

Nowell, Keith, Env. Health

To: Shirley Thompson
Cc: Joseph Cotton; Roe, Dilan, Env. Health
Subject: Ammended Request for Fuel Leak Case No. RO0002933 and GeoTracker Global ID T0600158621, Thompson Property, 1409-1417 12Tth St., Oakland, CA 94607

Dear Ms. Thompson,

This is a follow up email to our phone call of August 20, 2013 to your consultant Mr. Joseph Cotton of Impact Environmental (Impact). Alameda County Environmental Health (ACEH) has recently conducted a thorough review of the case file in conjunction with the new State Water Resources Control Board's Low Threat Underground Storage Tank Case Closure Policy (LTCP) to evaluate the site's eligibility for closure as a low-threat site, including the following document entitled *Closure Verification Soil and Soil Vapor Sampling Report (Work Plan)*, dated March 19, 2013. The Work Plan was prepared by Impact for the subject site on your behalf. The Work Plan proposes the excavation of two areas having residual contamination, and the decommissioning of monitoring wells within the proposed areas of excavation. The areas proposed for excavation are defined by borings CSB-1 and by CSB-6. The analytical data for these borings do not appear to be supported by the data from the adjacent wells.

Based on the ACEH review, the proposed excavation may not be necessary to meet the criteria of the LTCP. Prior to making a final determination on the appropriateness of the proposed excavation ACEH requests that you conduct the following:

1. Submit a work plan to advance two borings, one each in the immediate vicinity of borings CSB-1 and by CSB-6 and collect soil samples at depths similar to those in the above referenced report - 5, 7, 10, 12, and 15 feet below the ground surface (bgs) and a soil sample from CSB-1 at a depth of 18 feet bgs. Additionally please collect a soil sample from within the 0- to 5-foot zone from each of the two borings to satisfy the LTCP Media Specific Criteria for Direct Contact and Outdoor Air Exposure. Submit the work plan to ACEH by the date specified below;
2. The elevated laboratory reporting limits for BTEX and MTBE in borings CSB-1 and by CSB-6 makes it difficult to evaluate this case for closure against the LTCP. It appears the elevated laboratory reporting limits for CSB-6 are due to the high concentration of TPHg. It may be the TPHg and BTEX are reported from the same test run (such as EPA test method 8260). ACEH recommends analyzing TPHg by another method, such as EPA 8015, that may lower the BTEX reporting limit in the 8260 scan. Please contact the analytical laboratory to determine how to best lower the BTEX and reporting limits using the data from borings CSB-1 and by CSB-6 as example concentrations. Include a discussion of your findings in the work plan.
3. Analyze all samples for total petroleum hydrocarbons as gasoline (TPHg), total petroleum hydrocarbons as diesel (TPHd), total petroleum hydrocarbons as motor oil (TPHmo), benzene, toluene, ethylbenzene, xylenes (BTEX) the fuel oxygenates methyl tertiary butyl ether (MTBE), diisopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), and tertiary butyl alcohol (TBA), and the lead scavengers 1,2-dibromroethane (EBD) and 1,2-dichloroethane (1,2-DCA. Analyze the soil samples collected in the upper 10 feet bgs for naphthalene to satisfy the LTCP Media Specific Criteria for Direct Contact and Outdoor Air Exposure;
4. Please run silica gel cleanup for the samples analyzed TPHd and for TPHmo;
5. Review the data in the report, including the column headers, for accuracy and correctness, specifically the contaminant concentration units. Please provide ACEH with a copy of the corrected tables if errors are found.

Please submit the work plan by **September 20, 2013**.

I will be on vacation beginning August 26 with an anticipated office return date of September 9, 2013. Please contact Dilan Roe at 510 / 567 - 6767 in my absence.

Thank you,
Keith Nowell

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PDF copies of case files can be reviewed/downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>