	NA	NA	NA	NA	NA	NA
SB-12	SB12-GW	12/20/2000	190,000	NA	NA	NA	NA	NA	NA	NA
SB-13	SB13-GW	12/20/2000	<100	NA	NA	NA	NA	NA	NA	NA
SB-14	SB14-GW	12/20/2000	44,000	NA	NA	NA	NA	NA	NA	NA
SB-15	SB15-GW	12/20/2000	48,000	NA	NA	NA	NA	NA	NA	NA
SB-16	SB16-GW	12/20/2000	2,000	NA	NA	NA	NA	NA	NA	NA
B-1	B-1	2/24/2006	2,000	NA	NA	NA	NA	NA	NA	NA
B-2	B-2	2/24/2006	12,000	NA	NA	NA	NA	NA	NA	NA
B-3	B-3	2/24/2006	2,400	NA	NA	NA	NA	NA	NA	NA
B-4	B-4	2/24/2006	910	NA	NA	NA	NA	NA	NA	NA
B-5	B-5	2/24/2006	490	NA	NA	NA	NA	NA	NA	NA
B-6	B-6	2/24/2006	190	NA	NA	NA	NA	NA	NA	NA
B-7	B-7	2/24/2006	4,100	NA	NA	NA	NA	NA	NA	NA
B-8	B-8	2/24/2006	1,300	NA	NA	NA	NA	NA	NA	NA
B-9	B-9	2/24/2006	13,000	NA	NA	NA	NA	NA	NA	NA
B-10	B-10	4/12/2006	290 (<50)	NA	NA	NA	NA	NA	NA	NA
B-11	B-11	4/12/2006	1,800,000 (660,000)	NA	NA	NA	NA	NA	NA	NA

Sample Location	Sample ID	Sampling Date	TPH-d (µg/L)	TPH-g (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	O & G (µg/L)	VOC (µg/L)
			32,000,000							
B-12	B-12	4/12/2006	(2,500,000)	NA	NA	NA	NA	NA	NA	NA
B-13	B-13	4/12/2006	1,100 (130)	NA	NA	NA	NA	NA	NA	NA
B-14	B-14	4/12/2006	4,700 (560)	NA	NA	NA	NA	NA	NA	NA
B-15	B-15	4/12/2006	1,400 (320)	NA	NA	NA	NA	NA	NA	NA

Notes:

TPH-d = Total petroleum hydrocarbons quantified as diesel. Results with silica gell cleanup in parentheses.

TPH-g = Total petroleum hydrocarbons quantified as gasoline.

MTBE = Methyl tertiary butyl ether by EPA Method 8020, with confirmation by EPA Method 8260B.

O & G = Oil and Grease

VOC = Volatile Organic Compounds, no more specific information available in GenTech 24 March 1994.

<50 = Analyte not detected above the laboratory method reporting limit indicated.

ND = Analyte not detected above the laboratory method reporting limit indicated.

NA = Not Analyzed

Unknown - sample location not known.

290 (<50) = Second value in parentheses was analyzed with silica gel clean-up.

Appendix A

Regulatory Correspondence

ALAMEDA COUNTY HEALTH CARE SERVICES



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DAVID J. KEARS, Agency Director

AGENCY

May 29, 2007

Mr. Bob Lawlor RWL Investments, Inc. 4919 Tidewater Ave., Unit B Oakland, CA 94601-4914 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

Dear Mr. Lawlor:

Subject: Fuel Leak Case No. RO0000107 & Global ID T0600100451, Di Salvo Trucking, 4919 Tidewater Ave., Oakland 94601

Alameda County Environmental Health staff has received and reviewed the February 26, 2007 Feasibility Study Repor for the subject site prepared by Applied Remedial Technologies (ART). This study evaluates five remedial alternatives besides No Action. These were evaluated using a screening method which is consists of a weighted cumulative score based upon the ability of each alternative to achieve specific weighted criteria. The two highest scoring alternatives were groundwater extraction & treatment with limited excavation and site dewatering plus soil excavation and disposal. As you are aware, prior approval was given from our office for this latter alternative. Since the overall score of these remedial alternatives was similar, based upon the estimated cost for each remedial approach, ART recommends groundwater extraction & treatment with limited source area remediation. Our office concurs with the proposed remedial approach. We understand that alternatives other than excavation may be evaluated to remediate the TPH impacted soils. We request you address the following technical comments and submit the technical reports requested below.

TECHNICAL COMMENTS

- 1. Remedial Action Plan- Please submit your Remedial Action Plan (RAP) as requested below. We understand that it will consist of ten (10) extraction wells located within the area of MW-2 and the former tank pit. Please provide a more detailed figure indicating the well locations and their construction design and the design of the treatment system. Please describe how the affected soil area will be precisely determined and describe how the other remediation alternatives other than excavation will be evaluated. Will the fill and clay impacted soils be treated differently? Will the existing wells be monitored more frequently when the extraction system is operating? The current semi-annual monitoring will not be sufficient at that time. Describe your post-remediation soil and groundwater sampling plan.
- Groundwater Monitoring- Please continue the requested semi-annual monitoring at the site until the extraction system is in operation. Please be aware, we have not received your 1st 2007 Semi-Annual monitoring report.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health according to the following schedule:

- June 23, 2007- Remedial Action Plan
- June 23, 2007- 1st 2007 Semi-Annual Monitoring Report
- November 23, 2007- 2nd 2007 Semi-Annual Monitoring Report

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

Effective January 31, 2006, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic reporting).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at barney.chan@acgov.org.

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "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 my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 567-6765.

Sincerely.

Barres Millie

Barney M. Chan Hazardous Materials Specialist

cc; files, D. Drogos

Mr. Apri Ghuman, ART, 1485 Bayshore Blvd., Ste. 1, San Francisco, CA 94124 Mr. S. Ramdass, SWRCB Cleanup Fund, 1001 I St., P.O. Box 944212, Sacramento, CA, 94244

5_29_07 4919 Tidewater

From:	"Chan, Barney, Env. Health" <barney.chan@acgov.org></barney.chan@acgov.org>
То:	"Alan Anselmo" <aanselmo@eticeng.com></aanselmo@eticeng.com>
CC:	"Doug Oram" <dougoram@eticeng.com>, "Maura Dougherty" <mdougherty@eticen< th=""></mdougherty@eticen<></dougoram@eticeng.com>
Date:	8/21/2007 8:57 AM
Subject:	RE: Confirmation of Deadline Extension for Case No. RO0000107

Alan: Your request for RAP extension is again approved. Please be aware, as of August 27, 2007, I will no longer be the case worker for this site as I have transferred to the CUPA program within ACEH. Please refer your future correspondences to Donna Drogos, 510-567-6721, LOP Supervisor.

Sincerely,

Barney M. Chan Hazardous Materials Specialist Alameda County Environmental Health 510-567-6765

-----Original Message-----From: Alan Anselmo [mailto:AAnselmo@eticeng.com] Sent: Friday, August 17, 2007 4:41 PM To: Chan, Barney, Env. Health Cc: Doug Oram; Maura Dougherty; Bob Lawlor Subject: RE: Confirmation of Deadline Extension for Case No. RO0000107

Hi Barney,

We would like to request a three week extension for submission of the Remedial Action Plan (RAP) for the site located at 4919 Tidewater Avenue in Oakland (Fuel Leak Case No. RO0000107)--the revised submission date to be Friday, September 14, 2007. We are in the process of preparing the RAP and are currently considering modifying the schedule proposed within the February 26, 2007 Feasibility Study Report prepared by Applied Remedial Technologies for the site, which indicated that groundwater remediation would be done prior to any proposed soil remediation. We are requesting the additional 3 weeks of time to fully review and understand the site data and prepare an appropriate remediation plan for addressing the soil impacts either prior to or concurrent with addressing the groundwater impacts. Additionally, we are evaluating conducting additional soil characterization activities at the site to help appropriately design the proper remedial approach.

Please respond to this email with your approval of this proposed deadline extension. Please contact Maura Dougherty of ETIC at (925) 602-4710 x 41 (mdougherty@eticeng.com) if you have any questions since I will be out of the office until September 4th.

Thanks,

Alan J. Anselmo, P.E. ETIC Engineering, Inc. 2285 Morello Avenue Pleasant Hill, CA 94523 Phone: (925) 602-4710 x19 Fax: (925) 602-4720

Email: aanselmo@eticeng.com

>>> "Chan, Barney, Env. Health" <barney.chan@acgov.org> 6/25/2007 10:15 >>> AM >>>

Your request for extensions for the Semi-annual monitoring report and Remedial Action Plan is approved.

Barney M. Chan Hazardous Materials Specialist Alameda County Environmental Health 510-567-6765

-----Original Message-----From: Alan Anselmo [mailto:AAnselmo@eticeng.com] Sent: Wednesday, June 13, 2007 5:51 PM To: Chan, Barney, Env. Health Cc: Doug Oram; Maura Dougherty; Bob Lawlor Subject: Confirmation of Deadline Extension for Case No. RO0000107

Hi Barney,

As discussed earlier today, ETIC Engineering, Inc. (ETIC) has been retained by Mr. Bob Lawlor of R.W.L. Investments, Inc. to respond to your letter addressed to Mr. Lawlor dated May 29, 2007 regarding Alameda County Health Care Services' (ACHCS) comments on the February 26, 2007 Feasibility Study Report prepared by Applied Remedial Technologies for the site located at 4919 Tidewater Avenue in Oakland (Fuel Leak Case No. R00000107). Within your May 29, 2007 letter, the following reports were requested according to the following schedule: (1) Remedial Action Plan by June 23, 2007; (2) 1st 2007 Semi-Annual Monitoring Report by June 23, 2007; and (3) 2nd 2007 Semi-Annual Monitoring Report by November 23, 2007.

As we discussed, based on the fact that the groundwater monitoring event for the 1st 2007 semi-annual period has not yet been completed (it's currently scheduled to be completed before June 30, 2007, which is the end of the 1st semi-annual period for 2007), ETIC requests that the deadline for submission of the monitoring report be extended to one month following the end of the semi-annual period. Additionally, ETIC requests that the deadline for submission of the Remedial Action Plan be extended by two months to allow ample time for completion of this report, including incorporation of the 1st 2007 semi-annual event data into the report.

Therefore, as we discussed earlier today, ETIC proposes the following revised report submission deadlines:

(1) Remedial Action Plan - deadline of August 24, 2007;

(2) 1st Semi-Annual Groundwater Monitoring Report - deadline of July 31, 2007; and

(3) 2nd Semi-Annual Groundwater Monitoring Report - deadline of January 31, 2008.

Please respond to this email with your approval of these proposed deadlines. Please let me know if you have any questions.

Regards,

Alan J. Anselmo, P.E. ETIC Engineering, Inc. 2285 Morello Avenue Pleasant Hill, CA 94523

Phone: (925) 602-4710 x19 Fax: (925) 602-4720

Email: aanselmo@eticeng.com