

Reisy

August 9, 2004

Mr. Donald Strough  
Strough Family Trust of 1983  
2 Sea View Avenue  
Piedmont, California 94611

Subject: Fuel Leak Case No. O0000134, Val Strough Chevrolet, 327 34<sup>th</sup> Street, Oakland, CA

Dear Mr. Strough:

Alameda County Health Care Services Agency (ACHCSA) staff has reviewed the June 25, 2004 *Dual Phase Extraction Pilot Test Report and Interim Remedial Action Plan* prepared by ETIC Engineering, Inc. (ETIC) for the referenced site. This document presents the findings of a recent dual phase extraction (DPE) pilot test and proposes site remediation using temporary DPE from wells MW-2 and MW-3 for source area cleanup which will be followed by natural attenuation for further hydrocarbon reduction. We concur with the recommended scope of work proposed in the June 25, 2004 report.

If you have any questions, I may be reached at (510) 567-6746.

Sincerely,

Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

cc: Katherine Brandt, ETIC Engineering, Inc. 1333 Broadway, Suite 1015, Oakland, CA 94612  
Donna Drogos  
File



July 27, 2004

Mr. Don Hwang  
Hazardous Materials Specialist  
Alameda County Health Care Services Agency  
1131 Harbor Bay Parkway  
Alameda, California 94502-6577

Alameda  
CORRES - L  
2004 - 07 - 27

**RE:** Former Val Strough Chevrolet  
327 34<sup>th</sup> Street, Oakland, California  
Fuel Leak Case No. RO0000134

Dear Mr. Hwang:

On behalf of Strough Family Trust of 1983, ETIC Engineering, Inc. (ETIC) has prepared this correspondence to request your expedited approval of the planned interim remedial action activities using dual phase extraction at the above-referenced site. These activities were described in the 25 June 2004 *Dual Phase Extraction Pilot Test Report and Interim Remedial Action Plan* (DPE Report and IRAP).

As summarized in recent reports, the primary sources (gasoline and used oil underground storage tanks [USTs] and associated dispenser) were removed in 1993, and, although separate phase hydrocarbons are intermittently observed in wells near the former tank locations, the hydrocarbon plume is stable to declining and largely limited to the property boundaries. As described in the DPE Report and IRAP, temporary DPE is proposed as an interim remedial action to reduce the residual source and shorten the duration of the project. Alternatively, the removal of the primary source and stability of the plume suggests that natural attenuation could sufficiently reduce the hydrocarbon concentrations over a longer (but reasonable) duration.

As mentioned during multiple telephone conversations and documented in a 22 April 2004 ETIC letter and the DPE Report and IRAP, system installation must be coordinated with site redevelopment activities to minimize impacts to business operations and maintain cost-effectiveness. Redevelopment activities are anticipated to begin shortly.

To proceed with installation of the temporary DPE system in concert with site redevelopment and ensure reimbursement from the California UST Cleanup Fund, ETIC requests your expedited approval of the DPE Report and IRAP. If Alameda County Health Care Services Agency (ACHCSA) approval is not received within 10 working days, the coordination of site activities required to maintain cost-effectiveness may be missed. If this opportunity is missed, we will likely pursue site closure through natural attenuation, rather than active source cleanup.

On several occasions, you have mentioned that other sites in your case load are a higher priority and you do not currently have the time to review ETIC's reports for this site. This position is inconsistent with the regulatory requirements presented in the 15 July 2003 ACHCSA letter. ETIC has made you aware of the need to coordinate the redevelopment and system installation activities and receive your approval in a timely manner; however, we acknowledge that this site does not appear to pose a significant threat to health or the environment and other sites in your case load may pose such threat. To facilitate your approval of the DPE Report and IRAP, we have attached a draft approval letter for your use.

We appreciate your assistance with this project. If you have any questions, please call me at (510) 208-1600 ext. 11.

Sincerely,  
**ETIC ENGINEERING, INC.**

*Katherine Brandt*

Katherine Brandt  
Project Manager

Attachment

Cc: Mr. Donald Strough, Strough Family Trust, 2 Sea View Avenue, Piedmont, California 94611  
Mr. Jonathan Redding, Esq., Wendel Rosen Black & Dean, 1111 Broadway, 24<sup>th</sup> Floor, Oakland, California 94607  
Ms. Donna Drogos, ACHCSA, 1131 Harbor Bay Parkway, Alameda, California 94502