Khatri, Paresh, Env. Health

From: Pardini, Chuck [Chuck.Pardini@lfr.com]
Sent: Wednesday, April 30, 2008 4:22 PM
To: Khatri, Paresh, Env. Health
Cc: Goloubow, Ron
Subject: Former Cox Cadillac Property - Response to ACEH Letter
Attachments: ACEH Response 4-30-08 ltr.pdf

Paresh,

Attached is the memorandum responding to ACEH's March 19, 2008 letter concerning the former Cox Cadillac property, 230 Bay Place, Oakland. We look forward to meeting with you to discuss the project, both past and present. If you have any questions or would like more information, please give me or Ron a call.

Regards,

Chuck

Charles Pardini, P.G.
Principal Geologist
Operations Manager - Los Altos

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LFR

Date: April 30, 2008 **MEMORANDUM**

To: Mr. Paresh Khatri – Alameda County Environmental Health

From: Chuck Pardini - LFR

Subject: **Response to March 19, 2008 Letter from ACEH Concerning Fuel Leak Case No. RO0000148 and GeoTracker Global ID T0600100193, Bill Cox Cadillac & Buick, 230 Bay Place, Oakland, CA 94612**

This memorandum is prepared by LFR Inc. (LFR) on behalf of Bond CC Oakland, LLC (Bond), in response to the subject letter from Alameda County Environmental Health (ACEH) concerning the fuel leak case at 230 Bay Place, Oakland, California ("the Site"). As we discussed during our telephone discussion on March 28, 2008, the purpose of the memorandum is to address some of the comments included in that letter, and to provide you with information that should clarify some of the issues that were raised in the letter.

Response to Technical Comment Number 1:

The primary reason that concentrations of benzene and methyl tertiary-butyl ether (MTBE) remain in soil above their respective cleanup levels at a few locations in the former excavation area, is due to physical constraints that were present at the Site during the excavation and construction activities. Various features, such as the former showroom building (which was required to be preserved because it was designated an architectural landmark), the sidewalk, and the temporary access road and construction trailers used by others, precluded extending the excavation further in these portions of the Site. At locations in which concentrations of constituents were present above their respective cleanup goals and access was less confined, the excavation was extended and an additional confirmation sample was collected.

In addition, the benzene and MTBE that remain at a few locations at the site above their respective cleanup levels, are present at relatively low concentrations. The soil cleanup levels that were required for the Site were those based on the SF Regional Water Quality Control Board Environmental Screening Level that is protective of groundwater as a drinking water source for a property that is to be developed for a commercial use. Based on the remediation work conducted at the Site since the soil cleanup levels were originally set, and on the data collected, we believe that soil cleanup levels that are protective of groundwater that is not a drinking water source, are those that should be applied to the Site. Based on our two quarters of experience conducting the quarterly groundwater monitoring at the Site, the groundwater at the Site appears to be of poor quality (the specific conductance is high), and it occurs in a very poor water-yielding zone (the wells dewater quickly with minimal pumping).

We recommend meeting with you to discuss the benzene and MTBE that remains in the former excavation area, revisiting the soil cleanup levels, discussing the status of the groundwater monitoring program, and identifying the steps to move the Site toward regulatory closure.

Response to Technical Comment Number 2:

The well construction details listed in the letter are not those that were eventually implemented when the monitoring wells were installed at the Site in August and September 2007. The well construction details were revised during telephone calls with Ms. Donna Drogos of ACEH. Ms. Drogos approved the revised well construction details in an e-mail dated August 28, 2007. A copy of this e-mail is attached. The new wells were installed and constructed as indicated in the e-mail. The well construction diagrams are included in LFR's January 31, 2008 initial groundwater monitoring report.

Response to Technical Comment Number 3:

As discussed during our call on March 28, LFR committed to check the status of the submittal of reports to the Regional Water Quality Control Board's (RWQCB's) GeoTracker site. Reports prepared by LFR have been submitted to the ACEH ftp site. However, the reports had not been submitted to the GeoTracker site. We are currently obtaining the required authorization from Bond to submit the reports to the GeoTracker site. Once we are approved by the RWQCB, we will upload the reports to the GeoTracker site.

Response to Technical Report Request:

The schedule included for the technical reports in the ACEH letter, specifically the status of the groundwater monitoring reports, should be modified. LFR submitted the first report (the aforementioned January 31, 2008 report) three months before the date specified in the letter. In addition, it included the perjury letter, as required, signed by a representative for Bond (in this case Lawrence Bond). Also, groundwater samples were collected in February during the second quarterly monitoring event, the results of which will be included in the report that was submitted to you today - April 30.

Thank you for your attention to these responses. We look forward to working with you on this project.

Cc: Mr. Arnold Brown - Kestrel Partners, LLC
Mr. Stephen Wilson - 230 Bay Place, LP
Mr. Rory Campbell, Esq. - Shepard Trust
Mr. Robert Bond - Bond CC Oakland, LLC
Ms. Elicia Fu - Bond CC Oakland, LLC
Mr. Marc Schwartz, Esq. - Bond CC Oakland, LLC
Mr. Alan Lee - Bond CC Oakland, LLC

Pardini, Chuck

From: Drogos, Donna, Env. Health [donna.drogos@acgov.org]
Sent: Tuesday, August 28, 2007 12:18 PM
To: Pardini, Chuck
Subject: RE: Well Construction Details - Cox Cadillac - RO148

Hi Chuck,

Thanks for providing the MW descriptions below & map of locations. Your e-mail accurately summarizes our discussion regarding this phase of work & ACEH concurs with your proposal.

I will document the other items we discussed in a phone log for the case file. These items can be followed up in future phases of work. Donna

Donna L. Drogos, PE
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510-567-6721
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http://www.acgov.org/aceh/index.htm

From: Pardini, Chuck [mailto:Chuck.Pardini@lfr.com]
Sent: Monday, August 27, 2007 5:43 PM
To: Drogos, Donna, Env. Health
Cc: Goloubow, Ron; Sullivan, Michael
Subject: Well Construction Details - Cox Cadillac

Donna,

Following is a description of the well construction details for the five wells at the former Cox Cadillac site. The description follows the results of our recent discussion today. Five wells are to be installed at the Site, LF-1, LF-2, LF-3, LF-4, and LF-5. The attached figure (same as the one e-mailed to you earlier today), shows the location and designation for each.

As we discussed, we will drill borings at well locations LF-2 through LF-5 to a depth of approximately 20 feet below the ground surface. The borings will be drilled using hollow-stem augers and sampled continuously. The screened intervals for these wells will be constructed at the depth of the first water-yielding interval encountered in order to assess and monitor concentrations of petroleum hydrocarbons. Previous investigations have indicated the presence of a coarse-grained, water-yielding interval from about 14 to 16 feet at various locations. The lengths of the screened intervals will be dependent on the thickness of the water-yielding interval (anticipated to be no more than 2 to 3 feet thick based on previous investigations at the Site). The sand pack in each well will not exceed 5 feet in length, meaning the maximum length of screened interval will be no more than 4 feet, though we anticipate shorter screened intervals based on previous investigations at the Site. The wells will be constructed of 2-inch diameter PVC casing.

The boring for well LF-1 will be drilled to a depth of approximately 25 feet. Like the borings for the other wells, this boring will be drilled using hollow-stem augers and sampled continuously. A previous boring (SB-102) at this location indicated petroleum-impacted groundwater up to a depth of approximately 24 feet. In addition, a silty clay interval was encountered at approximately this depth, and deeper sampling was not possible because the rig used encountered refusal. Based on these data, we propose to install the screened interval for well LF-1 from approximately 20 to 24 feet (less screen, if the lithology warrants it). This well will be constructed of 2-inch diameter PVC casing. One point we did not discuss is that we will have a PID in the field during drilling to help in our assessment of screen depths, as well as for health and safety requirements.

Please respond with an e-mail if you approve the well construction details, as described. If there are details that were omitted or not accurately described, please let me know and I will revise the description, as necessary.

Thank you again for your quick response to our request and for the constructive feedback not only to the well discussion, but the other aspects of the report.

Sincerely,

Chuck

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Principal Geologist
Operations Manager - Los Altos

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