

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

January 2, 2009

Councilmember Desley Brooks  
City Hall  
1 Frank Ogawa Plaza  
Oakland, CA 94612

Subject: Fuel Leak Case No. RO0000175 and GeoTracker Global ID T0600102286, Interim Remedial Action Evaluation for Foothill Mini-mart, 6600 Foothill Boulevard, Oakland, CA 94605

Dear Councilmember Brooks:

Alameda County Environmental Health (ACEH) has prepared this response to your requests, during the December 19, 2008, meeting with you, Darryl Stewart, Mark Gomez, Mark Arniola, Gregory Hunter, Daniel Firth, and Paresh Khatri, for immediate implementation of interim remedial actions (IRA) on the subject site and on the adjacent LeBlanc property (6620 Foothill Blvd.). We have evaluated your suggestions that IRA may accelerate the cleanup at the subject site as well as neighboring properties. We also understand that you are concerned with the presence of contamination in the city owned right of way. Groundwater pump and treat at the subject site and in-situ chemical oxidation consisting of hydrogen peroxide injection at the groundwater contaminant plume boundary at LeBlanc's property was suggested by Mr. Gomez as an immediate interim measure to reduce petroleum hydrocarbon concentrations off-site in lieu of or concurrent to conducting additional site assessment as currently planned.

Background

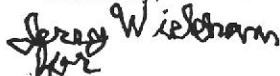
The subject site had a petroleum hydrocarbon release of gasoline fuel containing methyl tertiary butyl ether (MTBE) resulting in a dissolved phase petroleum hydrocarbon contaminant plume containing MTBE that extends from the subject site migrating down-gradient in a southeasterly direction across Foothill Boulevard. The southwest corner of the LeBlanc property contains low concentrations of dissolved-phase petroleum hydrocarbons (PHC) from the cross-gradient boundary of the plume. Specifically, MW-4, located on the LeBlanc property, contains 2,000 ppb Total Petroleum Hydrocarbons as Gasoline (TPHG), 0.58 ppb Benzene (slightly above the detection limit), and 31 ppb MTBE. These values, along with data from the subject site, and the lack of significant levels of benzene, indicate the presence of primarily an MTBE plume undergoing degradation with a TPHG component the core of which appears to have migrated to a location across Foothill Blvd. We understand that the LeBlanc's believe that their property is negatively impacted due to the presence of dissolved phase PHC and consequently they and the City of Oakland's redevelopment agency are precluded from developing their property. The data collected to date are insufficient to justify a determination that the LeBlanc property is substantially adversely affected and that all development is precluded. Development of the LeBlanc property may be possible depending on site development plans. We understand that an exact description of the proposed LeBlanc development is to be provided to ACEH by the City at a future date.

Conclusion

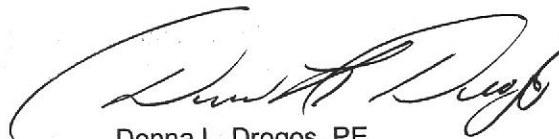
To be protective of human health, the environment, and the stakeholders in the City of Oakland, ACEH has directed the RP to implement the next phase of investigative fieldwork to address data gaps that currently exist at the site. This is the most prudent course of action to address contamination at the subject site and neighboring properties. The data obtained from the pending site investigation is necessary to design a Corrective Action Plan for cleanup of petroleum hydrocarbon constituents that is protective of human health both during implementation and ultimately at final cleanup. At this late stage in site investigation, IRA in general as well as the specific IRA proposals by Mr. Gomez are neither technically nor economically justifiable and would appear to provide a very limited benefit to on or offsite cleanup. The best course of action for this site is completion of the scheduled site investigation activities, preparation of a Corrective Action Plan, and implementation of final cleanup activities. This plan of action is more efficient and will provide better long term protection of human health and the environment.

If you have any questions, please call me at (510) 777-2478 or send me an electronic mail message at [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org).

Sincerely,



Paresh C. Khatri  
Hazardous Materials Specialist



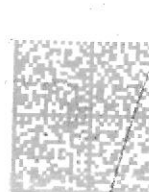
Donna L. Drogos, PE  
Supervising Hazardous Materials Specialist

cc: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032  
Darryl Stewart, Alameda County, 1221 Oak Street, Suite 536, Oakland, CA 94612  
Mark Gomez, Public Works Agency, Environmental Services Division, 250 Frank H. Ogawa Plaza, Suite 5301, Oakland, CA 94612  
Mark Arniola, Public Works Agency, Environmental Services Division, 250 Frank H. Ogawa Plaza, Suite 5301, Oakland, CA 94612  
Gregory Hunter, Economic Development & Redevelopment, 250 Frank H. Ogawa Plaza, Suite 5313, Oakland, CA 94612  
Larry A. Gallegos, City of Oakland, Community and Economic Development Agency, 250 Frank H. Ogawa Plaza, 5<sup>th</sup> Floor, Oakland, CA 94612  
Dylan T. Radke, Gordon, Watrous, Ryan, Langley, Bruno & Paltenghi, 611 Las Juntas Street, P.O. Box 630, Martinez, CA 94553  
Ravi Sekhon, 21696 Knuppe Place, Castro Valley, CA 94552  
Abdul Ghaffar, Zaron, Inc., 40092 Davis Street, Fremont, CA 94538  
J & S Petroleum, Inc., c/o Javad Enterprises, 3300 Powell St., Ste 16, Emeryville, CA 94608  
Ariu Levi, ACEH  
Daniel Firth, ACEH  
Donna Drogos, ACEH  
Paresh Khatri, ACEH  
File



ALAMEDA COUNTY  
**HEALTH CARE SERVICES AGENCY**

Department Of Environmental Health  
Environmental Protection Division  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577



02 1M  
0004256164  
MAILED FROM ZIP CODE 94502  
PINEY BOWLS  
\$ 00.42<sup>00</sup>  
JAN 06 2009

2009 JAN 12

**J & S Petroleum, Inc.**  
**c/o Javad Enterprises**  
**3300 Powell Street, Suite 16**  
En

*NOT HERE*

NIXIE 945 DE 1 00 01/11/09

RETURN TO SENDER  
ATTEMPTED - NOT KNOWN  
UNABLE TO FORWARD

BC: 94502654031 \*1605-22296-06-36

94502654031 945026540

