



ENVIRONMENTAL HEALTH SERVICES
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October 13, 2014

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Subject: Fuel Leak Case No. RO0002982 (GeoTracker Global ID T10000000417), ARCO #472 / Plucky Liquors, 6415 International Boulevard, Oakland, CA 94621

Dear Responsible Parties:

Alameda County Environmental Health (ACEH) has reviewed the recently submitted document entitled *Site Management Plan (SMP)*, dated September 19, 2014 and prepared by of Broadbent and Associates, Inc. (Broadbent) for the fuel leak case BP #472 (ARCO #472/ Plucky Liquors), located at 6415 International Blvd. in Oakland, ACEH case number RO2982.

Please address the following technical comments and submit a revised Site Management Plan by the date specified below.

Technical Comments

- Section 2.1 of the SMP indicates the bioattenuation zone is located between the land surface and shallow groundwater located approximately seven feet below the ground surface (bgs). No soil sampling has been conducted in the upper five feet – the zone typical of foundation footings and utility trenches, and only three soil samples have been collected within this bioattenuation zone. ACEH is of the opinion the bioattenuation zone may not have been adequately characterized and that residual contamination may remain in shallow site soil. Section 2.2 of the SMP states hydrocarbon concentrations in groundwater are consistent with historical ranges. This statement appears to acknowledge that residual contamination does remain at the site. ACEH is concerned that the language used in Section 2.1 and Section 2.4 does not adequately reflect the possibility

that not all contamination may have been identified. In order to reflect this uncertainty, ACEH requests these sections be revised to include language to reflect this.

- Section 2.5 of the SMP states the concentrations for MTBE in MW-1 and toluene in MW-3, both from the August 25, 2009 monitoring event, are both believed to be anomalous; however, these concentrations are not flagged on the laboratory analysis report and do not appear to be suspect. The data also suggests that residual soil may remain beneath the site. The SMP is intended to address this concern.
- Drawing 2 of the SMP depicts the approximate location of former underground storage tank (UST). ACEH is of the opinion that this is a presumed location, and unless supported by facility plans or other firsthand documentation, Drawing 2 should reflect this assumption.
- Because of the presence of residual contamination, ACEH requests advanced notification of subsurface site work (e.g. utility repair, etc.) or site redevelopment, including building footprint modifications, be incorporated into the language of the SMP.

Technical Report Request

Please upload technical reports to the ACEH ftp site (Attention: Keith Nowell), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **October 20, 2014- Site Management Plan** (file name: RO00002982_SMP_R_yyyy-mm-dd)

Thank you for your cooperation. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

If your email address does not appear on the cover page of this notification ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Sincerely,

Keith Nowell, PG, CHG
Hazardous Materials Specialist

cc: Kristene Tidwell, Broadbent & Associates, Inc., Suite G, 875 Cotting Lane, Vacaville, CA (Sent via E-mail to: Ktidwell@broadbentinc.com)

Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (Sent via E-mail to: lgriffin@oaklandnet.com)

Dilan Roe, ACEH, (sent via e-mail to dilan.roe@acgov.org)
Keith Nowell, ACEH, (sent via e-mail keith.nowell@acgov.org)
Geotracker, Electronic File