



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

September 20, 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 Second Five Year Review for Fuel Leak Case No. RO0000514; (Global ID # T0600101039); Pacific Supply, 1735 24th Street, Oakland CA 94607

Dear Mr. Cullen and Mr. Trommer:

ACEH has received the second 5-Year Review Summary Report dated January 26, 2012 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 (March 11th). 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.

ACEH Case: RO0000514
USTCF Claim: 2343
Global ID: T0600101039
Site Name: Pacific Supply
Site Address: 1735 24th Street, Oakland CA

USTCF Recommendations from January 26, 2012 Review Summary:

- UPDATE, January 2012, source area well VRW-4 has historically had elevated concentrations of residual petroleum hydrocarbons in groundwater. However, after two decades of monitoring, the groundwater plume is largely limited to the source area. Groundwater within the source area will likely remain above WQO's for years to decades. The affected shallow groundwater is not used as a source of water supply nor is it likely to be used as one in the foreseeable future. Water users in the vicinity of the Site are supplied by the East Bay Municipal Utility District. Based on the facts in the record, hydrologic and geologic conditions at the Site, the limited residual petroleum hydrocarbons that remain in the soil and groundwater pose a low risk to human health, safety and the environment. The Fund staff recommends that the Alameda County LOP consider this site for low risk closure.

Initial ACEH Response: ACEH is not in agreement with this recommendation. ACEH is in general agreement that the site is likely mature and the SVE system, which operated from 1994 to mid-1996, was successful in reducing the concentrations of pollutants; however, potentially significant data gaps appear to be present in site understanding. The preferential pathway study (PPS) performed by Brunsing Associates, Inc. (Brunsing), with a report date of December 20, 2010, did not address any on-site pathways, such as sewer laterals or other utilities. Groundwater at the site has been reported as shallow as 3.37 feet below the ground surface. The PPS concluded that offsite sanitary sewer and storm water sewer trenches do intersect

the groundwater table. In the Conclusions and Recommendation section of their report Brunsing acknowledged a data gap with regard to off-site contaminant migration and recommended a monitoring well be installed in 24th Street. No additional study has been implemented to address this data gap. Until this data gap is addressed we cannot state the contaminant plume is largely limited to the source area, nor can we conclude the plume is stable or decreasing in extent.

The most recent soil and groundwater investigation, performed in 2005, advanced 10 confirmation borings assess the effectiveness of the SVE system. The 2005 study identified TPHg concentrations up to 5,700 mg/kg (confirmation boring CB-8) remained in site soils adjacent to the office suite portion of the warehouse/office building. Additionally, two of the confirmation borings demonstrated significant pollutant concentration increases since the SVE system shut down. No investigation has been performed beneath the warehouse/office building so the limits of pollution impacts have not been demonstrated. Prior to closure ACEH continues to recommend a soil vapor study be performed to address the vapor intrusion data gap.

Additional Comments: The USTCF has recommended the site be considered for closure based on a review of groundwater concentrations remaining in groundwater in existing wells at the site. One grab groundwater sample was recovered during the 2005 the confirmation sampling at a depth of eight to 10 feet bgs (confirmation boring CB-3). The water sample was reported to contain 23,000 µg/L TPHg and 1,100 µg/L benzene in site groundwater. A water sample was not recovered from the boring of the soil sample exhibiting the highest TPHg concentration (CB-8). All on-site groundwater monitoring wells have had submerged well screens since their date of installation. The wells each have a 10-foot screen length. Long screen lengths average groundwater concentrations over the length of the screen and typically represent a weighted average of concentrations across the screen. Submerged screens may bias-low actual pollutant concentrations for chemicals having a density less than 1.

Thank you for your cooperation. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Sincerely,

Keith Nowell, PG, CHG
Hazardous Materials Specialist

cc: Donna Drogos (sent via electronic mail to donna.drogos@acgov.org)
Keith Nowell, ACEH (sent via electronic mail to keith.nowell@acgov.org)
GeoTracker
Electronic File