



HYDRO ANALYSIS, INC.

*Environmental & Water Resources Engineering
Groundwater Consultants*

June 11, 2003

Carl Searway
3032 Dakota Street
Oakland, CA 94602

RE: Searway Property
649 Pacific Ave & 1713 Webster Street
Alameda, CA

Dear Mr. Searway:

This letter is provided as a follow-up to our recent meeting regarding the Searway Property in Alameda. I have reviewed the "Subsurface Site Investigation Report" by Stellar Environmental Solutions dated March 2003. The subsurface investigation was conducted within the area of a former dry cleaners (649 Pacific Ave) and within the restaurant space that is also an area of a potential underground fuel storage tank (1713 Webster St).

Former Dry Cleaners

The results of the investigation at the location of the former dry cleaners indicated the presence of elevated concentrations of Stoddard Solvent in the soil and shallow groundwater. Although some further subsurface investigation will certainly be necessary at this location, I do not recommend proceeding at the present time. I feel that it would be

most prudent to first report the findings to the California Regional Water Quality Control Board (RWQCB), then meet with RWQCB staff in order to come to some agreed-upon course of action.

Although more refined delineation of the soil & groundwater concentrations within the source area may be important, it is likely that the RWQCB will require down-gradient shallow groundwater monitoring (monitoring well) in any case. The development of an investigation workplan following interaction with RWQCB technical staff is likely to result in a scope of work that will satisfy all of the identified issues, while possibly lessening the actual scope-of-work (the installation of a monitoring well may lessen, or eliminate entirely, the need for additional soil borings within the source area).

It is important to note that any reasonable investigation workplan is typically approved by the RWQCB, with the intent that further investigation will be conducted as deemed necessary. By first meeting with RWQCB technical staff, you decrease the chances of having to come back for an additional investigation (the agreed-upon workplan will satisfy all of the identified issues).

Restaurant Space

The results of the investigation in the restaurant space indicated the presence of elevated concentrations of MTBE and Extractable-Range Hydrocarbons in the shallow groundwater. In the report by Stellar Environmental Solutions, it was concluded that "*the distribution of MTBE suggests an on-site release*" and that "*the detection of the more persistent MTBE and longer-chain diesel fuel-range hydrocarbons suggest that the contamination is quite old.*"

I do not agree with the conclusions made by Stellar Environmental for the following reasons:

- 1) Since there were only a limited number of sampling locations, the groundwater concentrations are based on "grab" groundwater sampling, and the concentrations are not markedly different between most of the locations, there is really no strong evidence of any on-site source.
- 2) The presence of only MTBE due to "old" contamination is not consistent with a typical gasoline leak site. Typically, Benzene and other gasoline components would be more persistent. Due to its high mobility in groundwater, the MTBE typically becomes diluted at a much quicker rate than other gasoline components. The fact that MTBE is present with no detectable concentrations of either Benzene, Toluene, Ethylbenzene or Xylenes (BTEX), provides a strong indication the MTBE has migrated from an off-site source. At a typical gasoline leak site, the MTBE plume in shallow groundwater will extend a much greater distance down-gradient than plumes associated with any of the BTEX components. Therefore, the MTBE plume from an up-gradient source could be reaching the Searway property, while plumes of Benzene and other gasoline components are not.
- 3) With lack of any detectable BTEX in the groundwater samples, the presence of longer-chain diesel fuel-range hydrocarbons due to "old" contamination seems highly improbable. More likely, the longer-chain diesel fuel-range hydrocarbons are associated with either the lighter fraction of waste motor oil or else are the result of laboratory quantification of hydraulic oil against a diesel standard (hydraulic lifts had been present at one time).

The Alameda County Health Care Services Agency would provide oversight of a fuel leak case, and as such, the concentrations detected beneath Searway property should be reported at some point in the near future. At this time, however, I recommend a research of sites in the surrounding area. On the chance that the MTBE concentrations in the shallow groundwater beneath the Searway property can be associated with some well-defined off-site source, there may be the opportunity to place the burden of cost for further investigation, risk assessment and/or corrective action upon a third party.

If you wish to discuss these matters further, please call me at (510)620-0891.



Gary Aguiar
Principal Engineer
California Civil 34262

This has been done and I have enclosed the results for 1629 Webster St which appears upgradient of my property.