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HEALTH CARE SERVICES
AGENCY
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December 4, 2013

Mr. Robert Trommer
State Water Resources Control Board
Underground Storage Tank Cleanup Fund
1001 I Street, 16th Floor
Sacramento, CA 95814
(sent via email to Bob.Trommer@waterboards.ca.gov)

Subject: Rino Pacific/Oakland Truck Stop Fourth Review Report dated October 24, 2013
ACEH Fuel Leak Case No. RO0000234 and GeoTracker Global ID No. T0600102136, Rino Pacific/Oakland Truck Stop, 107 5th Street, Oakland, CA 94607

Dear Mr. Trommer:

This correspondence presents the Alameda County Environmental Health (ACEH) response to the October 24, 2013, "*Fourth Review Summary Report – Closure, Claim 13192; Rino Pacific/Oakland Truck Stop, 107 5th St, Oakland,"* (Review) prepared by the State Water Resources Control Board Cleanup Fund (Cleanup Fund) for the fuel leak case at 107 5th Street, Oakland, CA. The October 24, 2013 Review indicates that the Cleanup Fund Manager has determined that case closure is appropriate.

ACEH will proceed with closure of the Rino Pacific fuel leak case with site management requirements. We do not concur with closure of the fuel leak case without site management requirements. Although the site does not appear to present a risk under current conditions as an active fueling facility with a paved surface, redevelopment of the site could result in exposure to contamination in shallow soil and the potential for vapor intrusion. The site management requirements will require agency review and approval in the event that the site is redeveloped.

We do not want to duplicate case closure processes with the Cleanup Fund. If the Cleanup Fund plans to move forward with case closure without site management requirements, please inform us of your intent. Otherwise, ACEH will begin case closure processes on January 16, 2014.

The Review contained some inaccuracies which we have corrected below. In addition, we have identified some of the specific issues that were considered with regard to the need for site management requirements.

Remedial System Operation (Page 1, 2nd paragraph)

The Review indicates that two ozone systems are operating. However, the ozone systems were shut down on April 19, 2011 and have not operated since then.

Human Health Risk Assessment (Page 2, 2nd paragraph)

The Review indicates that although no document titled "Risk Assessment" was found in the files, "a professional assessment of site-specific risk from potential exposure to residual soil contamination found that the maximum concentrations of petroleum constituents remaining in soil will have no significant risk of adversely affecting human health." The type of assessment and what assumptions were made are not described. This statement can be interpreted as characterizing human health risks for both current and future land use scenarios. We are not aware of a completed human health risk assessment that would support this statement. If the Cleanup Fund has completed this type of assessment, disclosure of this evaluation would be useful.

We do not believe that the site can be closed without site management requirements for the following reasons:

- Limited data have been collected from shallow soil less than 10 feet below ground surface. Strong odors are noted on boring logs from soils as shallow as 1 foot below ground surface. In most borings, no soil samples were analyzed from the shallow soils exhibiting odors. Therefore, the maximum concentrations in the soil data set are likely not representative of the shallow residual contamination present.
- The existing data set indicates that elevated concentrations of petroleum hydrocarbons are present in shallow soils. We have attached Cross Section A-A', which shows adsorbed TPHg in shallow soils. The foundations of any future buildings on the site are likely to be within close proximity to the shallow TPH contamination without a sufficient bioattenuation zone to attenuate vapor intrusion.

Objections to Closure and Responses (Page 2, 3rd paragraph)

The Review indicates that "These sporadic and abrupt increases in petroleum hydrocarbon concentrations coincide with the intermittent injections of ozone used to remediate the Site." We have reviewed the groundwater concentration graphs for the site and do not find a correlation with operation of the ozone system. We have attached several concentration graphs showing that the sporadic increases occurred prior to, during, and following the operation of the ozone system.

Estimate of Hydrocarbon Mass in Soil (Page 11)

The Review indicates no estimate of the mass in soil is reported. Estimates of the adsorbed and dissolved mass are presented in Appendices D and E, respectively of the "*Conceptual Site Model*," dated June 3, 2013. The adsorbed mass of TPHg in soil is 312 gallons and the adsorbed mass of TPHd in soil is 2,237 gallons.

Conclusion

ACEH will proceed with closure of the Rino Pacific fuel leak case with site management requirements. If the Cleanup Fund plans to move forward with case closure without site management requirements, please inform us of your intent. Otherwise, ACEH will begin case closure processes on January 16, 2014.

If you have any questions regarding this case, please call Jerry Wickham at (510) 567-6791.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Attachment 1: Geologic Cross Section A-A': Adsorbed TPH-G
Attachment 2: TPH Concentrations for Well MW-4
Attachment 3: TPH-G and MTBE Concentrations for Well MW-5
Attachment 4: TPH-G and TPH-D Concentrations for Well MW-7
Attachment 5: Selected Concentrations for Well MW-14

cc: Reed Rinehart, Rino Pacific, 2401 North State Street, Ukiah, CA 95482

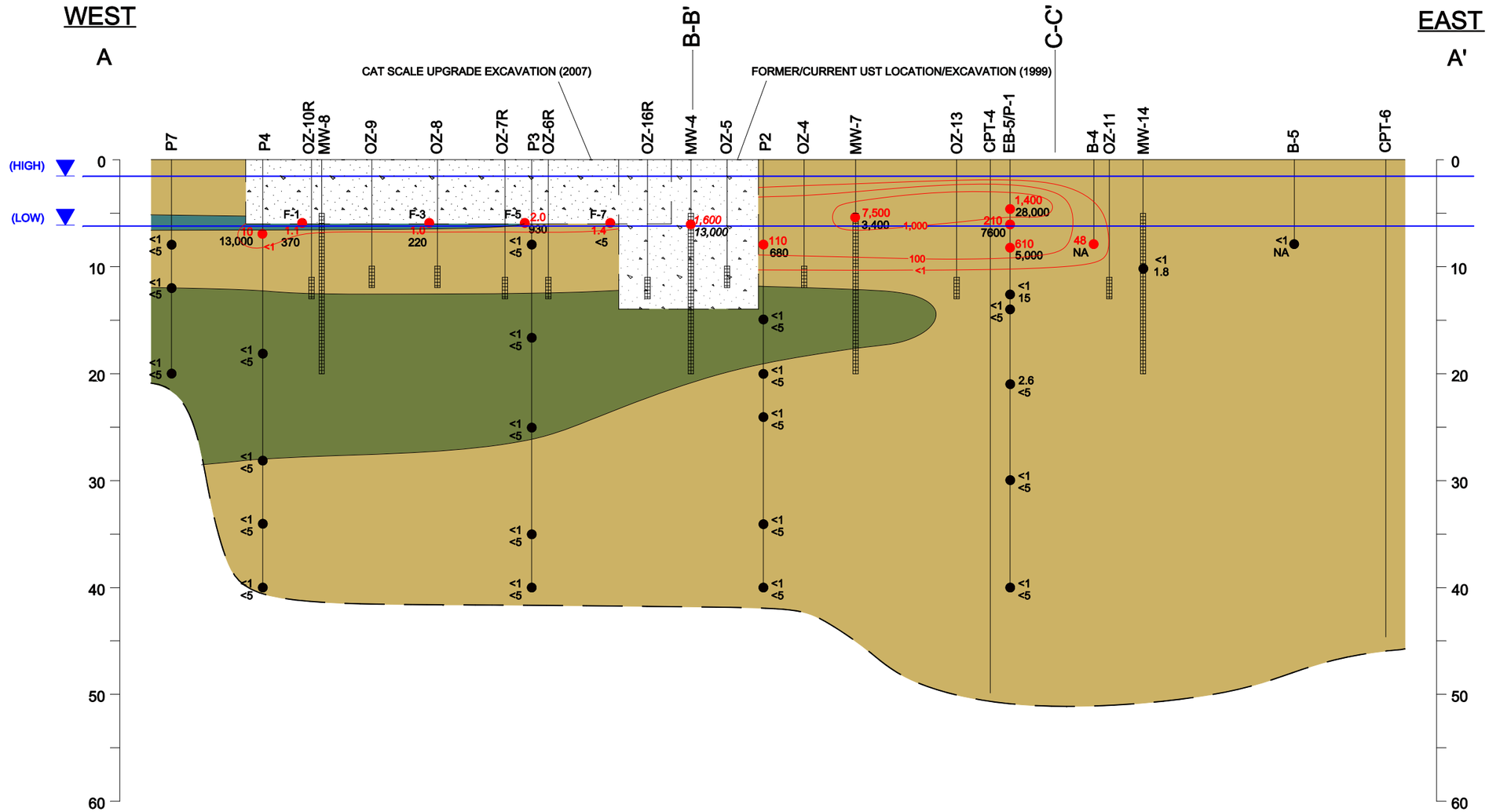
Tony Muir and Lilllie Earls, P.O. Box 328, Wilsonville, OR 97070-328

Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 2032 (*Sent via E-mail to: lgriffin@oaklandnet.com*)

Brian Millman, GeoEnvironmental, Inc., 837 Shaw Road, Stockton, CA 95215 (*Sent via E-mail to: bmillman@advgeoenv.com*)

Dilan Roe, ACEH (*Sent via E-mail to: dilan.roe@acgov.org*)
Jerry Wickham, ACEH (*Sent via E-mail to: jerry.wickham@acgov.org*)

GeoTracker, eFile



LEGEND

- TOPSOIL/FILL MATERIAL
- SILTY CLAY, CLAY
- "BAY MUD:" PEAT, CLAYEY PEAT, PEATY CLAY, PEAT WITH SAND
- SAND, SILTY SAND, CLAYEY SAND, SANDY SILT
- HISTORICAL HIGH/LOW OR AVERAGE DEPTH TO GROUND WATER
- SCREEN INTERVAL OF WELL OR TEMPORARY WELL SCREEN LOCATION
- SOIL SAMPLE LOCATION WITH: TPH-G CONCENTRATION / TPH-D CONCENTRATION (e.g. 12 / 51)
- EXTENT OF LITHOLOGIC INFORMATION
- EXTENT OF CROSS-SECTION
- EXTENT OF ADSORBED TPH

Notes

2.5X VERTICAL EXAGGERATION.
TPH-G: TOTAL PETROLEUM HYDROCARBONS AS GASOLINE
TPH-D: TOTAL PETROLEUM HYDROCARBONS AS DIESEL
ALL CONCENTRATIONS IN MILLIGRAMS PER KILOGRAM (MG/KG)
UST AREA PROJECTED - 5'
MW-8, B-4, AND B-5 PROKECTED - 13'
P-7 PROJECTED - 15' AND P-1 PROJECTED - 18'

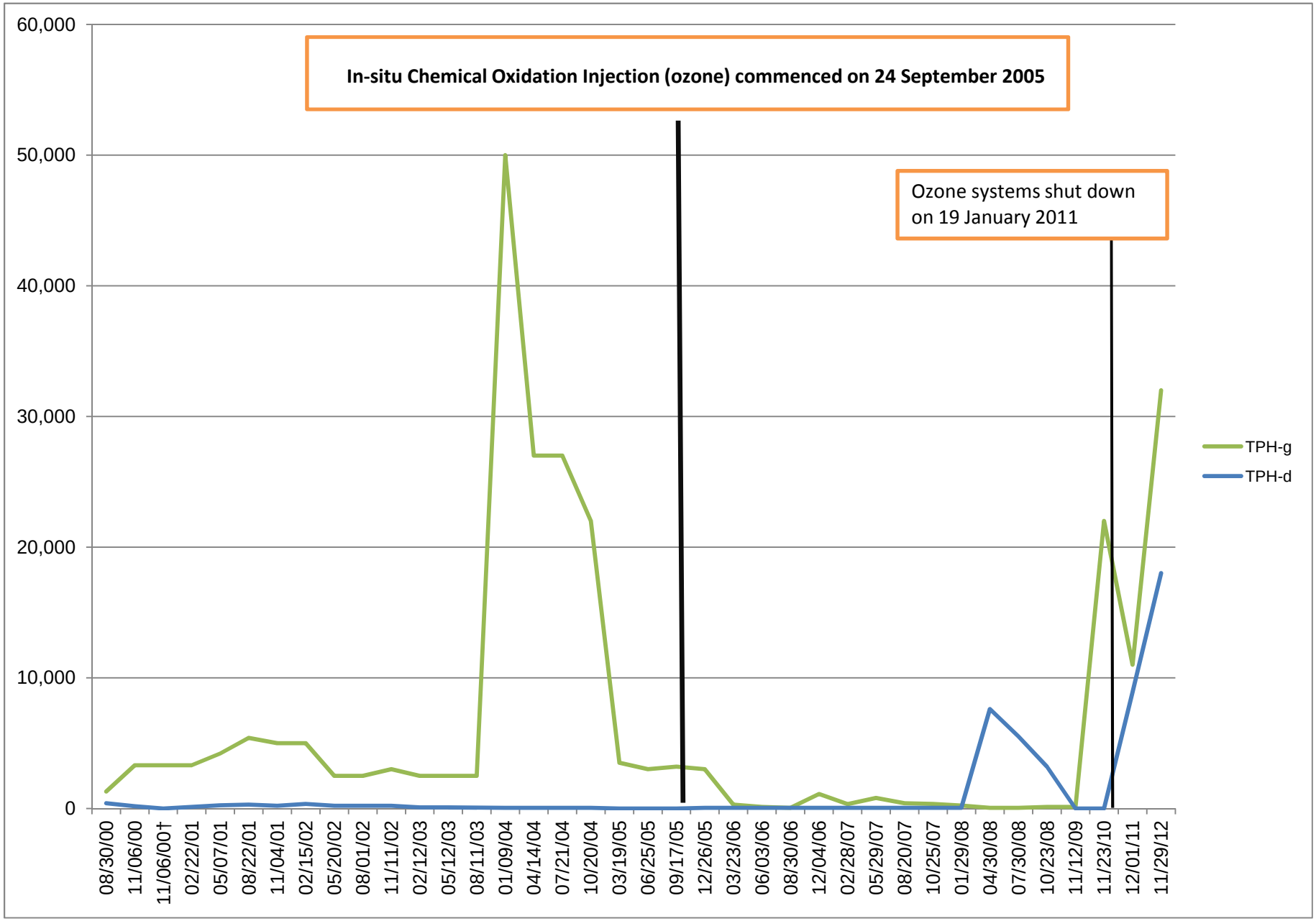
SCALE
0 30 60
FEET

GEOLOGIC CROSS-SECTION A-A': ADSORBED TPH-G
RINO/PACIFIC OAKLAND TRUCK STOP
1107 5TH STREET
OAKLAND, CALIFORNIA

Advanced GeoEnvironmental, Inc.
www.advgeoenv.com

PROJECT NO. AGE-NC-03-1101 | FILE: AATPHG | FIGURE: 9
DATE: APRIL 2013 | DRAWN BY: MAC

RINO PACIFIC/OAKLAND TRUCK STOP
TPH CONCENTRATIONS FOR WELL MW-4



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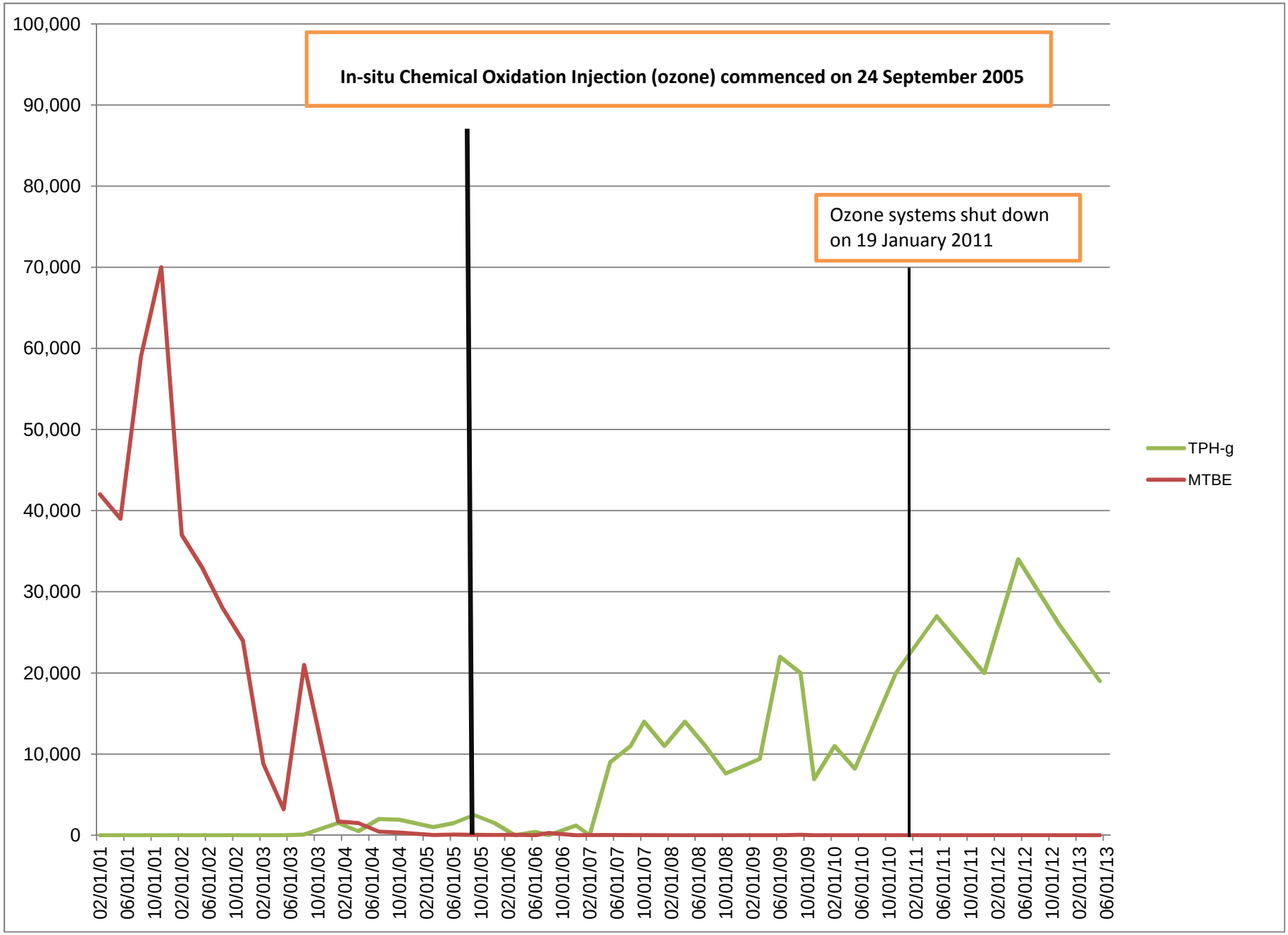
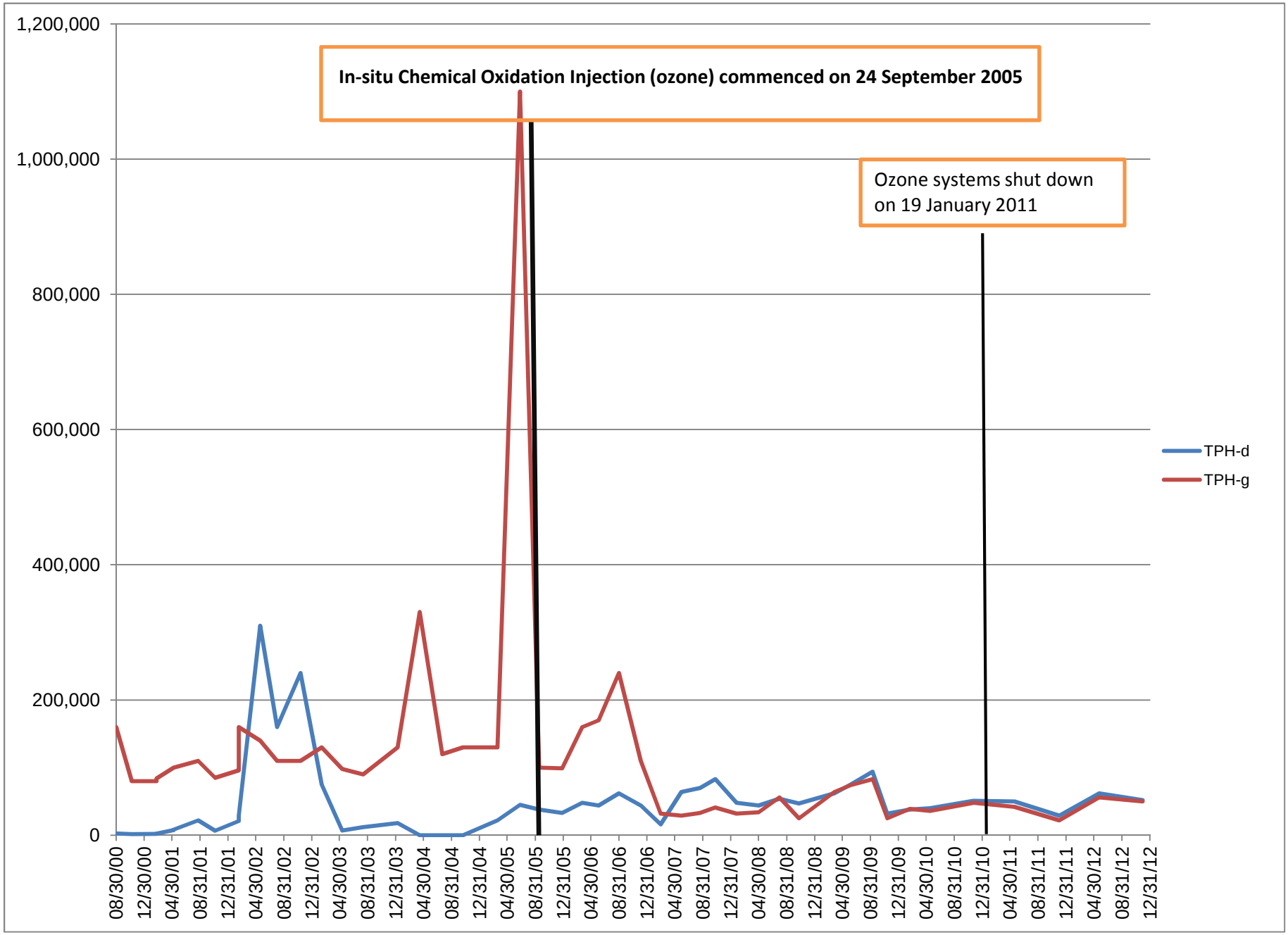
RINO PACIFIC/OAKLAND TRUCK STOP
TPH-G AND MTBE CONCENTRATIONS FOR WELL MW-5



RINO PACIFIC/OAKLAND TRUCK STOP
TPH-G and TPH-D CONCENTRATIONS FOR WELL MW-7



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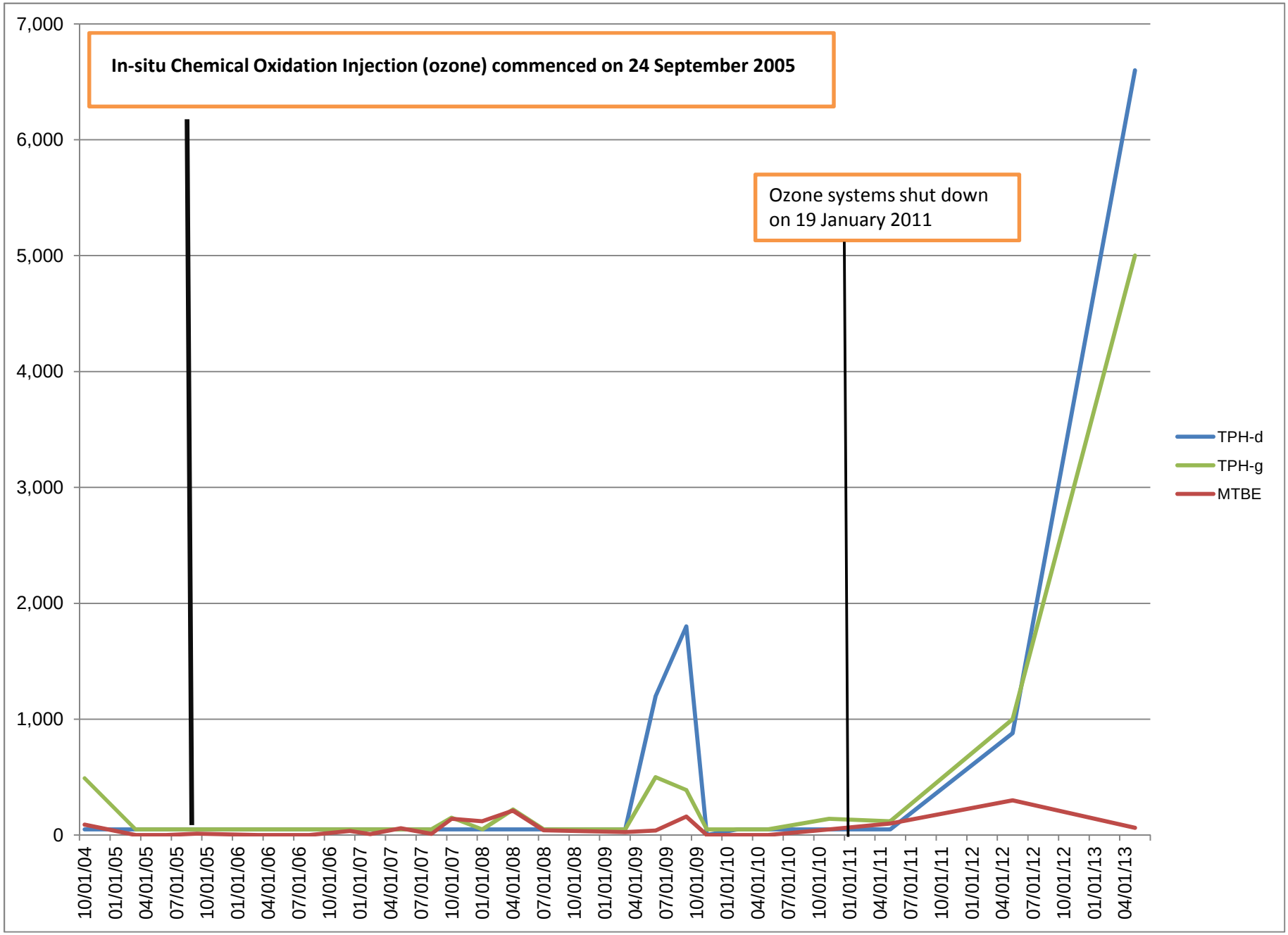
RINO PACIFIC/OAKLAND TRUCK STOP
SELECTED CONCENTRATIONS FOR WELL MW-14



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