

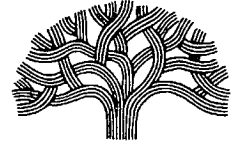


RECEIVED

2:26 pm, Aug 10, 2009

Alameda County
Environmental Health

CITY OF OAKLAND



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Public Works Agency
Environmental Services

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August 3, 2009

Mr. Paresh Khatri
Hazardous Materials Specialist
Alameda County- Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502

Re: Response to the County's Letter dated July 24, 2009- Fuel Leak Case No. RO0000293-7101 Edgewater Drive, Municipal Service Center, Oakland, CA

Dear Mr. Khatri:

This is regarding your letter dated July 24, 2009 regarding the groundwater monitoring requirements for the Municipal Service Center (MSC) site in Oakland. The City of Oakland respectfully disagrees with the County's assessment that a quarterly groundwater monitoring program is warranted at the subject site.

Groundwater was monitored quarterly at the site from 1989 through 2002. Since 2002, groundwater at the site has been monitored semi-annually. Removal of free-phase petroleum products has been on-going since 2000, which include passive and active skimming operations, and most importantly a dual-phase extraction system since May 2006. In addition to the semi-annual groundwater monitoring report, in June 2009, the City has submitted a progress report to the County that details the progress of the groundwater treatment system at the subject site.

Concentrations of petroleum hydrocarbons have shown an overall decreasing trend across the site. In addition, almost 99% of the free product has been recovered from the contaminated areas. The results of the groundwater monitoring show no indication of off-site migration of site contaminants. Therefore, none of the site conditions indicate a need for quarterly monitoring. In fact, upon a review of the 20 years of quarterly and semi-annual monitoring data, the City has concluded that an annual groundwater monitoring event would be adequate for assessing remediation progresses and for contamination monitoring.

The City of Oakland has been pro-active in the remediation of this site and has taken several steps beyond the County's requirements, including compilation of all existing data into a GIS system, and enhanced remediation using peroxide injections. Since quarterly monitoring would not provide any additional information for contaminant

Mr. Paresh Khatri
Alameda County-Environmental Health Services

monitoring or remediation progress, we respectfully request you to consider yearly monitoring for this site. Also, we would be able to direct the limited resources towards risk assessment, and remediation efforts rather than additional monitoring.

As indicated in my email dated July 21, 2009, and my previous voice messages from June, we would like to start the site risk assessment and establish site-specific remediation goals. I would greatly appreciate, if I could have a meeting with you to discuss the remediation progress and the risk assessment for the MSC site. I am available to meet on most working days in August. I can also check with our consultants for their availability.

If you have any questions, or would like additional information, please call me at (510) 238-6361.

Sincerely,



Gopal Nair
Environmental Protection Specialist

cc: Charles Pardini, LFR, Inc. (sent via email)
George Lockwood, State Water Resources Control Board (sent via email)
Leroy Griffin, Oakland Fire Department (sent via email)
Donna Drogos, ACEH (sent via email)