

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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October 29, 2007

ENVIRONMENTAL HEALTH SERVICES

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

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

Mr. Ray Weymouth  
Meyer Plumbing Supply  
311 2<sup>nd</sup> St.  
Oakland, CA 94607

Dear Messrs. Weymouth and Reynolds:

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

Alameda County Environmental Health (ACEH) has received and reviewed the August 15, 2007 Response to Technical Comments and Addendum to the Site Management Plan The Colony Development, 311 2nd Street, Oakland, California for the subject site prepared by Treadwell and Rollo. This addendum responds to the County's August 7, 2007 technical comment letter, which responded to Treadwell and Rollo's original May 14, 2007 Site Management Plan. This addendum adequately addresses the County's technical comments as discussed below and is approved with the following comments and conditions.

**TECHNICAL COMMENTS**

1. Location of Former Buildings- The addendum provides historic Sanborn maps and interpretation of them. We concur that there is no indication of chemical storage or use at the site, excluding the diesel UST on the southwest corner of the property. We are, however, not convinced that a bunker oil tank was located northwest of the site as stated in the report.
2. Lead Analysis- No sources for the lead contamination found were identified in the Sanborn maps, however, lead concentrations exceeding residential ESLs will be characterized and their lateral and vertical location, noted on a site map to be included in your deed restriction. In addition, all other residual contaminants exceeding their respective residential ESLs must also be included on site figures in your deed restriction.
3. TPH contamination – The presence of TPHg in groundwater in boring B-3 and TPHd in boring B-6 will be further investigated by sampling up-gradient of boring B-3 and both up- and down-gradient of B-6. Soil and groundwater samples will be collected. Results will be provided in a Completion Report along with recommendations.
4. Soil and Groundwater Cleanup Levels- Those provided in Alameda County's previous 4/24/06 letter were suggested as appropriate under the following 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

Please note that **all** conditions must be met to use these cleanup levels. In addition, if a Corrective Action Plan (CAP) is required, the plan must go through public participation prior to implementation.

5. **Underground Storage Tank Soil and Groundwater Contamination-** In addition to the normal UST sampling required for the tank removal, additional excavation as necessary to meet the referenced clean-up levels is proposed. The petroleum contamination previously identified in groundwater in borings B-3 and B-1 should be investigated either during the tank removal or with additional borings.

#### TECHNICAL REPORT REQUEST

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

- November 30, 2007- Underground Tank Removal Report & Soil and Groundwater (Completion) Report.

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](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](mailto: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  
Sr. Hazardous Materials Specialist

cc: files, D. Drogos

Messrs. D. Kleesattel and G. Leong, Treadwell & Rollo, 501 14<sup>th</sup> St., Third Floor,  
Oakland, CA 94612

Leroy Griffin, OFD