



November 3, 2008

Mr. Paresh Khatri
Hazardous Materials Specialist
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Number 250
Alameda, California 94502

Alameda County
NOV 04 2008
Environmental Health

Subject: **Response to Comments**
Former Sears Auto Center #1058
2633 Telegraph Ave.
Oakland, California
Case I.D. # RO0002600
For Sears Holdings Management Corporation

Dear Mr. Khatri:

The following are responses to comments provided in the September 19, 2008, Alameda County Environmental Health Services (ACEHS) correspondence. ACEHS requested that their technical comments be addressed and the requested technical reports submitted. ACEHS' comments are italicized and URS' responses are provided in regular text below each comment.

Technical Comments

1. *Site Conceptual Model - Prior to conducting the subsurface investigation proposed in the October 5, 2005 report, preparation of a Site Conceptual Model (SCM) for the Site may be advantageous at this time. An SCM, should synthesize all the analytical data and evaluate all potential exposure pathways and potential receptors that may exist at the Site, including identifying, developing, or updating site cleanup levels and cleanup goals, in accordance with the San Francisco Regional Water Quality Control Board Basin Plan and appropriate ESL guidance for all COCs and the appropriate groundwater designation. Please note that soil cleanup levels should ultimately (within a reasonable timeframe) achieve water quality objectives (cleanup goals) for groundwater in accordance with the San Francisco Regional Water Quality Control Board Basin Plan. At a minimum, the SCM should include:*
 - 1) *Local and regional plan view maps that illustrate the location of sources (former facilities, piping, tanks, etc.) extent of contamination, direction and rate of groundwater flow, potential preferential pathways, and location of receptors;*
 - 2) *Geologic cross section maps that illustrate subsurface features, man-made conduits, and lateral and vertical extent of contamination;*
 - 3) *Plots of chemical concentrations versus time;*
 - 4) *Plots of chemical concentrations versus distance from source;*
 - 5) *Summary tables of chemical concentrations in different media (i.e. soil, groundwater, and soil vapor); and*
 - 6) *Well logs, boring logs, and well survey maps;*
 - 7) *Discussion of likely fate and transport.*

URS Corporation
2020 East First Street, Suite 400
Santa Ana, CA 92705
Tel: 714.835.6886
Fax: 714.667.7147

If data gaps (i.e. potential contaminant volatilization to indoor air or delineation of soil and groundwater impact, etc.) are identified in the SCM, please include a proposed scope of work to address those data gaps in the SCM due by the date specified below. Please note the scope of work must address all technical comments presented in this correspondence and all data gaps identified in the SCM.

Response – An SCM report will be prepared with the requested information. Our recommendation, however, is that the three soil borings and the one hydropunch sample proposed in the October 5, 2005 Annual Groundwater Monitoring Report be advanced as part of the SCM development, so that the remaining data gaps can be addressed as part of the overall analysis of the remaining steps to achieve site closure. URS will plan to complete these borings by mid-December 2008.

It should also be noted that a significant portion of the requested information has been included in previously submitted reports including the Additional Site Assessment and 2002 First Quarter Groundwater Monitoring Report (dated August 27, 2002) and the 2005 Annual Groundwater Monitoring Report (dated October 5, 2005). The SCM report will summarize these prior analyses/data and provide appropriate updates as needed on the following items:

- Soil chemical concentration data in Appendix A of the 2002 report;
- Fate and transport of the free product in Section 12.1 of the 2002 report;
- Groundwater chemical concentration data in Appendix F of the 2005 report;
- The conduit/preferential pathway study in Section 5.0 of the 2005 report;
- A map and cross sections showing the utility locations as Figures 2, 3, and 4, respectively, of the 2005 report; and
- The well survey data in Appendix B of the 2005 report.

2. *Free Product Abatement Status – URS reported that a SoakEase™ absorbent sock was installed in groundwater monitoring well FOMW-1 to abate the consistently detected free product and that the sock was replaced in November 2005. At this time, please evaluate the effectiveness of the interim cleanup activities at the site by the date specified below. This may be included in the SCM requested above.*

Response – As discussed in the 2002 report, the free product in well FOMW-1 is a nearly 40-year old, highly viscous, molasses- to tar-like substance, which cannot be pumped or bailed from the well. The only potential removal mechanism is through physical contact/smearing over the surface of a material like the absorbent sock, which is not very effective. This type of thick material has no potential for further migration. The material has also been demonstrated to have little to no impact on groundwater quality given the lack of detectable concentrations in the four other wells located on-site. Additional information on the current status of the free product will be discussed in the SCM report.

3. *Groundwater Contaminant Plume Monitoring – In order to evaluate groundwater contaminant plume stability and effectiveness of free product abatement, consecutive groundwater monitoring must be conducted. According to our records, the most recent groundwater monitoring event was conducted on March 21, 2005. Please initiate semi-annual groundwater monitoring at the site. Prior to collecting groundwater samples, it is recommended that the monitoring wells be re-developed so that groundwater samples representative of actual site conditions are collected. Also please rehabilitate any wells that may be compromised prior to sampling. Your consultant may propose and justify an alternate groundwater monitoring plan for review. This may be incorporated into the above requested SCM.*

Response - The groundwater monitoring wells will be assessed for excessive solids build-up and then re-developed as necessary prior to sampling. Two of the site wells (FOMW-2 and FOMW-3) were destroyed during site redevelopment. The remaining three wells, however, should still provide adequate data for the SCM report. These wells will be sampled/checked for free product in mid-November 2008. Sampling results will be provided in the SCM. If the results are consistent with the March 2005 results (non-detect for BTEX, TPHd, TPHg, and TPHss), it is our opinion that the site will be ready for closure.

Technical Report Request

Submit the following reports by the indicated due date:

- *October 30, 2008 – Quarterly Monitoring Report*
- *November 10, 2008 – Site Conceptual Model & Interim Remedial Action Evaluation*
- *April 30, 2009 Quarterly Monitoring Report (1st Quarter 2009)*

Response - An extension to the submittal of the 2008 semi-annual (versus quarterly) groundwater monitoring event is requested as site access and approval for sampling need to be re-established with Sears and the current property owner. The sampling event is tentatively scheduled for mid-November pending completion of these access activities. Rather than submitting a separate report, however, it is our recommendation that the data be incorporated into the SCM report.

An extension to the submittal of the Site Conceptual Model report is requested until January 30, 2009 to allow the December 2008 soil and November 2008 groundwater sampling data to be incorporated into the report.

If groundwater data from November 2008 show no detectable contamination and no change in free product conditions, similar to the March 2005 event, and soil data show no significant contamination, it is our opinion that no further action for the site is appropriate, and site closure will be requested in the SCM report.



ACEHS
November 3, 2008
Page 4 of 4

Feel free to contact me at (714) 648-2779 if you have any questions or comments regarding the responses to ACEHS comments and requirements.

Respectfully submitted,
URS CORPORATION

A handwritten signature in black ink, appearing to read 'Joseph R. Liles', written in a cursive style.

Joseph R. Liles, P.G., C.HG.
Project Manager

cc: Mr. Bruce Kaye – Sears Holdings Management Corporation