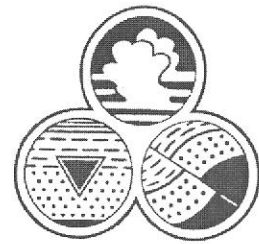


# Advanced GeoEnvironmental, Inc.



02 March 2009  
AGE-NC Project No. 03-1101

Mr. Jerry Wickham  
Alameda County Environmental Health Services  
1131 Harbor Bay Parkway, Suite 250  
Alameda, California 94502-6577

**Subject: Request for Reduced Monitoring, Sampling and Reporting  
RINO PACIFIC/OAKLAND TRUCK STOP  
ACEHS Fuel Leak Case No. RO0000234  
1107 5<sup>th</sup> Street, Oakland, California**

Dear Mr. Wickham:

At the request of Mr. Reed Rinehart of Rino Pacific, LLC, *Advanced GeoEnvironmental, Inc.* (AGE) proposes a specific reduced monitoring program for 1107 5<sup>th</sup> Street, Oakland, California (site). AGE originally submitted a request for reduced monitoring dated 04 February 2009. However, in a phone conversation with Alameda County Environmental Health Services (ACEHS - Mr. Wickham) and AGE (Mr. Deicke), ACEHS requires specific details and technical justification for reductions in monitoring.

As ACEHS is aware, the site has been funded by the Underground Storage Tank Cleanup Fund (USTCF). As of 07 January 2009, USTCF Letter of Commitment (LOC) for the site's claim has been suspended. According to the State Water Resources Control Board (SWRCB) letter titled USTCF Notice of Suspension of LOC dated 07 January 2009, any cost incurred after 17 January 2009 will not be reimbursed until the LOC suspension is lifted. The claim suspension creates a financial hardship on Rino Pacific, LLC. Due to limited funding alternatives and as specifically requested by SWRCB in their letter titled *Important Notice - Delay in Fund Reimbursements* dated 23 October 2008, Rino Pacific, LLC proposes to take all appropriate steps to immediately reduce costs until funding is resumed.

## Ground Water Monitoring, Sampling and Reporting

Currently, Rino Pacific, LLC monitors and samples 15 ground water monitoring wells on a quarterly basis and provides quarterly technical reports to ACEHS. The data has been collected from some ground water monitoring wells at site since 1996. A strong set of ground water elevation and analytical data has been accumulated. Rino Pacific, LLC understands the importance of monitoring

and sampling specific ground water monitoring wells for water quality concerns and has produced a plan that will monitor water quality while reducing costs.

Rino Pacific, LLC requests the ACEHS approve a reduced monitoring, sampling and reporting program for the site as follows:

- Quarterly monitoring (measuring depth to water) of site ground water monitoring wells.
- Quarterly sampling of three ground water monitoring wells (MW-5, MW-7 and MW-14).
- Annual monitoring and sampling of eight ground water monitoring wells (MW-1, MW-3N, MW-8, MW-9, MW-12, MW-13, MW-15 and MW-16).
- Temporary suspension of sampling requirements of four ground water monitoring wells (MW-4, MW-6, MW-10 and MW-11).
- Semi-annual reporting of data collected for two quarters, with reports to include updates of interim remedial activity at the site.

Additionally, Rino Pacific, LLC requests to eliminate the analysis of total petroleum hydrocarbons quantified as diesel (TPH-d) for ground water monitoring wells MW-3N, MW-4, MW-6, MW-9 through MW-12, MW-15 and MW-16; eliminate the analysis of di-isopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), 1,2-dibromoethane (EDB) and 1,2-dichloroethane (1,2-DCA) for all site associated wells. Analysis of total petroleum hydrocarbons quantified as diesel (TPH-d) should be continued for ground water monitoring wells MW-1, MW-5, MW-7, MW-8, MW-13 and MW-14.

The analysis of the total petroleum hydrocarbons quantified as gasoline (TPH-g); benzene, toluene, ethyl-benzene and total xylenes (BTEX); methyl tertiary butyl ether (MTBE) tertiary amyl methyl ether (TAME) and tertiary butyl alcohol (TBA) for all ground water monitoring wells should be continued.

A table presenting technical justification of the modifications requested is attached. The table describes each ground water monitoring well identification with: the screen interval; location of the well (on- and off-site location, relationship to general gradient flow); general petroleum impact at each well; current sampling frequency; proposed sampling frequency; and justification for sampling reduction.

Rino Pacific, LLC requests this reduced monitoring proposal be approved beginning with the first quarter 2009. The annual event is proposed for the fourth quarter of the year and will document the third and fourth quarter events, while the semi-annual event report would document the first and second quarter events.

Interim In-situ Ozone Injection Remedial System

An interim in-situ ozone injection remedial system has been operating at the site since January 2006 and has reduced hydrocarbon concentrations in most hydrocarbon-impacted site wells. Rino Pacific, LLC will continue to operate and maintain the interim remedial system, but proposes to reduce the monitoring requirements.

The current monitoring of the interim remedial system consists of:

- Quarterly measurement of dissolved oxygen (DO) and oxygen reduction potential (ORP) at wells MW-4 through MW-8 and MW-14 and
- Weekly maintenance checks and recording of system operational parameters.


Rino Pacific, LLC requests to reduce the monitoring of the interim remedial system to semi-monthly maintenance checks and recording of system operational parameters. DO and ORP measurements for wells MW-4 through MW-8 and MW-14 have been collected since October 2005 and have not shown consistent trends in any of the six wells measured. Due to close proximity to the San Francisco Bay and shallow ground water levels, consistent DO and ORP readings are not expected and do not provide beneficial data to the site investigation. Further collection of DO and ORP should be discontinued.


Any additional assessment, work plans or other work should be delayed until USTCF funding suspension is lifted. Rino Pacific, LLC is willing to meet with the ACEHS to further discuss the site work delays forced by the current economic situation and the USTCF suspension.

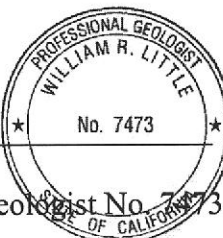
If you have any questions or require further information, please contact our office at (800) 511-9300.

Sincerely,

**Advanced GeoEnvironmental, Inc.**

  
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Arthur E. Deicke Jr.  
Project Scientist

  
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William R. Little  
California Professional Geologist No. 7473



Enclosure

cc: Mr. Reed Rinehart, Rino Pacific, LLC

PROPOSED MODIFICATION TO MONITORING PROGRAM  
Rino Pacific (Oakland Truck Stop)  
1107 5th Street  
Oakland, California

ID	Screen Interval (feet bsg)	Location	Petroleum Impact	Curent Sampling Frequency	Proposed Sampling Frequency	Justification for Sampling Reduction
MW-1	10 to 20	Southwest portion of site	TPH-d	Quarterly	Annual	42 sampling events since 1996; MTBE ND past 4 quarters, but TPH-d present past 3 quarters
MW-3N	5 to 12	South central portion of site	MTBE	Quarterly	Annual	26 sampling events since 2002; MTBE ND last quarter, downward trend
MW-4	5 to 20	North central portion of site	TPH-g/MTBE	Quarterly	Annual Suspend - DTW only	34 sampling events since 2000; TPH-g/MTBE downward trends; located in vicinity of wells MW-5, MW-6 and MW-7
MW-5	5 to 20	Central portion of site	TPH-d/TPH-g	Quarterly	Quarterly	34 sampling events since 2000; MTBE ND for past 6 quarters; downward trend TPH-g/TPH-d
MW-6	5 to 20	Central portion of site	TPH-g	Quarterly	Suspend - DTW only	34 sampling events since 2000; MTBE; downward trend MTBE, recent detections of TPH-g, isolated recent report of TPH-d; located in vicinity of wells MW-4, MW-5 and MW-7
MW-7	5 to 20	Central portion of site	TPH-g/TPH-d BTEX/MTBE	Quarterly	Quarterly	34 sampling events since 2000; all chemicals have shown general downward trends, but well remains heavily impacted
MW-8	5 to 20	Northwest portion of the site	TPH-d/TPH-g/ MTBE	Quarterly	Annual	34 sampling events since 2000; TPH-g/TPH-d/MTBE have shown general downward trends
MW-9	5 to 20	Southwest corner of site	MTBE	Quarterly	Annual	34 sampling events since 2000; TPH-g ND for past 14 quarters; TPH-d ND for past 20 quarters; MTBE ND for past 3 quarters
MW-10	5 to 20	Upgradient off-site to south	None recent	Quarterly	Suspend - DTW only	25 sampling events since 2002; inconsistent and isolated detections of TPH-g (1 of 25 events) and benzene; TPH-d/MTBE ND for past 20 quarters

PROPOSED MODIFICATION TO MONITORING PROGRAM  
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ID	Screen Interval (feet bsg)	Location	Petroleum Impact	Curent Sampling Frequency	Proposed Sampling Frequency	Justification for Sampling Reduction
MW-11	5 to 20	Upgradient off-site to south	None recent	Quarterly	Suspend - DTW only	25 sampling events since 2002, one isolated TPH-g detection in last 19 events
MW-12	5 to 20	Downgradient off-site to north	None	Quarterly	Annual	17 sampling events since 2004; no detections; sample annual as downgradient point for plume
MW-13	5 to 20	Downgradient offsite to north	MTBE	Quarterly	Annual	17 sampling events since 2004; irregular MTBE detections; sample annual as downgradient point for plume
MW-14	5 to 20	Downgradient off-site to north	MTBE	Quarterly	Quarterly	17 sampling events since 2004; irregular TPH-g detections; general and recent increase in MTBE detections
MW-15	5 to 20	Downgradient off-site northeast	None	Quarterly	Annual	5 sampling events since 2007; no detections; sample annual as downgradient point for plume
MW-16	5 to 20	Downgradient off-site northwest	None	Quarterly	Annual	5 sampling events since 2007; no detections; sample annual as downgradient point for plume

Notes:

Quarterly monitoring of all wells to include measuring depth to water

MTBE: Methyl tertiary butyl ether

TPH-g/d: Total petroluem hydrocarbons quantified as gasoline/diesel

BTEX: benzene, tolouene, ethyl-benzene and total xylenes