EDA COUNTY

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ALAMEDA COUNTY HEALTH CARE SERVICES







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June 29, 2015

Linda Hothem Linda Hothem Trust 104 Caledonia Street, #C Sausalito, CA 94965-1952

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City of Oakland Department of Public Works c/o Mark Johannes Arniola 250 Frank H. Ogawa Plaza, Suite 5301 Oakland, CA 94612 Sent via e-mail to marniola@oaklandnet.com

Subject:

Fuel Leak Case No. RO0000379 and Geotracker Global ID T0600101442, City of

Oakland/Union 76, 670 98th Avenue, Oakland, CA 94603

Ladies and Gentlemen:

Thank you for attending the meeting at our office on Tuesday February 10, 2015. The purpose of the meeting was to discuss our evaluation of the site data in reference to the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP), identify possible technical data gaps, and develop a path to case closure. ACEH understands that redevelopment is not currently under consideration and commercial property usage will continue.

The site was previously occupied by a Union 76 service station from approximately 1947 through 1983. Prior to 1966 the service station had at least one underground storage tank (UST). In 1966 the service station was demolished and the UST was likely removed. In 1966 a new service station was constructed and two 10,000 gallon USTs and one 280-gallon waste oil UST were installed; in 1983 this service station and USTs were removed. Subsequent subsurface investigations were conducted in 1989 detected maximum soil contaminant concentrations of 25,000 milligrams per kilogram (mg/kg) Total Petroleum Hydrocarbons as Gasoline (TPHg), 23 mg/kg benzene, 270 mg/kg toluene, 190 mg/kg ethylbenzene, and 1,000 mg/kg total xylenes (BTEX). In 1989, during the widening of 98th Avenue, workers encountered contamination while excavating a water line trench at the site. Soil samples collected from the trench were reported to have contained up to 350 mg/kg TPH.

ACEH has evaluated the data in conjunction with the case files, and LTCP. Based on ACEH staff review, we have determined that the site fails to meet the LTCP General Criteria b (not petroleum only release), d (Free Product), e (Site Conceptual Model), f (Secondary Source Removal), g (soil or groundwater has been tested for MTBE), Media-Specific Criteria for Groundwater, Media-Specific Criteria for Vapor Intrusion to Indoor Air, and the Media-Specific Criteria for Direct Contact.

ACEH requests that you prepare a Data Gap Investigation Work Plan that is supported by a Site Conceptual Model (SCM) to address the identified data gaps discussed during our meeting.

TECHNICAL COMMENTS

LTCP General Criteria b (Unauthorized Release Consists Only of Petroleum) - For purposes 1. of this policy, petroleum is defined as crude oil, or any fraction thereof, which is liquid at standard