## Drogos, Donna, Env. Health

From: andrew@eras.biz

Sent: Wednesday, September 05, 2012 1:56 PM

To: Drogos, Donna, Env. Health dave@eras.biz; kasey@eras.biz

**Subject:** 1244 Doolittle Drive Subsurface Investigation **Attachments:** 1244 Doolittle Dr - Limited P2 Investigation.pdf

Categories: Mail\_Cases\_RWQCB, Mail\_Cases\_Plopping

## Donna,

Attached is a report for a site that we did some work on recently where we discovered some contamination associated with a former gas station operation on the Property.

## We Concluded the following:

ERAS identified a large number of areas on the Property that were considered potential sources of contamination to subsurface conditions due to the former use of the Property as a gas station which included two sets of former USTs, pump islands, and product lines.

ERAS advanced five soil borings (B-1 through B-5) on July 18<sup>th</sup>, 2012 for the collection of groundwater samples down gradient of former USTs, pump islands, and product lines on the Property. The samples were analyzed for the presence of TPH-gro, TPH-dro, BTEX, MTBE, oxygenates, and total lead.

Concentrations of TPH-gro (260  $\mu$ g/L) and TPH-dro (230  $\mu$ g/L and 330  $\mu$ g/L) were detected above the ESL (100  $\mu$ g/L) in borings B-1 and B-5. No concentrations of BTEX, MTBE or other oxygenates, or total lead were detected above the ESL.

The sources of the contamination have been removed (USTs, pump islands, and product lines). The detected concentrations were above the ESLs but no significant concentrations of volatile constituents were detected. The concentrations of hydrocarbons detected were all below the concentrations that pose a threat to indoor air.

Based on this subsurface investigation, there has not been enough characterization of the nature and extent of groundwater contamination to adequately assess the degree of threat (if any) to human health and safety or the environment. In accordance with the California Water Code Division 7, Section 13271, because there were chemical constituents detected above current ESLs, ERAS recommends that this report be forwarded to the Alameda County Environmental Services in San Leandro for their review and for their records.

ERAS also recommends that Alameda County Environmental Services be notified that Chevron was the last known owner/operator of the USTs, and that any further remedial investigation for this site should be pursued with Chevron. Based on available records, the USTs were removed from the Property in January of 1980 during the Davis Street widening project which is prior to the purchase of the property in April of 1980. Therefore, in accordance with California HSC Code Section 25281(j) and (k), the "Operator" of the USTs was the person in control of, or having daily responsibility for, the daily operation of the underground storage tank system, and the "owner" of the USTs means the owner of an underground storage tank. Since the current owner of the site never also owned the underground storage tanks, ERAS is of the opinion that the County of Alameda would need to request that Chevron commence site characterization and subsequent cleanup. This recommendation is also consistent with Federal regulations in 40 CFR 280.12 *owner* (b) which may have been in effect prior to the California regulations.

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