

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



F

August 7, 2007

Mr. Mike Reynolds
The 311 Company, LLC
125 2nd St., Suite C4
Oakland, CA 94607

Mr. Ray Weymouth
Meyer Plumbing Supply
311 2nd St.
Oakland, CA 94607
(415) 567-6700
FAX (510) 337-9335

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Dear Messrs. Weymouth and Reynolds:

Subject: Fuel Leak Site, RO0002906 & Global ID SL0600180448, Formerly The Olson Company, 311 2nd St., Oakland, CA 94607

Alameda County Environmental Health (ACEH) has received and reviewed the May 14, 2007 Site Management Plan, The Colony Development, 311 Second Street, Oakland, California for the subject site prepared by Treadwell and Rollo. We understand that property has been sold to Embarcadero Pacific and their plans for the site are similar to that of the Olson Co. The site will be developed into a multi-storied residential building built upon two floors of at grade parking. Our office's comments are based upon this understanding. Treadwell and Rollo presents in their Site Management Plan, future remediation actions, site and administrative controls, which they believe will allow for the planned development.

The site is in an industrial/commercial area, bound by office buildings, an asphalt parking lot, the Amtrak railway and Embarcadero Street. A commercial building occupied the address from 1939 to 1959. This building operated as a steel fabricating and welding shop from approximately 1950-1957. The current warehouse has been at the site since at least 1965. Mr. George Myer purchased the property in May 1978. At this time a buried UST, closed-in-place, was located along the southeast corner of the site, outside the warehouse. Subsequent investigations of this tank by Blymyer Engineers and AllPro Environmental were performed in 1993 and 1996, respectively. It appeared that diesel contamination remained adjacent to the closed-in-place tank but not in the assumed down-gradient location. The UST case was closed in 1996 by ACEH based upon this investigation and for the current commercial use of the property. The potential residential development prompted additional investigation at the site. SECOR advanced four borings around the UST and two borings further up-gradient of the UST, inside the building. These results identified TPHd down-gradient of the UST in groundwater (B-1), TPHg in groundwater up-gradient of the UST (B-3) and potential up-gradient TPHd and HVOCs sources from either on or off-site in boring B-6. To investigate up-gradient sources of TPH and HVOCs, four borings, SW-1 through SW-4, were drilled along the outside perimeter of the site along 2nd St. as well as one boring, SW-5, down-gradient along Harrison St. HVOCs were detected in groundwater samples up-gradient of the site, but no sources of TPH were detected. Petroleum UST release sites, however, were identified up-gradient of the site through various database reviews.

Our office has the following technical comments for you to address and requests you submit the reports requested below.

TECHNICAL COMMENTS

1. Location of Former Buildings- The site history states that a commercial building was operated as a steel fabricating and welding shop from 1939 to 1959. Please clarify where this building was located and whether the current building at the site is the same, different or a modification of this original building. Please provide copies of Sanborn maps to support your response. Are there any maps or reports noting what or where chemicals were used or stored at the former businesses at this site? Based upon this information, please comment on whether additional site characterization is warranted in your Phase I report.
2. Presence of Halogenated Volatile Organics- Assuming no potential on-site sources for HVOCs are identified in the information requested in item 1, no further investigation for HVOCs at this site appears warranted.
3. Lead Analysis- Elevated lead concentrations have been reported in soil samples both inside and outside the existing building. The source of the lead contamination does not appear to be associated with the former UST. Assuming no potential on-site sources for lead are identified in the information requested in item 1, our office believes that lead contamination in soil will not require additional characterization. All excavated soil must be properly disposed. Reuse of soil must meet Cleanup Imported Fill Material requirements described by the Department of Toxic Substances Control (DTSC). Lead contamination identified will be characterized and its lateral and vertical location, noted on a site map to be included in your deed restriction.
4. TPH contamination – The presence of TPHg in groundwater in boring B-3 and TPHd in boring B-6 must be further investigated. Each of these detections appear to have originated from an on-site source, which should be delineated. We therefore, recommend additional sampling up-gradient of B-3 and down-gradient of B-6. Please provide a soil and groundwater sampling plan as requested below.
5. Soil and Groundwater Cleanup Levels- The Treadwell & Rollo SMP indicates that soil and groundwater cleanup goals around the UST shall be the cleanup levels for shallow soils, commercial setting, for groundwater not a drinking water source ie TPHd: 500 ppm and TPHg: 400 ppm and 2500ppb and 5000 ppb, for TPHd and TPHg, respectively. Our office would like to clarify that these cleanup levels are appropriate within the following site specific conditions:
 - Groundwater is shown to be non- potable based upon TDS, conductivity, pump rate or other acceptable measurement
 - The TPH release in soil and groundwater is defined and does not pose a risk to off-site receptors
 - The construction of the development includes two floors of at surface parking above which will be residential buildings and no exposed soil exists on the ground floor, or if it does exist, it shall meet shallow soil residential standards.
 - Concentrations of TPH in soil and groundwater above residential ESLs are noted on site figures and included in a deed restriction

6. **Underground Storage Tank Soil and Groundwater Contamination-** We understand that the closed-in-place UST will be removed as part of the site re-development activities. Although unspecified in location and number, soil and groundwater samples will be collected at this time. We recommend sampling consistent with the Minimum Verification Analysis for Underground Tank Leaks used by Unidocs Member Agencies. Based upon the initial investigation by Secor from boring B-1, the initial diesel release from this tank may not be defined in groundwater. Therefore, it is unclear whether the UST closure should remain closed or the case reopened. We believe that additional sampling beyond the property boundary will be necessary to define the extent of the plume. We recommend that impacted soil and groundwater removal be done at the time of the tank removal. Please provide a map indicating additional off-site sample locations as requested below.

TECHNICAL REPORT REQUEST

Please submit the following technical report according to the following schedule:

- September 10, 2007- Phase I report, Work Plan for Soil and Groundwater Investigation

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Please do not submit reports as attachments to electronic mail. Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website at (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting) for more information on these requirements.

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at barney.chan@acgov.org.

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

If you have any questions, please call me at (510) 567-6765.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: files, D. Drogos
Messrs. D. Kleesattel and G. Leong, Treadwell & Rollo, 501 14th St., Third Floor,
Oakland, CA 94612

Leroy Griffin, OFD

8_2_07 311 2nd St