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February 3, 2004

Mr Barney Chan Hazardous Materials Specialist Alameda County Health Care Services Agency 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577

Underground Storage Tank (UST) Removal SUBJECT:

Soil Excavation and disposal at

St. Francis Pie Company

1125 67th Street

Oakland, California 94608

Dear Mr. Chan:

On December 2, 2003, TEC Accutite removed one 10,000-gallon gasoline underground storage tank (UST) from St. Francis Pie Co. site at 1125 67th Street, Oakland, California. After the UST removal, the generated stockpile was temporarily placed in the excavation pending receiving the analytical results. Rain water has accumulated in the excavation. The laboratory analysis of the samples collected from the excavation and soil stockpile detected noticeable concentrations of the fuel additive Methyl tertiary butyl ether (MTBE). Concentrations of Total Petroleum Hydrocarbons as gasoline (TPH-G), Benzene, Ethyl benzene, Toluene, and Xylenes (BTEX) were non-significant to non-detected. Please see the attached figure and table of analytical findings. A Maximum MTBE concentration of 7.06 parts per million (ppm) was detected in the tank excavation and 0.238 ppm was detected in the soil stockpile, generated after the UST removal. The Tier 1 conservative Environmental Screening Levels (ESLs) for MTBE in shallow soil are as follows:

2 ppm for the protection of indoor air for residential land use*

5 6 ppm for the protection of indoor air for commercial land use*

0.023 ppm for groundwater protection (soil leaching) when water is a current or potential drinking water resource*

8.4 ppm when for groundwater protection (soil leaching) when water is not a current or potential drinking water resource*

MTBE concentrations in the soil exceeded the ESLs in shallow soil for the protection of indoor air for residential and commercial land use and the ESL for current or potential drinking groundwater protection. Due to elevated concentrations of MTBE in the soil, TEC Accutite recommends the following:

Pump out the accumulated rain water from the excavation and dispose of the water into the sewer by a discharge permit. If a discharge permit could not be obtained, the plan is to use a vacuum truck and send the water to a permitted facility according the water profile. We estimate 8,000 to 10,000 gallons of water to be pumped out and disposed of. Once the water is recharged, collect a grab groundwater sample and analyze it for TPH-G, BTEX by EPA Method 8015/8020 and for fuel oxygenates (including MTBE) by using EPA method 8260.

- Excavate the MTBE impacted soil which was temporarily placed in the excavation.
- Over-excavate to the extent possible, the MTBE impacted soil in the former UST location, piping trench and dispenser island areas.
- Transport and dispose of the accumulated MTBE impacted soil at a regulated landfill (Class III or II permitted landfill). We estimate 150 to 200 tons of soil to be excavated and disposed of.
- Following the soil excavation and disposal, collect confirmation soil samples from the excavation, piping trench, and under the former dispenser island. We estimate to collect the samples from the walls of the excavation, since there is water accumulated up to four feet below surface grade. We recommend avoiding collecting wet samples. The number of samples and depth will be agreed upon with the inspector from Alameda County Health Care Services Agency in the field. As a preliminary estimate, we plan to collect four soil samples from the excavation (one sample from each wall, above water), one soil sample from every 20 feet of piping run, and one confirmation sample from under the former dispenser island. All samples will be analyzed for TPH-G. BTEX by EPA Method 8015/8020 and for fuel oxygenates (including MTBE) by using EPA method 8260.
- Once the soil is excavated and disposed of, TEC Accutite will import clean fill, compact and backfill the excavation.
- Conduct a subsurface investigation at this site to characterize the MTBE plume on and offsite. TEC Accutite recommends preparing a workplan for site characterization and obtaining approval from Alameda County Health Care Services Agency prior to commencing field activities.

At this time, the soil excavation, disposal, and backfilling are urgent. Your approval of the above tasks is greatly appreciated. Thank you for your cooperation and assistance on this project. If you have any questions, please call the undersigned at (650) 952-5551, Ext. 209.

Sincerely,

TEC Accutite

Sami Malaeb, PE, REA

Environmental Director

*Reference: "Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater", California Regional Water Quality Control Board, San Francisco Bay Region, Interim final-July 2003.

cc: Mr. John Bushini, 1260 Shell Circle, Clayton, CA 94517



TABLE: Summary of Soil Analytical Data - St. Francis Pie Co., 1125 67th Street, Oakland, CA

Sample ID	Depth (fbg)	Date	TPHg	В	T	E	Х	MTBE	ETBE	TAME	DIPE	TBA	1,2DCA	1,2EDB	Ethanol	Lead
	(tog) Concentrations in parts per million (ppm)															
TP-N	14	12/2/2003	<0.5	<0.005	<0.005	<0.005	<0.010	7.06	<0.01	0.295	<0.01	4.40	-0.04			
TP-S	14	12/2/2003	<0.5	<0.005	<0.005	<0.005	<0.010					1.43	<0.01	<0.01	<1	
TP-C	14							0.045	<0.005	<0.005	<0.005	<0.25	<0.005	<0.005	<0.5	
=	14	12/2/2003	<0.5	<0.005	<0.005	<0.005	<0.010	0.167	<0.005	0.008	< 0.005	<0.25	< 0.005	< 0.005	<0.5	
DISP-2	2	12/2/2003	2.06	0.052	0.006	0.009	0.036	1.11	<0.005	0.053						
SP (1-4)	stockpile	12/2/2003	3	-0.00E							<0.005	1.52	<0.005	<0.005	<0.5	
()	Stockhile	1222003	3	<0.005	0.006	0.026	0.029	0.238	<0.005	0.012	< 0.005	0.253	< 0.005	< 0.005	<0.5	14.

Notes:

TP-N = Soil sample collected 14 fbg beneath the UST at the north end of excavation.

TP-S = Soil sample collected 14 fbg beneath the UST at the south end of excavation.

TP-C = Soil sample collected 14 fbg beneath the UST at the center of excavation.

SP (1-4) = Composite soil sample of excavated soil.

TPHg = Total petroleum hydrocarbons as gasoline (EPA Method 8015)

BTEX = Benzene, Toluene, Ethylbenzene, Xylenes (EPA Method 8020)

Fuel Additives = Methyl-tert-butyl ether (MTBE), Ethyl tert-butyl ether (ETBE), tert-Amyl methyl ether (TAME), Di-isopropyl ether (DIPE),

tert-Butyl alcohol (TBA), 1,2-Dichloroethane, 1,2-Dibromoethane, Ethanol (EtOH) by EPA Method 8260

Lead = Total lead (EPA Method 6010)

<X = Concentration less than laboratory reporting limits

* = Confirmed by EPA Method 8260

--- = Not available

fbg = Feet below grade

