

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**

AGENCY

ALEX BRISCOE, Director



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December 3, 2010

Pat Cullen  
State Water Resources Control Board  
Division of Financial Assistance  
1001 I Street  
Sacramento, CA 95814  
(Sent via E-mail to:  
[PCullen@waterboards.ca.gov](mailto:PCullen@waterboards.ca.gov))

Robert Trommer  
State Water Resources Control Board  
Division of Financial Assistance  
1001 I Street  
Sacramento, CA 95814  
(Sent via E-mail to  
[RTrommer@waterboards.ca.gov](mailto:RTrommer@waterboards.ca.gov))

Subject: Response to UST Cleanup Fund Five Year Review for Fuel Leak Case No. RO0000155 and GeoTracker Global ID T0600100899, Mills College, 5000 Macarthur Blvd., Oakland, CA 94619

Dear Mr. Cullen & Mr. Trommer:

Alameda County Environmental Health (ACEH) has received the Preliminary 5-Year Review Summary Reports dated October 20, 2010 from the Underground Storage Tank Cleanup Fund (Fund) for the site listed below. This letter is an effort to document our response. The Summary Report represents the Preliminary 5-year review of ACEH Local Oversight Program cases by the Fund. The Fund correspondence requests that ACEH respond to the Fund correspondence within 45 days of the date of the letter. Responses to the Fund recommendations for the site, are presented below. ACEH staff has reviewed the contents of the correspondence in the context of the appropriateness of recommendations. However, ACEH staff has not reviewed the reports for accuracy of all information presented.

**ACEH disagrees with USTCF review and respectfully requests changes:**

**ACEH Case: RO0000155**  
**USTCF Claim: 2339**  
**Global ID: T0600100899**  
**Site Name: Mills College**  
**Site Address: 5000 Macarthur Blvd., Oakland, CA**

USTCF Recommendations from October 20, 2010 Review Summary:

- Due to the lack of significant detections in the previous investigations and monitoring the UST Fund staff recommends this Site be considered for low risk closure.

ACEH Response: **ACEH disagrees with the Fund recommendations for the following reasons.**

There are many data gaps that exist at the site. ACEH believes that these data gaps should be evaluated in an SCM before the site can be evaluated for low risk closure. No conduit or well survey has been performed at the site. On a topographic map, a water well is identified adjacent to the Corp Yard UST site and one of the soil samples collected at the tank removal contained 16,227 ppm TPHg and 204 ppm benzene. No confirmation samples appear to have been collected to determine if this soil is still there nor

has any soil vapor sampling been completed. ACEH also notes that the RP is not in compliance with Geotracker requirements and the status of the wells is unknown. **ACEH requests modifications as follows:**

- The UST Fund recommends preparing a site conceptual model that synthesizes the following: the results of a preferential pathway survey including a well survey which should identify if the water well located near the Corp Yard is active and/or if it has been contaminated and if any additional water supply wells are located in the area; explanation of why the water levels in wells MW-4 and MW-5 vary by 10 feet from the other three wells; the sample results from the existing wells to determine current concentrations; and either confirmation soil sampling or an evaluation of the vapor intrusion pathway to determine if the soil sample containing 16,227 ppm TPHg and 204 ppm benzene was left in place or removed.

Thank you for providing ACEH with the opportunity to comment on the subject sites. Please contact me if you have any questions regarding the above responses.

Sincerely,

Barbara J. Jakub, P.G.  
Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations  
Electronic Report Upload (ftp) Instructions

cc: Donna Drogos (sent via electronic mail to [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org))  
Barbara Jakub (sent via electronic mail to [barbara.jakub@acgov.org](mailto:barbara.jakub@acgov.org))  
eFile, GeoTracker