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May 31, 2012

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)

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)

Subject: Response to UST Cleanup Fund Five Year Review for Fuel Leak Case No. RO0000337 (Global ID #T0600100249), California Linen Supply Company, 989 41st Street, Oakland, California 94609

Dear Mr. Cullen & Mr. Trommer:

ACEH has received the second 5-Year Review Summary Report dated December 7, 2011 from the Underground Storage Tank Cleanup Fund (USTCF) for the site listed below. The Summary Report represents the second five year review of this site managed by the ACEH Local Oversight Program by the Fund. The Fund correspondence requests that ACEH respond to the Fund correspondence within 45 days of the date of the letters (January 20th). We have reviewed the contents of the correspondence in the context of the appropriateness of recommendations. However, we have not reviewed the reports for accuracy of all information presented.

The ACEH response was provided to the UST Cleanup Fund Staff on December 15, 2011 with a request for a conference call which remains unanswered despite multiple requests and attempts over a period of nearly six months. As a consequence, this letter is intended to memorialize the ACEH response.

ACEH Case: RO0000337
USTCF Claim: 3000
Global ID: T06001000249
Site Name: California Linen Supply Co.
Site Address: 989 41st Street, Oakland, CA

USTCF Recommendations from December 7, 2011 Review Summary:

UPDATED December 2011, based on the screening-level risk assessment, the hydrology, geology and other factors at and in the vicinity of the Site, the residual petroleum hydrocarbons that remain in soil and groundwater pose a low risk to public health, safety and the environment, the remaining mass of residual petroleum hydrocarbons is limited to a small area on-Site, the dissolved petroleum hydrocarbon constituents in that area are biodegrading and the plume in groundwater is decreasing. Affected groundwater is not currently used as a source for beneficial uses and it is highly unlikely that is will be used for beneficial use in the foreseeable future. The Funds recommendations the LOP consider this site for closure.

ACEH Response: **ACEH is in complete disagreement with this recommendation**. Please reference ACEH's 5-year review response and attachments, to the Celis Service Station (Claim 17922, RO0000453, and T0600101794), which is tied to this site through the paleochannel network discussed below. Please also see the "Vicinity Paleochannels" map attached to that response.

This site is situated at the eastern end of the currently known extent of paleochannels that extends beneath Oakland and Emeryville for a distance of over 1,500 feet (see attached mapped paleochannel network). This has allowed the migration of free-phase concentrations of petroleum hydrocarbons (mineral spirits and gasoline) over that distance (not the 250 feet per the often cited LLNL study). There are 7 known sites that have comingled plumes, and innocent property owners are involved. Continuing work at this site appears to extend the paleochannel network to the northeast of this site. This recent work (2009 and continuing as of this date, and thus not fully reported yet) is based on geophysical conductivity profiles (fine vs. granular sediments) upgradient and downgradient of the site, as well as soil vapor sampling beneath the site and upgradient of the site. Onsite soil vapor sampling appears to map out two principal paleochannels beneath the site. Soil vapor concentrations within those paleochannels for TPHg are up to 15,000,000 ug/m^3 (29,000 ug/m^3 ESL) and for benzene 53,000 ug/m^3 (280 ug/m^3 ESL); these are one to two orders of magnitude above their respective commercial ESLs (see attached map data submittal). The recent, on-going, and currently unreported work appears to have located one and perhaps two unreported UST locations north of 41st Street (currently unlisted as the data has not been fully reported). These may be the source of soil vapor concentrations beneath the subject site; however, this is not fully understood due to the current and on-going nature of the data at present. The elevated soil vapor concentrations are mapped to extend to the south of the subject site (via the paleochannel network) to older residential properties and low income housing that border the subject site on the south (over 300 feet from their potential source). These have been unevaluated for vapor intrusion, but the work is already approved, but is pending the resolution of offsite access difficulties. Due to offsite access difficulties, ACEH letters requesting / requiring offsite access of several parcels are likely to be issued shortly. Two of the homes are reported to have basements.

In regards to the "Risk Evaluation" section provided by USTCF staff, ACEH is not aware of a 1996 RWQCB guidance that excludes the groundwater ingestion pathway from consideration because the site groundwater is not currently used as a source of drinking water. ACEH is aware of the 1992 Resolution 92-49 ("non-attainment / containment zone") policy that was intended to designated zones of non-attainment / containment but the policy was only used for chlorinated VOCs, metals, and mercury contamination, has not been used since 1999 because of significant policy problems, and could only be used by RWQCB staff at that time. A vapor intrusion pathway is referenced in the "Risk Evaluation" section; however, this does not appear consider more recent site specific data.

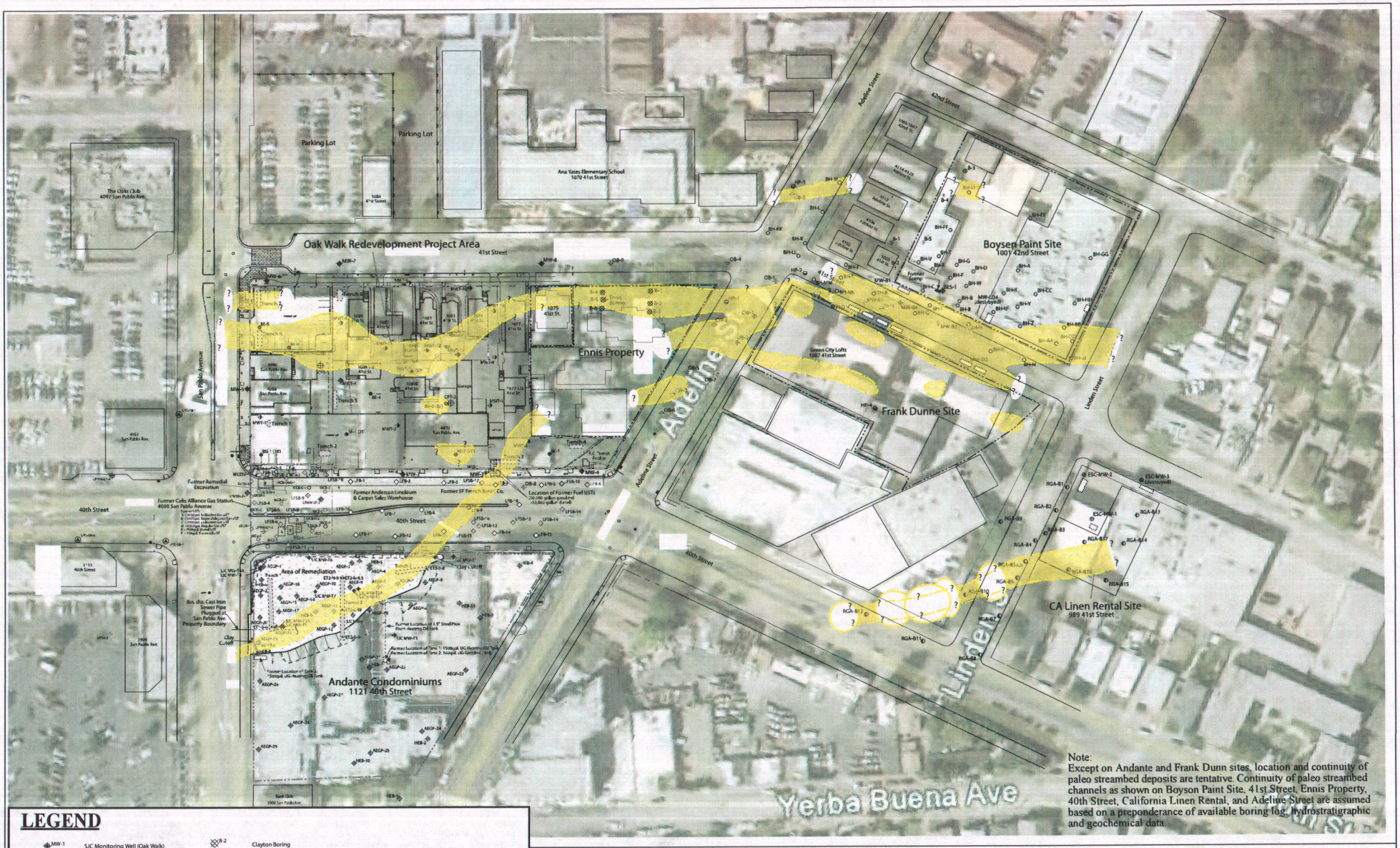
Thank you for the opportunity to respond. Should you have any questions, do not hesitate to call me at (510) 567-6876, or to send me an e-mail at mark.detterman@acgov.org.

Sincerely,

Digitally signed by Mark E. Detterman
DN: cn=Mark E. Detterman, o, ou, email, c=US
Date: 2012.05.31 11:00:03 -07'00'

Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

cc: Donna Drogos (sent via electronic mail to donna.drogos@acgov.org)
Mark Detterman (sent via electronic mail to mark.detterman@acgov.org)
Electronic File, GeoTracker



LEGEND

MW-1	SJC Monitoring Well (Oak Walk)	B-2	Clayton Boring	SMW-1	SECOR Monitoring Well
MWT-1	SJC Temporary Monitoring Well (Oak Walk)	B-2	ERM Boring (6/06)	AEGP-6	APEX Envirotech , Inc. Boring
BC-1	SJC Environmental Boring (Oak Walk)	MW-B1	Kozel Property Monitoring Well	SJC MW-T1	SJC Temporary Monitoring Well (SNK Andante)
BG-1	SJC Geotech Boring (Oak Walk)		URS Geoprobe Soil Boring		Paleo Streambed, Gravelly Areas
CPT-1	Cone Penetrometer Test Location (Oak Walk)	RGA-B17	RGA Environmental boring	ET1-S-6	Trench Soil Sample Location
	Exploratory Trench	WCW-1	Woodward-Clyde Soil Sample	MW-D1	Dunne Paints Monitoring Well
	Underground Storage Tank (removed)	LFSB-14	Levine - Fricke Soil Boring	HP-2	ASE Boring
WCEW-1	Woodward-Clyde Extraction Well	LFB-1	Levine - Fricke Soil Boring	BH-S	ASE Temporary Well
OB-6	Clayton Monitoring Well (CW) & Temporary Monitoring Well (OB)	LMW-LF-2	Levine - Fricke Monitoring Well	ESC-MW-1	Environmental Strategies Corp Monitoring Well
		HEB-2	Harza Exploratory Boring		

Figure 3
Site Vicinity Aerial Photograph
California Linen Rental Company
989 41st Street
Oakland, California

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Base Map From:
The San Joaquin Company, Inc., January 27, 2007
and Google Earth, October 2009

P&D Environmental, Inc.
55 Santa Clara Avenue, Suite 240
Oakland, CA 94610

0 80 160
Approximate Scale in Feet

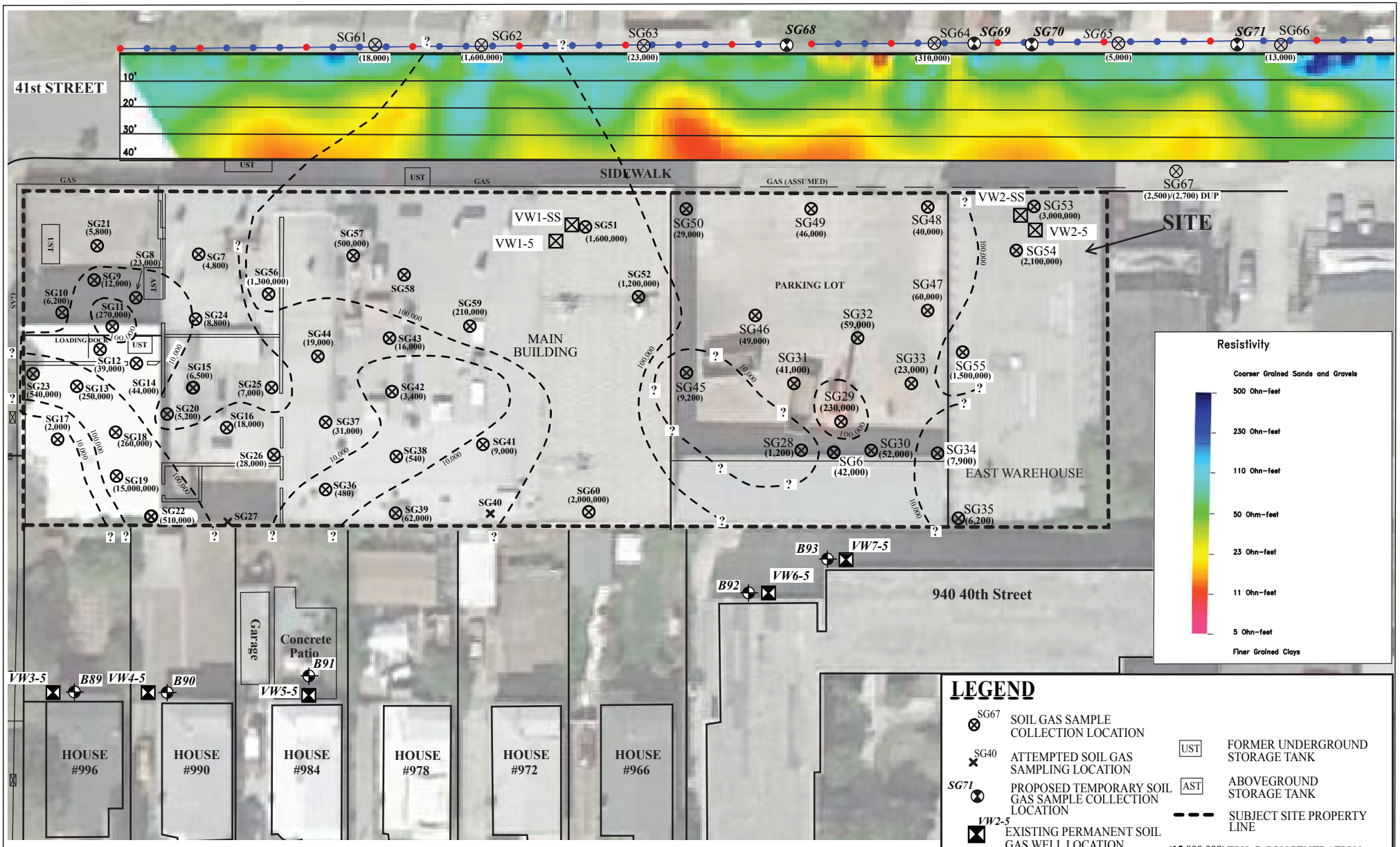

Figure XX
Resistivity Profile and Proposed Sample Collection Locations
California Linen Rental Company
989 41st Street
Oakland, California

Base Map From:
California Utility Survey Utility Sketch Plan, Feb. 14, 2005, Google Earth, June 2007, and JR Associates, June 2011

P&D Environmental, Inc.
55 Santa Clara Avenue, Suite 240
Oakland, CA 94610

0 25 50
Approximate Scale in Feet

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